Public Comments and Responses
Kanab Draft RMP/EIS
July 2008
Sorted by Category Name

Category Name	Commentor	Comment	Comment Summary Response
Adequacy of Analysis and Alternatives	John Veranth	Both alternative B and C are major improvements over the current situation, Alternative A. As a general comment, I consider Alternative C to be the most appropriate of the listed alteratives and am disappointed that the BLM did not consider a true "maximum resource protection" alternative that would have been more restrictive than even alternative C. NEPA requires consideration of a full spectrum of alternatives.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified including alternatives considered but dismissed from detailed analysis.
Air Quality	Laura Kamala Grand Canyon Trust	There is an omission of relevant information from the planning document in the absence of any reference to global climate destabilization. Climate models predict that current trends of higher temperatures and reduced precipitation will continue in the Upper Colorado River Basin leading to a decrease in quantity and quality of river water and severe consequences for humans, agricultural uses, wildlife and ecosystems. The KFO planning area has already been affected by the prolonged drought. Soil disturbing activities such as cattle grazing, energy exploration and development and recreation have increased dramatically and these uses destabilize soils. Massive dust storms from soil loss deposit dark-colored dust on mountain snowpacks which absorb heat and melt too soon. Snowmelt storage in watersheds is reduced. The implications of these and other climate effects on management decisions on the public lands are not adequately addressed in the RMP.	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the Proposed RMP/Final EIS and the air quality impact analysis was revised in Chapter 4.
Air Quality	National Parks Conservation Association	BLM mentions the National Park Service data show an improving visibility trend for the clearlest days; it fails to mention that the visibility trend for the haziest days is worsening (2005 Annual Performance & Progress Report: Air Quality in National Parks). There is also no mention of ammonium; a component of acid precipitation which is also worsening. Additionally, no data from other national parks including Zion and Capitol Reef bordering the planning area are mentioned. There is also no mention of ozone trends showing a decline in all area parks where trend data has been collected.	Based on public comment and BLM review, air quality data and information from Grand Canyon National Park, Bryce Canyon National Park, and Canyonlands National Park has been added to chapter 3. This additional data addresses the issues raised by the commentor.
Air Quality	National Parks	The BLM erroneously states that "A direct relationship between emissions and	A meaningful quantification of potential air quality impacts requires specific

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	Conservation Association	visibility impairment does not exist, and so the qualitative emissions analysis cannot be used to assess potential visibility impacts on nearby Class I areas from activities within the decision area." According to the National Park Service" Visibility monitoring and research by NPS and others have found fine particles less than 2.5 millionths of a meter in diameter (PM2.5) in the form of sulfates, nitrates, organics, elemental carbon, and soil particles are primarily responsible for visibility impairment." According to EPA visibility impairment or haze is caused by particulate matter emitted from sources including power plants, automobiles and other industries.	information associated with potential emission sources, such as emission rate and source location. At the land use planning level, this type of analysis is not possible due to the unknown source locations, emission rates, and potential sources. A site-specific air quality impact analysis will be conducted in site-specific NEPA on a case-by-case basis.
Air Quality	National Parks Conservation Association	BLM errs in using a "qualitative analysis" instead of using available air quality data. They have ignored their obligation to analyze the direct and indirect impacts of their management actions. BLM states "Because a quantitative relationship between the expected air emissions calculated above and the subsequent potential impacts on the air quality values of visibility, atmospheric depositon, or ozone are not known, it is not possible to draw any conclusions about the potential impacts expected to these air quality values." However, there is an ample air data including trend data available through a variety of sources including the National Park Service, IMPROVE, WRAP and EPA. The BLM needs to re-evaluate its finding of "no significant" impacts since it failed to utilize existing air quality data and make a meaningful analysis of current and future conditions.	The quantification of potential future impacts to air quality from potential future emission sources requires the application of dispersion modelling. The application of dispersion models in the absence of specific detailed information about those sources, such as emission rate and source location, may result in large uncertainty. This uncertainty in the estimation of the potential impacts could compromise the reliability of those estimations. A site-specific air quality impact analysis will be conducted in site-specific NEPA on a case-by-case basis.
Air Quality	National Parks Conservation Association	The cumulative air analysis fails to adequately address the threats from increased energy development in the area. The Four Corners region is seeing an explosion in oil and gas development along with proposed coal fired power plant. There are also four new proposed coal fired power plants across the border in Nevada. Additionally, the surrounding BLM regions of Richfield and Monticellow are releasing resource management plans that were not considered but have potential impacts on the Kanab planning area. BLM needs to adquately address these impacts.	BLM continues to have confidence in the cumulative analysis. The purpose of the air resources analysis, including the cumulative analysis, is to focus on the potential impacts of the proposed action. BLM activities will be low in comparison to existing sources and would not cause exceedance of State or federal ambient air quality standards.
Air Quality	SUWA	The DRMP fails to adequately assess the impacts of the proposed management alternatives on air quality. The DRMP fails to include any quantitative information, analysis or models to assist the decision-maker on this issue.	The quantification of potential future impacts to air quality from potential future emission sources requires the application of dispersion modelling. The application of dispersion models in the absence of specific detailed information about those sources, such as emission rate and source location, may result in large uncertainty. This uncertainty in the estimation of the potential impacts could compromise the reliability of those estimations. A site-specific air quality impact analysis will be conducted in site-specific NEPA on a case-by-case basis.
Areas of Critical Environmental Concern	James & Lorna Sills	Areas of Critical Environmental Concern (ACEC) Cottonwood Canyon ACEC is proposed in Alternate B. We can understand and accept this ACEC to protect the watershed, but 3800 acres seems extreme and we question whether this much acreage is needed. In addition, we strongly oppose the designation of any additional ACECs	Appendix H of the Draft RMP/EIS includes the process and criteria used to evaluate proposed ACECs. The process and criteria are based on FLPMA, 43 CFR 1610.7-2, and BLM Manual 1613. The boundary of the Cottonwood Canyon ACEC was expanded to include relevant and important values associated with the existing ACEC that extend beyond the current boundary.

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Areas of Critical Environmental Concern	Jim & Bonnie Vann	Another area is the proposed Cottonwood Canyon ACEC. Although this canyon deserves protection primarily as a water source for the town of Fredonia, I believe its current scope is too broad and that there is no need for any additional ACEC's.	The boundary of the Cottonwood Canyon ACEC was expanded to include relevant and important values associated with the existing ACEC that extend beyond the current boundary. Appendix H of the Draft RMP/EIS includes the process and criteria used to evaluate proposed ACECs. The process and criteria are based on FLPMA, 43 CFR 1610.7-2, and BLM Manual 1613.
Areas of Critical Environmental Concern	Land Use Volunteers of Kane County	We ask that the BLM implement all 5 of these ACEC areas in the final RMP. We also ask that the BLM reconsider the original nomination of the White Cliffs ACEC and reinstate the land that was originally specified for that ACEC. For some reason, the BLM had removed the upper Kanab Creek riparian corridor from the proposed ACEC area. This stream and riparian corridor needs to remain in the White Cliffs ACEC. There is no reason not to include it. Streams like Kanab Creek are very rare in our area and need protection.	Appendix H of the Draft RMP/EIS includes the process and criteria used to evaluate proposed ACECs. The process and criteria are based on FLPMA, 43 CFR 1610.7-2, and BLM Manual 1613. The relevant and importance values that the commentor raises were not found on all of the acres in the nominated ACEC and therefore the ACEC size was reduced and the boundary adjusted.
Areas of Critical Environmental Concern	Laura Welp	In addition, all the motorized SRMPs contradict the ACECs that were proposed in these areas.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. The BLM, in developing the PRMP/FEIS, can chose management actions from within the range of the alternatives presented in the DRMP/DEIS and create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple-use mandate.
Areas of Critical Environmental Concern	Laura Welp	This is inconsistent with the preferred alternative's proposal for a motorized RMZ in the middle of Welsh's milkweed designated critical habitat. The Special Management Area Moquith Mountain Dunes RMZ could be disastrous for this plant. In ACEC analysis, recommendation to maintain existing management is not being followed if you put a motorized RMZ on top of the main portion ofthe population (see map on page 12 of attachment). The OHV's already have the Coral Pink Sand Dunes State Park for cross-country motorized recreation, and don't need a special management area on the BLM portion ofthe dunes, especially when it might impact a listed Threatened species.	The Welsh's milkweed conservation area B, in the BLM portion of the sand dunes, remains closed to OHV in the Proposed RMP/Final EIS. This area was designated in consultation with the USFWS. The area is continuing to be monitored to ensure adequate protection of the species.
Areas of Critical Environmental Concern	Margaret Stone	ACEC's Five areas were nominated and found eligible to be Areas of Critical Environment Concern. These areas contain an approved total of 60600 ac. Since 60600 ac were found to be eligible why is the BLM recommending only 3800 ac in its preferred plan? These areas should by given priority and all should be implemented.	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best

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Areas of Critical Environmental Concern	Rebecca Mann	Regarding the preferred designation of Areas of Critical Environmental Concern (ACECs). Designating protective boundaries around currently undisturbed and high-quality wilderness areas ensures the persistence of unique, high-quality natural resources and ecological processes. All areas proposed as potential ACEC units should be designated as such. Many of these areas contain irreplaceable habitat, such as the sand dunes in which the federally threatened Welsh's Milkweed (Asclepias welshii) thrive. For this particular case, if the Coral Pink Sand Dunes area is opened for ORV use, the individuals of Welsh's Milkweed in the affected area will not have adequate reproductive opportunities, damaging the genetic diversity and overall health of this critical population. Other potential Areas of Critical Concern, including Cottonwood Canyon, Parunuweap Canyon, Moquith Mountain WSA, and the Vermillion and White Cliffs, share similar unique and special resources, and only a strict designation to protect these areas will ensure their natural values.	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD).
Areas of Critical Environmental Concern	Richard Csenge	Identified ACECs including the Vermillion Cliffs, Parunuweap, White Cliffs, Cottonwood Canyon and Welsh's Milkweed, and eligible Wild and Scenic River segments are not being given the protection they deserve in Alternatives A, B or D. If ACECs and WSRs in the Kanab District have been found to be suitable for designation, they should be included in the preferred alternative.	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection of ACECs. The BLM gave full consideration to the designation and preservation ACEC during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period. Five of the ACEC nominations were found to meet both the criteria of relevance and importance and all these were included for special management as proposed ACECs in Alternative C. In addition, Appendix G of the Draft RMP/EIS describes the rationale for selecting WSR suitable for designation.
Areas of Critical Environmental Concern	Susan Hand	Areas of Critical Environmental Concern I am confused that the KFO seems to acknowledge that the proposed ACECs are justified, and yet Alternative B disregards staff recommendations. Since an ACEC designation is based on unique resources (ecological, biological, historical, or cultural), it seems incongruous that the BLM not designate what it has clearly identified. The Coral Pink Sand Dunes of the Moquith Mountian WSA, the Vermilion and White Cliffs, and Purunaweap Canyon are worthy of ACEC designation, but have been overlooked.	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons

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Areas of Critical Environmental Concern	SUWA	To rectify this, once BLM has determined that certain areas in the Kanab Field Office contain the requisite relevant and importance values - which the Kanab Field Office has already done - the agency must prioritize the designation ofthose areas as ACECs over other competing resource uses.	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best

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Areas of Critical Environmental Concern	SUWA	BLM's treatment of proposed ACECs in the DRMP/EIS does not comply with either FLPMA's mandate or the agency's own internal guidance.	Appendix H of the Draft RMP/EIS includes the process and criteria used to evaluate proposed ACECs. The process and criteria are based on FLPMA, 43 CFR 1610.7-2, and BLM Manual 1613.
Areas of Critical Environmental Concern	SUWA	BLM has improperly ignored or discounted the threats to special places from oil and gas development and off-road vehicle use, and thus failed to designate and/or failed to incorporate sufficient protections for proposed ACECs.	Section 4.4.1 of Chapter 4 of the Draft RMP/EIS includes an analysis of the probability of irreparable damage to the relevant and important values. Appendix H of the Draft RMP/EIS includes the process and criteria used to evaluate proposed ACECs. The process and criteria are based on FLPMA, 43 CFR 1610.7-2, and BLM Manual 1613.
Areas of Critical Environmental Concern	SUWA	However, the Kanab DRMP fails to support designation of ACECs to protect these values. BLM has identified approximately 89,780 acres of lands with wilderness characteristics.	Appendix H of the Draft RMP/EIS includes the process and criteria used to evaluate proposed ACECs. The process and criteria are based on FLPMA, 43 CFR 1610.7-2, and BLM Manual 1613.
Areas of Critical Environmental Concern	SUWA	That BLM has determined that 60,600 acres meet the relevance and importance criteria for ACEC designation, BLM must give priority to the designation of these ACECs in all alternatives, not merely Alternative C.	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention.

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Areas of Critical Environmental Concern	SUWA	SUWA also contends that the values found to relevant and important extend to acreage beyond the 6,100 in the potential ACEC. We urge the BLM to re-evaluate the extent of these values and designate a larger acreage. (Parunuweap Canyon)	Appendix H of the Draft RMP/EIS includes the process and criteria used to evaluate proposed ACECs. The process and criteria are based on FLPMA, 43 CFR 1610.7-2, and BLM Manual 1613. The relevant and importance values that the commentor raises were not found on all of the acres in the nominated ACEC and therefore the ACEC size was reduced and the boundary adjusted.
Areas of Critical Environmental Concern	Tracy Hiscock	The BLM RMP fails to implement the five Areas of Critical Environmental Concern (ACEC), that were nominated for the plan under the Federal Land Policy and Management Act (FLPMA), Title II, Section 202(c)3.	Section 4.4.1 of Chapter 4 of the Draft RMP/EIS includes an analysis of the probability of irreparable damage to the relevant and important values. Appendix H of the Draft RMP/EIS includes the process and criteria used to evaluate proposed ACECs. The process and criteria are based on FLPMA, 43 CFR 1610.7-2, and BLM Manual 1613.
Areas of Critical Environmental Concern	Utah Archeological Research Institute	We suggest that all these areas be combined and placed in one ACEC, and it should include all BLM administered lands in the entire Cottonwood Canyonj drainage system from highway 89 on the east to the Coral Pink Sand Dunes on the west and the Arizona border on the south, and that it should be established for protection of archaeological resources.	The proposed Cottonwood Canyon ACEC encompasses the documented archaeological sites within the Cottonwood Canyon drainage on BLM lands, while the proposed Parunuweap Canyon ACEC would encompass many of the known cultural resource sites in that drainage. Much of the lands in the Parunuweap Canyon and Moquith Mountain areas are within WSAs and are afforded certain protections by inclusion in WSAs. Both Parunuweap Canyon and portions of Cottonwood Canyon are within eligible or suitable Wild and Scenic River corridors, and would be afforded additional protections under these designations. Additionally, cultural resource sites are protected by a variety of Federal laws and

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Areas of Critical Environmental Concern	Utah Rock Art Research Association	The area proposed under alternative C should be expanded eastward to include all public lands adjacent to Kanab and should include areas west of Three Lakes Canyon. This region has significant early Basketmaker Anasazi and Pueblo III archeological sites including a bird-headed Basketmaker Style rock art panel that is reminiscent of rock are found in the Grand Gulch region. These cultural resources need to be proactively managed through an archeologically focused ACEC including cultural resource inventories, nominations to the Nation Register, interpretation and education facilities near well known sites, physical monitoring, and being closed to surface occupancy and natural resource leasing in this area.	The proposed Cottonwood Canyon ACEC encompasses the documented archaeological sites within the Cottonwood Canyon drainage on BLM lands, while the proposed Parunuweap Canyon ACEC would encompass many of the known cultural resource sites in that drainage. Much of the lands in the Parunuweap Canyon and Moquith Mountain areas are within WSAs and are afforded certain protections by inclusion in WSAs. Both Parunuweap Canyon and portions of Cottonwood Canyon are within eligible or suitable Wild and Scenic River corridors, and would be afforded additional protections under these designations. Additionally, cultural resource sites are protected by a variety of Federal laws and statutes. Establishment of a cultural ACEC designed to incorporate these areas would not further protect these resources, but might instead call excessive attention and possible adverse impacts to them. While it is recognized that there are important Basketmaker and Anasazi sites in the immediate Kanab vicinity, this is true for most of the southern portion of the Kanab Field Office. The establishment of a cultural resource ACEC over only part of this area would unduly emphasize the importance of some sites while seemingly lessening the importance of others. The establishment of a cultural ACEC covering the entire southern half of the KFO would be unrealistic and unmanageable. Several of the most historically important sites and some exhibiting the best preservation are located on private lands and are not subject to Federal protection. Documentation of cultural resource sites is done on an as-needed basis (Section 106 NHPA) or as possible for research and informational requirements (Section 110 NHPA). The BLM is limited in its ability to perform Section 110 inventories by staff and

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			budgetary constraints. Educational and interpretive facilities are also recognized as an important part of the BLM cultural resource program and allocation of a site for public use is specifically addressed in the Draft RMP/EIS chapter 2, but again budgetary and personnel restrictions limit these activities. Cultural resource sites are monitored on an as-possible basis, with special attention to sites of particular importance or susceptibility to vandalism or other adverse impacts.
Areas of Critical Environmental Concern	Utah Rock Art Research Association	We believe the region from the Arizona state line north to the East Fork of the Virgin River and from Kane County line to Yellowjacket Canyon Road should be included in the ACEC. There are rock art sites south of the Virgin River of an unusual style not found anywhere else. This is an archeologically unique area within the state of Utah and requires special attention to documentation and protection.	The proposed Cottonwood Canyon ACEC encompasses the documented archaeological sites within the Cottonwood Canyon drainage on BLM lands, while the proposed Parunuweap Canyon ACEC would encompass many of the known cultural resource sites in that drainage. Much of the lands in the Parunuweap Canyon and Moquith Mountain areas are within WSAs and are afforded certain protections by inclusion in WSAs. Both Parunuweap Canyon and portions of Cottonwood Canyon are within eligible or suitable Wild and Scenic River corridors, and would be afforded additional protections under these designations. Additionally, cultural resource sites are protected by a variety of Federal laws and statutes. Establishment of a cultural ACEC designed to incorporate these areas would not further protect these resources, but might instead call excessive attention and possible adverse impacts to them. While it is recognized that there are important Basketmaker and Anasazi sites in the immediate Kanab vicinity, this is true for most of the southern portion of the Kanab Field Office. The establishment of a cultural resource ACEC over only part of this area would unduly emphasize the importance of some sites while seemingly lessening the importance of others. The establishment of a cultural ACEC covering the entire southern half of the KFO would be unrealistic and unmanageable. Several of the most historically important sites and some exhibiting the best preservation are located on private lands and are not subject to Federal protection. Documentation of cultural resource sites is done on an as-needed basis (Section 106 NHPA) or as possible for research and informational requirements (Section 110 NHPA). The BLM is limited in its ability to perform Section 110 inventories by staff and budgetary constraints. Educational and interpretive facilities are also recognized as an important part of the BLM cultural resource program and allocation of a site for public use is specifically addressed in the Draft RMP/EIS chapter 2, but again budgetary and personnel restrictions limit these activities. Cultural resource sites are monitored on an as-possible basis, with special attention to sites of particular importance or susceptibility to vandalism or other adverse impacts.
Areas of Critical Environmental Concern	Walter Fertig	ACEC designation: The Field Office resource staff did a good job of evaluating the merits of the proposed ACECs in the planning area, but oddly, their recommendations are being bypassed in the preferred alternative B. ACECs are valuable chiefly for drawing attention to areas of unusual biological, ecological, cultural, or historical interest. Ideally, BLM would develop management prescriptions to ensure these values are maintained, but at a bare minimum the ACEC designation identifies that such a value exists so that future actions and	Appendix H of the Draft RMP/EIS includes the process and criteria used to evaluate proposed ACECs. The process and criteria are based on FLPMA, 43 CFR 1610.7-2, and BLM Manual 1613.

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		proposals can be dealt with in ways to minimize impacts. Ignoring the assessment that all ofthe proposed areas meet ACEC requirements and the specious reasoning that the areas are already protected by other management tools makes Alternative B's dismissal ofall but the existing Cottonwood Canyon ACEC seem arbitrary and counter to the BLM's resource management mandate. Besides, if the areas are already adequately protected without the ACEC designation, no harm is done by making them ACECs!	
Consultation and Coordination	Bryce Canyon National Park	Stipulations for Mineral Leasing: As the resources management planning process moves forward, we would like to work with you to develop appropriate stipulations for mineral extraction activities near the park. The fundamental purpose of such stipulations will be to protect those values that we have identified in this letter.	The BLM has coordinated closely with the parks in identifying their concerns and providing opportunities for direct coordination during key points of the planning process. These coordination actions are detailed in the Draft RMP/EIS chapter 5, page 5-5.
Consultation and Coordination	Five County Association of Governments	The Draft RMP goes on to simply state that the preferred alternative is consistent with local plans to the extent possible. No analysis of how this conclusion was reached is made. This is a serious omission. The consistency section should be expanded to include such an analysis.	A consistency review of the Proposed RMP with the State and County Master Plans is included in Chapter 5 of the Proposed RMP/Final EIS.
Consultation and Coordination	Monte Chamberlin	Proposed RMP plans are not in accordance with the Kane County General Plan or state law and federal law. The elected officials of the County were "bypassed" and/or given misinformation during the planning stage ofthe process. BLM does not have the authority to override or "bully" county officials or usurp the authority of duly elected individuals to govern.	The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled. Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.
Consultation and Coordination	SUWA	Recommendation: The Kanab RMP should reflect certain aspects of the GSENM RMP for consistency purposes as well as to provide both the Kanab planning area and the GSENM the proper protection needed to ensure long-term preservation of the outstanding values of this landscape. The RMP should also provide measurable goals, objectives, and desired future conditions that recognize the area's special virtues of ruggedness, remoteness, and wildness.	The Kanab Field Office has coordinated with the GSENM in developing the Draft RMP/EIS and the Proposed RMP/Final EIS. Several members of the GSENM staff are included on the BLM interdisciplinary team.
Consultation and Coordination	SUWA	Recommendation: The Kanab RMP should be consistent with the management of the National Parks in the area and should provide management objectives and	The BLM has coordinated closely with the parks in identifying their concerns and providing opportunities for direct coordination during key points of the planning

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		prescriptions that protect and do not impair the conservation values of the adjacent and nearby National Parks. This should include, but is not limited to, the air quality and visibility impairment of the Parks from actions occurring within the planning area.	process. These coordination actions are detailed in the Draft RMP/EIS chapter 5, page 5-5.
Consultation and Coordination	Utah Archeological Research Institute	No roads should be closed without consultation with all Native American Tribes. The BLM's policy should be in complete compliance with the American Indian Religious Freedom Act; Executive Order 13007: Indian Sacred Sites; Executive Order 13175: Consultation and Coordination with Indian Tribal Governments and all other federal laws, regulations and executive orders that recognize the "unique relationship" between the federal government and Indian tribes, (see also Advisory Council on Historic Preservation Policy Statement, dated November 17, 200, regarding relationships with Indian tribes).	BLM is committed to consult with Native American Tribes as required by 36 CFR 800.2 and described in BLM Manual 1820 and Handbook 1820. Appropriate implementation level actions will follow the BLM's established protocol for consultation.
Consultation and Coordination	Zion National Park	Because of this we strongly suggest that as part of the Preferred Alternative for the Final Resource Management Plan (FRMP), BLM lands adjacent to the park (within 2-miles of the park boundary - refer to attached Map) be designated as Visual Resource Management (VRM) Class I.	An arbitrary 2-mile buffer around Zion National Park would be contrary to BLM's multiple-use mandate as defined by FLPMA. The Draft RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near the park include restrictions on surface disturbing activities and resource uses address the issues raised.
Consultation and Coordination	Zion National Park	In additional we ask that these same lands be designated exclusion areas for all right-of-way and communication sites (e.g., cell phone towers) to protect these scenic vistas.	An arbitrary 2-mile buffer around Zion National Park would be contrary to BLM's multiple-use mandate as defined by FLPMA. The Draft RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near the park include restrictions on surface disturbing activities and resource uses address the issues raised.
Consultation and Coordination	Zion National Park	Second, to protect the scenic integrity along the Highway 9 corridor from Mt. Carmel Junction to the east entrance of the park and from integral vistas within the park, it is important that the BLM designate the corridor and vistas within the view-shed from the park as VRM Class II.	An arbitrary 2-mile buffer around Zion National Park would be contrary to BLM's multiple-use mandate as defined by FLPMA. The Draft RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and

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			of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near the park include restrictions on surface disturbing activities and resource uses address the issues raised.
Consultation and Coordination	Zion National Park	In addition to Class II VRM designation, we ask as part of the Preferred Alternative for the FRMP that this corridor be designated as avoidance areas for all right-of-way and communication sites (e.g., cell phone towers) to protect the scenic vistas.	An arbitrary 2-mile buffer around Zion National Park would be contrary to BLM's multiple-use mandate as defined by FLPMA. The Draft RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near the park include restrictions on surface disturbing activities and resource uses address the issues raised.
Consultation and Coordination	Zion National Park	As part of the Preferred Alternative for the FRMP, we strongly request that BLM lands within 2-miles of the park be closed to OHV use. This includes closing any roads that dead-end at the park boundary (refer to attached Map).	An arbitrary 2-mile buffer around Zion National Park would be contrary to BLM's multiple-use mandate as defined by FLPMA. The Draft RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near the park include restrictions on surface disturbing activities and resource uses address the issues raised.
Consultation and Coordination	Zion National Park	As part of the Preferred Alternative for the FRMP, we strongly request that areas immediately adjacent to and near the park (within 2-miles of the park boundary - refer to attached Map) be designated: • closed to oil and gas leasing - designation should apply to both Federal surface/Federal minerals and . private surface/Federal minerals (split-estate); • closed to coal leasing; • withdrawn from locatable mineral entry; • closed to mineral material disposal; and • closed to non-energy mineral leasing .	An arbitrary 2-mile buffer around Zion National Park would be contrary to BLM's multiple-use mandate as defined by FLPMA. The Draft RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in

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			coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near the park include restrictions on surface disturbing activities and resource uses address the issues raised.
Consultation and Coordination	Zion National Park	In order to minimally protect the watersheds to help mitigate the influx of non-native plant species into the park, we again ask as part of the Preferred Alternative for the FRMP that all lands, within 2-miles (at a minimum) of the park boundary be (refer to attached Map): • closed to all surface disturbing activities; and • that any restoration use only plant species native to the area.	An arbitrary 2-mile buffer around Zion National Park would be contrary to BLM's multiple-use mandate as defined by FLPMA. The Draft RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near the park include restrictions on surface disturbing activities and resource uses address the issues raised.
Cultural Resources	Christopher Lish	Unlimited damage would also occur to the historical record of native cultures, because the BLM has not conducted any surveys to determine the location and extent of archaeological artifacts or culturally important sites, or the impact of ORVs on these irreplaceable resources, despite authorizing ongoing ORV use that could destroy them forever.	The BLM will comply with its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with Section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the Area of Potential Effect and compliance with Section 106 prior to designation. Class III inventory of the APE and compliance with Section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for

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			specific projects, may be appropriate for larger planning areas for which limited information is currently available. The SHPO concurrence letter with Section 106 consultation is contained in the Proposed RMP/Final EIS appendices.
Cultural Resources	Colorado Plateau Archaeological Alliance	CPAA recognizes that cultural resources can be adversely impacted through the course of non-regulated surface-disturbing activities such as cross-country OHV travel, wildfires, collection of artifacts, vandalism and pedestrian impacts that are not typically considered through Section 106 reviews. However, such adverse impacts to cultural resources are, in many instances, the indirect consequence of regulated surface-disturbing activities that are considered during the Section 106 review process (e.g., road access to accommodate development that subsequently provides access to looters and vandals). Consequently, the Draft EIS must adequately consider all impacts of undertaking on National Register-eligible properties that may be a consequence of the undertaking but not directly related to it. The document currently does not address this issue.	As noted in the Draft RMP/EIS page 4-3, one of the over-arching assumptions for the impact analysis is that "public land users would comply with the decisions and allocations contained in the alternatives." The Draft RMP/EIS proposes a variety of actions and analyzes the impacts of those actions. There are countless ways that individuals can inadvertently or wantonly not comply with the Draft RMP/EIS prescriptions, none of which are actions proposed in any of the chapter 2 prescriptions. Impacts from illegal behavior are therefore an issue of enforcing the prescriptions contained in the various alternatives. Allocation of law enforcement presence is an Administrative Action by the BLM and does not require a specific planning decision to implement.
Cultural Resources	Colorado Plateau Archaeological Alliance	The Draft EIS also fails to properly consider cumulative impacts (DEIS 4-280 to 4-281). A mere acknowledgement that resource decisions resulting from the RMP "could produce cumulative impacts on cultural resources and resources of religious or traditional importance to Native American tribes" does not constitute a careful consideration of what those cumulative impacts would be under each of the alternatives. In fact, there is no acknowledgement that components of all alternatives increase the risk to cultural resources from looting, vandalism and other inadvertent impacts. Other Draft EISs prepared for Moab and Monticello at least recognize "the potential impacts from the continually increasing recreational visitation" and that "the substantial increase in OHV ownership and recreational use will continue to subject cultural resources in the region to heightened risk of damage, vandalism and/or looting" (see Moab DEIS 4-502). CPAA concurs with the assessment in the Moab DEIS, and recommends that the Kanab Draft EIS be modified to acknowledge and fully analyze the potential impacts of OHV use on such a massive scale that could result in cumulative effects to site setting and integrity, even if the historic properties themselves are not directly impacted (see 36 CFR 800.5(a)(2)(v)).	As noted in the Draft RMP/EIS page 4-3, one of the over-arching assumptions for the impact analysis is that "public land users would comply with the decisions and allocations contained in the alternatives." The Draft RMP/EIS proposes a variety of actions and analyzes the impacts of those actions. There are countless ways that individuals can inadvertently or wantonly not comply with the Draft RMP/EIS prescriptions, none of which are actions proposed in any of the chapter 2 prescriptions. Impacts from illegal behavior are therefore an issue of enforcing the prescriptions contained in the various alternatives. Allocation of law enforcement presence is an Administrative Action by the BLM and does not require a specific planning decision to implement.
Cultural Resources	Colorado Plateau Archaeological Alliance	As such, the Travel Plan is fundamentally flawed on two important points: (1) The failure of the BLM to conduct adequate analysis in the past related to OHV impacts along routes currently being used by motorized vehicles was and still remains an abrogation of agency's Section 106 responsibilities, and the failure of the agency to recognize or correct this deficiency in the new Travel Plan appears to validate and perpetuate the agency's failure to comply with Section 106 requirements in the past; and (2) the failure to require Class III inventories along routes prior to designation suggests the agency official has already made a determination, as per 36 CFR 800.3(a), that travel route designations in such	The BLM will adhere to its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued

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		instances are not an undertaking as defined in 36 CFR 800.16(y).	use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available.
Cultural Resources	Colorado Plateau Archaeological Alliance	A factual inaccuracy needs to be corrected in Section 3.2.9 Current Conditions (DEIS 3-58) that states Noel Morss led the pioneering archaeological investigations of the Claflin Emerson Expedition. Morss, a major figure in Utah archaeology, was actually a minor figure on the Claflin Emerson Expedition, which was led in 1929 and 1930 by Henry B. Roberts, and in 1931 by Donald Scott. Morss was a member of the expedition but only peripherally, conducting his own investigations in Wayne County in 1928 and 1929 (mostly in areas managed by the Richfield Field Office, Price Field Office and Capitol Reef National Park that are irrelevant to this Draft EIS).	The Proposed RMP/Final EIS has been revised to include the commentor's textual recommendations
Cultural Resources	Colorado Plateau Archaeological Alliance	As described in Areas of Importance to Native American Tribes (DEIS2-56), the BLM would "allow Native American non-commercial traditional use of vegetation and forest and woodland products for the collection of herbs, medicines, traditional use items, or items necessary for traditional, religious or ceremonial purposes, through permits" (emphasis added). The establishment of a permitting process to allow Native American use of items necessary for traditional, religious or ceremonial purposes would appear to contradict the spirit of the American Indian Religious Freedom Act (42 U.S.C. 1996) guaranteeing the freedom of Native Americans to worship through ceremonials and traditional rites.	The BLM has a very good relationship with the local Tribes, and their use of public resources. However, to ensure proper management of its resources, the BLM uses the permitting process to know where various activities are taking place and to what extent resource uses are occurring. These permits are issued free of charge to Native American Tribes, and are designed to track usage of resources. These are not intended to hinder noncommercial, traditional use.
Cultural Resources	Diane Orr BeecherFilms	The BLM has overall failed to provide an alternative which fulfills the BLM's duty to protect cultural resources in the Kanab Management Area as outlined by the National Historic Preservation Act.. I am profoundly concerned that cultural resources, particularly rock art, will be damaged or completely destroyed if the BLM proceeds to allow the extensive energy development suggested in all alternatives. I have consulted with J. Claire Dean of Dean and Associates Conservation Services. Ms. Dean has over 27 years of experience in rock art and archeological conservation. Ms. Dean states that industrial traffic can damage	It appears the commentor believes the level of oil and gas development in the Kanab planning area is comprable to other BLM offices in Utah. The reasonably foreseeable oil and gas development scenario for the Kanab planning area is only 90 wells over the next 20 years. The location of these estimated wells is unknown, and therefore the impacts from "industrial dust" are unknown, as the mineral development could occur in areas with broad open landscapes far removed from rock art sites. The impacts described by the commentor from dust have not been identified as an issue in the Kanab area, as they have been in the Price area in

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		rock art in several ways. Dust accumulates on the rock surface. The natural hydrology of the rock lays down a mineral layer on the rock surface which may mix with the dust and essentially coat the rock art, reducing the visibility of the petroglyphs. The extent and amount of damage depends on the geologic and hydrologic characteristics of the rock surface. Without studying these characteristics, the BLM can not know whether or not energy development will damage or destroy world class cultural resources. Your plans do not discuss or even mention these important factors in your energy development plans. Further, without such research, no development should occur where rock art would be exposed to industrial dust. Another consideration, entirely neglected by the BLM draft management plan, is the impact of wind-blown dust on the surface of rock art. In NineMileCanyon, industrial traffic has caused 30 foot plumes of dust which have covered panels on high cliff surfaces. Ms. Dean states that wind-blown dust and sand act like an abrasive on rock surfaces. The rock art literally can be sanded off the surface with cumulative and continual sand blasting. I saw no mention of this danger in you consideration of energy development in cultural resource areas. I have discussed dust resulting from industrial traffic, but ORVs and ATVs may also cause sufficient dust to do damage to rock art. URARA recommends that no roads or trails be further designated within one quarter mile of rock art. We feel this is a conservative request without the benefit of necessary research. Without further research, BLM is putting rock art at risk in all of the alternatives provided for public comment.	regards to development in Nine Mile Canyon. Therefore, it is not necessary to note these potential impacts in the Draft RMP/EIS. Additionally, all development projects are covered through inventories required under section 106 of the NHPA, and sites identified through these inventories will receive protective measures as needed during project implementation. Where there may be questions regarding what impacts a site may suffer, it is the policy of the Kanab Field Office to err on the side of caution. All relevant information will be researched regarding protective and mitigative measures prior to implementation.
Cultural Resources	Tim Peterson	Please establish and implement a schedule to completely survey your field office for cultural resources. In areas of known conflict, protection of cultural resources should take precedence over other activities including off-roading.	Setting a schedule for completing a 100% survey of the Kanab decision area would require an long-term allocation of funding and staffing. Funding and staffing decisions are outside the scope of this NEPA document. The Draft RMP/EIS Cultural Resource Decisions (page 2-56) outline which areas would receive priority for proactive Section 110 inventories, which includes areas of known conflict. Concerning cultural inventories associated with OHV use, the BLM will comply with its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with Section 106, focused

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			on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the Area of Potential Effect and compliance with Section 106 prior to designation. Class III inventory of the APE and compliance with Section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available. The SHPO concurrence letter with Section 106 consultation is contained in the Proposed RMP/Final EIS appendices.
Cultural Resources	Utah Archeological Research Institute	The above statements are not meant to imply or indicate that we advocate roads leading directly to archaeological sites. We have found that where roads lead directly to archaeological sites, vandalism and loss of artifacts always occurs. We recommend that all roads end at least 1/4 mile from rock art sites and that the best measure of protection is having no roads leading to archaeological sites.	While having no roads leading to cultural resource sites, including rock art sites, would likely benefit a large number of such sites, the reality of the matter is that the presence of cultural resource sites and roads often coincide. Where possible and practical, roads are directed away from cultural resource sites or terminated before the site is encountered. Where this is not possible, the BLM attempts to monitor the site as frequently as possible and offer other protections where possible. Cultural resource site locations were considered during the route identification process, identified in the Draft RMP/EIS Appendix K. As route identification is an implementation-level decision, future changes in the route network could be considered based on changes to resource condition or levels/types of use, as described in Draft RMP/EIS Appendix K.
Cultural Resources	Utah Archeological Research Institute	On pages ES-11 you state "Impacts from increasing levels of cross-country OHV use would affect long-term condition of soils, water quality, and vegetation communities" you need to add something to the effect that this action also adversely impacts archaeological resources. On page 1-9, under recreation, you state: "In certain parts, increased visitor use is affecting soil, water, vegetation, and wildlife" You need or add: and is adversely impacting prehistoris archaeological resources.	The Proposed RMP/Final EIS has been revised.
Cultural Resources	Utah Archeological Research Institute	On Page 2-25 the DRMP/DEIS would "regulate rock climbing within 300 feet of cultural sites. Climbing routes that impact cultural resource sites would generally not be allowed, and climbing routes designed to access cultural resource sites would not be allowed unless under permit for scientific investigation." We request that that this distance be increased to 500 feet from rock art sites. We ask for this change because it has been determined that the rock art was placed in specific locations to interact with shadows created by the sun and nearby rock formations as it travels throughout the year. In one instance, a large rock appears to have been placed on a ledge to cast a shadow on a specific element or elements in a prehistoric panel at a specific time, or perhaps times of year, thus creating a clendrical function to the site. Rock climbers can intentionally or unintentionally	The 100 yards (300 feet) avoidance prescription for rock art sites is appropriate for protection in regards to rock climbing. There are no known calendric rock art sites in the Kanab decision area vicinity, but where such sites are known in the American southwest, the functional components of these sites are generally in close proximity to the rock art elements (pictographs and petroglyphs). The commentor presents no evidence that an area-wide increase in the rock-climbing restriction is needed to protect cultural sites. Given the lack of additional evidence, the BLM stands by the existing language and the level of protection it will provide for cultural sites.

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		move, or even remove such a rock, which might be seen to them as an obstacle. We ask that every effort be made to keep the surroundings of rock art sites as intact as possible so research in this respect can continue without adverse impacts occurring, which would make such research impossible.	
Cultural Resources	Utah Archeological Research Institute	On page 2-56 it is stated under Prioritize New Field Inventories that the areas to be surveyed are 100 feet (30 meters) (depending on topography) on either side from the centerline of designated OHV routes and 100 feet (30 meters) (depending on topography) on either side from the centerline of a road. This is not acceptable and needs be modified. This assumes direct impacts, however most of the damage comes from indirect impacts where a feature that might contain an archaeological site is visible from the road or tail, like a rockshelter, a cave, a cliff face where there may be rock art, or a concentration of stones. You need to include in the survey any area or feature that is visible from the road or trail that might contain archaeological sites, because I can guarantee you that if any of these features are present, people will stop and walk over to them, even if they are more than a mile away. We know, because we do it all the time.	Priority areas for proactive cultural inventories are designed to address areas with a high potential for impacts. Where practical, cultural features as rock shelters, potential structural sites, or likely rock art locations visible from roads and trails are and would be inventoried in conjunction with the road inventory. However, expanding all such inventories to a mile or more surrounding the road or trail in question is not always possible or a reasonable use of time, funding and resources. Expanding the inventory areas could occur on a case-by-case basis.
Cultural Resources	Utah Archeological Research Institute	Is the difference between a Class I, II and III cultural resource inventory explained in the DRMP/DEIS: If so, there should also be a reference here (page 2-56) explaining these designations.	The Draft RMP/EIS Glossary, page G-5 defines the cultural resource inventory classes.
Cultural Resources	Utah Archeological Research Institute	We also would like to note an error on page 3-58, which states, "Archaeological investigations started with the Harvard-sponsored Claflin-Emerson expeditions in the late 1920s led by Noel DARI comments Page 6 Morss". This is not correct. The Claflin Emerson Expedition was led in 1929 & 1930 by Henry Roberts and in 1931 by Donald Scott (Gunnerson 1969) and they were sponsored by Claflin and Emerson - two businessmen. Morss was a minor participant in the Claflin-Emerson Expeditions.	The Proposed RMP/Final EIS has been revised to include the commentor's textual recommendations
Cultural Resources	Utah Archeological Research Institute	We would like to suggest that you add to this statement something to the effect that: when a new hypothesis needs to be tested, as in the case of determining the meaning and purpose of rock art, if the rock art has been removed or the surroundings damaged, scientific studies will likely no longer be possible. (Rock art sites must be preserved in place.)	There are no known cases in the RMP decision area where rock art has been removed for study elsewhere. Rock art removal is in almost all cases a result of theft or vandalism, or as a last option when such a site would be destroyed by unavoidable impacts (such as blasting or inundation). Any such cases in the future would be determined on a case-by-case basis depending on the cultural site use allocation and other resource goals and objectives.
Cultural Resources	Utah Archeological Research Institute	No discussion is present regarding the distinction between OHV and licensed passenger vehicles. Here again you combine OHVs and commercially produced licensed passenger vehicles (e.g., Ford, Toyota, Jeep, etc.) in one category. It appears that you have the belief that you cannot close an area to OHV cross-country travel without also closing the existing roads in these areas to all motor vehicles. You need to realize that the two are separate issues and make this distinction clear in all discussions throughout the DRMP/DEIS. In addition, why can't you close an area to all OHVs and limit travel only to commercially manufactured licensed passenger vehicles? The absence of defining and	OHV area designations are RMP decisions that identify lands as open to cross country OHV use, limited OHV use in some manner, or closed to OHV use. OHV route identifications are an implementation level decision that allows for identification of specific routes in the limited OHV category. The BLM does not differentiate between OHV use of routes and licensed passenger vehicle use of routes (43 CFR 8340.0-5). These vehicle classes are not separated in the Draft RMP/EIS. There is no requirement to separate these vehicle classes. The Draft RMP/EIS Alternatives B, C and D either limit OHV use to identified

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		separating motorized vehicles into at least two classes is the most frustrating and annoying feature of the DRMP/DEIS. In addition, there are other related questions: Why can't you close an area to all cross-county motorized travel and leave all the roads open? We do not see this option in any of the alternatives. Why not? Aren't there enough alternatives? Perhaps you should have more than just four. Because of these issues, we do not believe that the Draft Resource Management Plan and Environmental Impact Statement develops a satisfactory procedure that adequately protects rock art and other archaeological sites in KFO managed lands.	routes or close areas to OHV use on over 99% of the decision area. In these areas, all motorized use (OHV or licensed passenger vehicles) would be limited to identified routes, with mileage that varies by alternative. The impacts to cultural resources from travel management decisions are described in the Draft RMP/EIS chapter 4, pages 4-96 through 4-115. While this notes that some impacts on cultural resources could occur, these could be mitigated.
Fire and Fuels Management	ECOS Consulting	This section is not an analysis of impacts, as it is supposed to be, it is just a series of statements stating the obvious. What is the extent of the direct, indirect, and cumulative impacts on these species if fire suppression and management plans are enacted?	Wildland fire resource protection measures (Appendix L of the Draft RMP/EIS) would be applied based on consultation with resource advisors, Emergency Stabilization and Rehabilitation plans specific for each fire, and based on site-specific conditions including fire intensity, duration, time of year, and weather. Page 2-20 of the Draft RMP/EIS further describes the resource protection measures.
Fire and Fuels Management	U.S. Geological Survey	Vegetation treatment actions have been well thought out in this draft RMP/EIS. Specifically, Table 2-1 (pp 2-16 to 2-19) nicely summarizes actions by major vegetation group. It is suggested that the final document add language that restricts seeding operations to microsites with the greatest probabilities of success. Significant time and resources have been invested in failed seeding projects on arid lands; some of these failures might have been prevented by better tailoring of treatment prescriptions by site quality. The public would also benefit if the final RMP/EIS discussed whether BLM plans to aggressively suppress wildfire, when possible, on sagebrush sites to minimize mortality to sage plants that had previously been subjected to frequent fire. This is important because most sage species cannot tolerate frequent, repeated fire.	Detailed fire decisions are included in the Southern Utah Support Area Fire Management Plan Environmental Assessment published in 2006. Additionally, seeding operations are a implementation level action that would be addressed by site-specific NEPA analysis. The fire management alternatives in the Draft RMP/EIS are designed to allow management flexibility to address the variability in conditions over the life of the RMP.
Fire and Fuels Management	U.S. Geological Survey	The Fire Regime Condition Classes (FRCC's) may not be as well defined for sage biome and other arid lands as they are for coniferous forests. It would benefit the public if the final RMP/EIS identified target vegetation descriptions in addition to FRCC's metrics of when to implement various treatments. (p. 2-16)	The Draft RMP/EIS chapter 3 section 3.2.5, under the “Upland Vegetation” heading contains descriptions for optimal and existing vegetation communities in the Kanab Field Office. Chapter 3 section 3.2.8, under the “Types of Vegetation Susceptible to Fire” heading contains descriptions of how the various vegetation communities respond to wildland fire. While the existing vegetation treatment decision in chapter 2 are based on these descriptions, basing vegetation treatment decisions on target vegetation descriptions alone does not provide the flexibility needed to apply treatments based on the ecological, social, and budgetary factors.
Lands and Realty	Bryant Shakespear Garkane Energy	While recognizing existing "major" energy corridors the draft RMP fails to meet the planning objective of providing new utility corridors that could be utilized for needed electrical transmission projects. See pages 1-10, 2-26, 3-87, 3-88. To the extent possible the RMP should identify corridors connecting the communities	The objectives on page 2-26 of the Draft RMP/EIS states "Consider energy and utility corridors to focus placement of new major ROWs for energy and transportation systems." Alternatives B and C on page 2-88 of the Draft RMP/EIS state "Preference would be to locate ROW developments in common (within

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		within the planning area. Creating such corridors would promote joint use, limit more applications and facilities to previously disturbed areas and allow utility companies to better plan upgrades and new facilities for placement in identified corridors.	existing ROWs/disturbance areas)."
Lands and Realty	Bryant Shakespear Garkane Energy	The plan fails to coordinate the placement of utility corridors with existing corridors identified by the current Dixie National Forest Management Plan. Specifically the existing corridor south of Wilson Peak, Township 36 S Range 4.5 W. See pages 1-10, 1-15, 1-18, 2-26.	The objectives on page 2-26 of the Draft RMP/EIS states "Consider energy and utility corridors to focus placement of new major ROWs for energy and transportation systems." Alternatives B and C on page 2-88 of the Draft RMP/EIS state "Preference would be to locate ROW developments in common (within existing ROWs/disturbance areas)."
Lands and Realty	Bryant Shakespear Garkane Energy	Alternatives B, C, D identify avoidance and exclusion areas. Most of these parallel US Highway-89, the Sevier River, or SR-9. As indicted on page 1-10 these areas are identified "for the goals and objectives of other resources" which certainly is important. However, the proposed avoidance and/or exclusion areas around the communities of Hatch, and Panguitch/Spry effectively cut these and other down line communities off from the existing electrical transmission backbone. Without an access route/corridor to these existing electrical transmission facilities Garkane will be unable to serve the current and future power needs of Hatch, Spry, Long Valley, Cedar Mountain, and Alton. See pages 4-193 to 4-197 and maps 2-20 to 2-22.	Avoidance areas are intended to deter any new developments, but don't necessarily exclude a new development as long as there is no other alternative location that is feasible. Exclusion areas include WSAs and Wilderness Areas. In accordance with the IMP, new rights-of-way may be approved for temporary uses that satisfy the nonimpairment criteria. New rights-of-way may be approved for temporary or permanent uses that do not satisfy the nonimpairment criteria only under any of the conditions specified in the IMP.
Lands and Realty	Bryant Shakespear Garkane Energy	Specifically Garkane has applied to construct a 138 kV transmission line from Tropic to Hatch, and a 69 kV upgradeable to 138 kV transmission line from Hatch to Long Valley Junction. Our porposed routes and several possible alternatives will cross the lands identified for avoidance or exclusion. If Garkane is unable to obtain ROW for these and future projects local citizens will likely experience more outages and will be become increasingly dependant on mobile diesel generation to meet peak power demands. Garkane would also be forced to take measures to reduce peak and base loads in these areas be establishing new service hook-up moratoriums, load shedding (rolling black outs), and increased electrical rates. The lack of sufficient power would substantially constrain local economic development contrary to the statement on page 4-260 of the draft RMP.	Avoidance areas are intended to deter any new developments, but don't necessarily exclude a new development as long as there is no other alternative location that is feasible. Exclusion areas include WSAs and Wilderness Areas. In accordance with the IMP, new rights-of-way may be approved for temporary uses that satisfy the nonimpairment criteria. New rights-of-way may be approved for temporary or permanent uses that do not satisfy the nonimpairment criteria only under any of the conditions specified in the IMP.
Lands and Realty	Bryant Shakespear Garkane Energy	Alternative B requires that consideration be given to burying new and reconstructed utility lines up to 34.5 kV. Alternative C requires burying new and reconstructed utility lines up to 34.5 kV. These requirements create unsafe working conditions and the potential for electrical flash over. See page 2-89.	The Final RMP/EIS will be updated to reflect a burial requirement of up to 24 kV.
Lands and Realty	Bryant Shakespear Garkane Energy	It is our opinion that these requirements should be modified to include voltages up to 24 kV for burial rather than the proposed 34.5 kV in order to provide safe working conditions. Please review the enclosed article.	The Final RMP/EIS will be updated to reflect a burial requirement of up to 24 kV.
Lands and Realty	Bryant Shakespear Garkane Energy	The cost increase of burying lines is significant. Based on current material prices and trenching rates Garkane estimates it will costs a project proponent 300 percent more to construct an underground distribution line opposed to an overhead line. The maintenance costs are also increased and reliability of lines	A range of alternatives must be considered in the RMP/EIS. All resource values will be considered in determining whether to require burying ROWs.

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		decreased with underground distribution line construction. The burial requirement of Alternative C is arbitrary and does not consider the effected resources, location, and environment of a proposed line. Underground distribution linjes should only be considered when overhead lines cannot meet other resource objects. See pages 2-89.	
Lands and Realty	Carl Albrecht Garkane Energy	1. While recognizing existing "major" energy corridors, the Draft RMP fails to meet the planning objective of providing new utility corridors that could be utilized for needed electrical transmission projects. See Pages 1-10, 2-26, 3-87, 3-88. To the extent possible, the RMP should identify corridors connecting the communities within the planning area. Creating such corridors would promote joint use, limit more applications and facilities to previously disturbed areas, and allow utility companies to better plan upgrades and new facilities for placement in identified corridors.	The objectives on page 2-26 of the Draft RMP/EIS states "Consider energy and utility corridors to focus placement of new major ROWs for energy and transportation systems." Alternatives B and C on page 2-88 of the Draft RMP/EIS state "Preference would be to locate ROW developments in common (within existing ROWs/disturbance areas)."
Lands and Realty	Carl Albrecht Garkane Energy	2. The plan fails to coordinate the placement of utility corridors with existing corridors identified by the current Dixie National Forest Management Plan. Specifically the existing corridor south of Wilson Peak, Township 36 S Range, 4.5 W. See Pages 1-10, 1-15, 1-18, 2-26.	The objectives on page 2-26 of the Draft RMP/EIS states "Consider energy and utility corridors to focus placement of new major ROWs for energy and transportation systems." Alternatives B and C on page 2-88 of the Draft RMP/EIS state "Preference would be to locate ROW developments in common (within existing ROWs/disturbance areas)."
Lands and Realty	Carl Albrecht Garkane Energy	4. Alternatives B, C, and D identify avoidance and exclusion areas. Most of these parallel Highway 89, the Sevier River; or SR-9. As indicated on Page 1-10, these areas are identified "for the goals and objectives of other resources" which certainly is important, However, the proposed avoidance and/or exclusion areas around the communities of Hatch, and the Panguitch/Spry Area effectively cut these and other down line communities off from the existing electrical transmission backbone. Without an access route/corridor to these exisiting electrical transmission facilities, Garkane will be unable to serve the current and future power needs of Hatch, Spry, Long Valley, Cedar Mountain, and Alton. See Page 4-193 to 4-197 and Maps 2-20 to 2-22.	Avoidance areas are intended to deter any new developments, but don't necessarily exclude a new development as long as there is no other alternative location that is feasible. Exclusion areas include WSAs and Wilderness Areas. In accordance with the IMP, new rights-of-way may be approved for temporary uses that satisfy the nonimpairment criteria. New rights-of-way may be approved for temporary or permanent uses that do not satisfy the nonimpairment criteria only under any of the conditions specified in the IMP.
Lands and Realty	Carl Albrecht Garkane Energy	Garkane has two pending applications for new transmission lines that will cross these areas. Addditional distribution lines will be needed in the Hatch and Panguitch areas as these locations continue to develop and grow. The Avoidance and/or Exclusion Zone boundaries need to be moved so that the east boundaries are west of the existing power lines.	Avoidance areas are intended to deter any new developments, but don't necessarily exclude a new development as long as there is no other alternative location that is feasible. Exclusion areas include WSAs and Wilderness Areas. In accordance with the IMP, new rights-of-way may be approved for temporary uses that satisfy the nonimpairment criteria. New rights-of-way may be approved for temporary or permanent uses that do not satisfy the nonimpairment criteria only under any of the conditions specified in the IMP.
Lands and Realty	Carl Albrecht Garkane Energy	Our proposed routes and several possible alternatives will cross the lands idenified for avoidance or exclusion. If Gakane is unable to obtain a ROW for these and future projects, local citizens will likely experience unacceptable power service and will become increasingly dependent on diesel generation to meet peak power demdns. Garkane would also be forced to take measures to reduce peak and base loads in these areas by establishing new service hoop-up	Avoidance areas are intended to deter any new developments, but don't necessarily exclude a new development as long as there is no other alternative location that is feasible. Exclusion areas include WSAs and Wilderness Areas. In accordance with the IMP, new rights-of-way may be approved for temporary uses that satisfy the nonimpairment criteria. New rights-of-way may be approved for temporary or permanent uses that do not satisfy the nonimpairment criteria only

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		moratoriums, load shedding (rolling black outs), and increased electrical rates. The lack of sufficient power would substantially constrain local economic development, contrary to the statement on Page 4-260 of the Draft RMP.	under any of the conditions specified in the IMP.
Lands and Realty	Carl Albrecht Garkane Energy	Alternative C requires burying new and reconstructed utilities lines up to 34.5 kV. These requirements create unsafe working conditions and the potential for electrical flash over. See Page 2-89.	The Final RMP/EIS will be updated to reflect a burial requirement of up to 24 kV.
Lands and Realty	Carl Albrecht Garkane Energy	Alternative B, C, and D require the use of non-reflective wire (non-specular conductor). Projects using non-specular conductor have had a marked increase of avian collision with the conductor and its use may be counterproductive to the avian protection lmeasures inxluded as part of the Draft RMP.	The Proposed RMP/Final EIS has been adjusted to require non-reflective wire on lines greater than 230 KV.
Lands and Realty	Carl Albrecht Garkane Energy	It is our opinion that these requirements should be modified to include voltages up to 25 kV for burial, rather than the proposed 34.5 kV in order to provide safe working conditions. Please review the ennclosed articles and information (Enclosure).	The Final RMP/EIS will be updated to reflect a burial requirement of up to 24 kV.
Lands and Realty	Carl Albrecht Garkane Energy	The cost increase of burying lines is significant. Based on current material prices and trenching rates, Garkane estimates it will cost a project proponent 300 perecent more to construct an underground distribution line opposed to an overhead line. The maintenance costs are also increased and reliability of lines decreased with underground distribution line construction. The burial requirement of Alternative C is arbitrary and does not consider the effected resources, location, and environment of a proposed line. Underground distribution lines should only be considered when overhead lines cannot meet other resources objects. See Pages 2-89.	A range of alternatives must be considered in the RMP/EIS. All resource values will be considered in determining whether to require burying ROWs.
Lands and Realty	Dirk Clayson	Future right of ways and easements should not be restricted in the plan in large geographical areas. All easements for access, water right, fence maintenance, etc should be evaluated on their own merits and not restricted without evaluation.	Right-of-way restiction areas support specific resource concerns. Section 202 C, 2. FLPMA: Systematic interdicipinary approach to achieve integrated consideration of physical, biological, economic and other sciences.
Lands and Realty	ECOS Consulting	The width and extent of "Right-of Ways" and "Easements" proposed in the alternatives are too large and expansive to maintain functional ecosystems, viable unfragmented wildlife populations, natural vegetation communities, intact soil structure, and prevent widespread wind (dust) and soil erosion.	The Draft RMP/EIS identifies rights-of-way avoidance and exclusion areas based on resource and resource use concerns. The width of rights-of-ways is an implementation level decision that would be addressed on a case-by-case basis using site-specific NEPA analysis.
Lands and Realty	ECOS Consulting	In order to protect the ecological integrity of the Kanab Decision Area, it is recommended that all "rights-of-ways" and "easements" are limited to a maximum width of 100 meters or less, and that the total number be minimized.	The Draft RMP/EIS identifies rights-of-way avoidance and exclusion areas based on resource and resource use concerns. The width of rights-of-ways is an implementation level decision that would be addressed on a case-by-case basis using site-specific NEPA analysis.
Lands and Realty	ECOS Consulting	The BLM is being irresponsible in the future planning of ROW's when it recommends that 72% of the Decision Area be open to the cumulative potential of all these adverse impacts, that's almost 400,000 acres out of a total of 520,000 acres. This is not reasonable, and is another example of mismanagement by not dealing directly with the issues.	While 399,400 acres are available for rights-of-way development this does not necessarily mean that rights-of-way development will occur on any or all of these areas. Prior to application or authorization, site-specific NEPA analysis would be completed. The rights-of-way (ROW) exclusion and avoidance areas are based on resource concerns. In Alternative B, the ROW exclusion and avoidance areas are listed on page 2-88. Title V of FLPMA authorizes BLM to grant rights-of-way.

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Lands and Realty	ECOS Consulting	The BLM must limit all "right-of-ways" and "easements" to no more than 100 meters in width. The unlimited extent of "Right-ofWays" and "Easements" planned over 72% of the Decision Area in the preferred alternative is too large to maintain functional ecosystems, viable unfragmented wildlife populations, natural vegetation communities, intact soil structure, and prevent widespread wind (dust) and soil erosion.	The Draft RMP/EIS identifies rights-of-way avoidance and exclusion areas based on resource and resource use concerns. The width of rights-of-ways is an implementation level decision that would be addressed on a case-by-case basis using site-specific NEPA analysis.
Lands and Realty	ECOS Consulting	If the authorization of ROW's would have potential direct, indirect, and cumulative short- and long-term adverse impacts on wildlife, then there should be an in-depth analysis of these impacts on wildlife and an estimate of locations and extent of these impacts and what wildlife would be most impacted and how these impacts affect BLM species population goals.	Page 4-71 is the impact analysis common to all alternatives. Further detail on the impacts to fish and wildlife species from the authorization of rights-of-way (ROW) are discussed under each specific alternative.
Lands and Realty	Jana Hassett	The plan proposed alternative does not recognize the City of Escalante Water System and existing ROW's for the water mains currently crossing BLM lands within the management area. solution - These ROW's need to be added and acknowledged within the plan and recognize the need for vehicle access to all segments of the ROW for maintenance.	This is a site-specific ROW issue which is addressed in each ROW grant and in existing federal regulations.
Lands and Realty	Keith Robinson Kanab City Public Works	After looking over the Kanab Field Office Draft Resource Management Plan and Draft Environmental Impact Statement I would like to see the shaded area of the attached map designated as open for water development by Kanab City. Roads to the wells, water lines and power lines should also be allowed in this area. The BLM has worked with Kanab City over the years in helping developing our culinary water sources. Some of the above area is already within a Land Use Agreement to protect the Kanab City watershed.	In the RMP/EIS the areas are open and this type of development would be allowed unless site-specific NEPA analysis were to preclude it. BLM recognizes the land use agreement with Kanab City to protect their watershed.
Lands and Realty	Norman McKee	2 – 26: The BLM should take a very pro-active approach to make land trades with SITLA. Without trades, WSA's are in jeopardy, crucial wildlife habitat is compromised, and new roads and utility corridors are required as trust lands are privatized and developed within BLM lands.	The Final RMP/EIS has been modified to include the following objective in Chapter 2, page 2-26 "Give exchanges with the State of Utah priority consideration, particularly for inholdings."
Lands and Realty	PacifiCorp	Such activities (pole replacement, conductor and/or insulator replacement, etc.) would presumably occur within the company's existing transmission right-of way. However, the company must retain the right to service our existing power line(s) if maintenance is required within the restricted area(s) represented on the map.	Maintenance and emergency actions covered in existing right-of-way grants would not be affected by the RMP.
Lands and Realty	PacifiCorp	The Executive Summary (Pg. ES-I0) recommends limiting OHV use to "designated routes". Rocky Mountain Power generally concurs with this policy insofar as protecting natural and cultural resources. However, we also maintain an interest in reserving access to electrical facilities where needed to accommodate ongoing repair/maintenance and inspection needs.	Maintenance and emergency actions covered in existing right-of-way grants would not be affected by the RMP.
Lands and Realty	PacifiCorp	PacifiCorp recommends that BLM designate energy corridors in areas where PacifiCorp has submitted proposed corridors as part of the West-Wide Energy Corridor PEIS . We have attached a map that shows the locations of the proposed utility corridors contained in the draft EIS as compared to the locations of the proposed energy corridors that were submitted by PacifiCorp to the	The West-Wide Energy Corridor PEIS would amend the Kanab RMP when it is finalized.

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		Department of Energy for consideration as part of the PEIS. It should be noted that PacifiCorp's proposed energy corridors depicted on the map simply connect two end points of energy resource areas and areas of energy demand. We did not apply engineering design or environmental analysis when developing these options. An electronic version of this map is contained on the enclosed CD. PacifiCorp supports the establishment of energy corridors throughout the Kanab BLM Resource Area.	
Lands and Realty	PacifiCorp	Communication facilities may be adversely affected by siting additional communication facilities in close proximity. Recommended Revision!Action PacifiCorp recommends that the following statement be added to all of the alternatives, "The addition of new communications devices on existing towers will be considered where it is practical and does not present a safety or operational risk."	The Lands and Realty management actions have been revised to read: “The addition of new communications devices on existing towers or right-of-ways will be considered where it is practical and does not present a safety or operational risk.”
Lands and Realty	PacifiCorp	There are two places in the report that state to bury distribution power lines including Appendix A, Page 3, Mineral Exploration and Development, Bbullet 10 and Page 4 Reducing Impacts to Visual Resource Management Class II and III Areas, Bullet 1. PacifiCorp believes that these statements are overly restrictive and need to be qualified.	The Best Management Practices (BMPs) identified in Appendix A are techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts and negative environmental impacts from management actions. The lands and realty management actions in Chapter 2 allow for flexibility in applying these BMPs.
Lands and Realty	PacifiCorp	Timing Limitations are detailed for a variety of Resources of Concern in Table AC-I. PacifiCorp requires access to existing electric lines without restriction to perform emergency maintenance and repairs that may include rebuilding of structures within the line.	Maintenance and emergency actions covered in existing right-of-way grants would not be affected by the RMP.
Lands and Realty	PacifiCorp	Solar and wind powered renewal resources are becoming an increasingly important source of electric generation. No discussion of the potential for this development is included in this section.	The reasonable foreseeable development for renewable energy resources is addressed in Chapter 3 of the Draft RMP/EIS on page 3-93.
Lands and Realty	PacifiCorp	PacifiCorp recommends that the EIS and final RMP include a specific provision within the EIS and RMP stating that ROW facilities will not be placed adjacent to each other if issues with safety or incompatibility or resource conflicts are identified. The Western Electric Coordinating Council (WECC), a regional coordinating council for western utility groups, also supports this approach.	The Lands and Realty management actions have been revised to read: “The addition of new communications devices on existing towers or right-of-ways will be considered where it is practical and does not present a safety or operational risk.”
Lands and Realty	PacifiCorp	PacifiCorp recommends that the EIS and final RMP include a specific provision within the EIS and RMP stating that ROW facilities will not be placed adjacent to each other if issues with safety or incompatibility or resource conflicts are identified. The Western Electric Coordinating Council (WECC), a regional coordinating council for western utility groups, also supports this approach.	The Lands and Realty management actions have been revised to read: “The addition of new communications devices on existing towers or right-of-ways will be considered where it is practical and does not present a safety or operational risk.”
Lands and Realty	PacifiCorp	PacifiCorp is concerned that the EIS does not address electrical emergency situations. In an electrical emergency situation, PacifiCorp must be able to enter onto and conduct repairs or adjustments within a rights-of-way area governed by a ROW grant at any time.	Maintenance and emergency actions covered in existing right-of-way grants would not be affected by the RMP.
Lands and Realty	Shirley Fujimoto	Thus the BLM should prepare a Final EIS and revised RMP to encourage and	Page 2-26 of the Draft RMP/EIS states "Make public lands available for ROWs,

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	McDermott, Will & Emery	facilitate the siting of this infrastructure on federal lands in the Kanab Resource Area.	permits, and leases. The suitability for these land actions would be judged on a case-by-case basis."
Lands and Realty	Shirley Fujimoto McDermott, Will & Emery	By contrast, the BLM should not adopt Alternative C. The BLM should also not adopt the proposal under Alternatives B and D to require communication site plans for all existing communications sites before any new type os uses or new facilities would be authorized on these sites.	This requirement prevents the proliferation of commsite facilities and promotes the colocation of existing facilities.
Livestock Grazing	Dirk Clayson	Cross county motorized travel should not be eliminated for cattle maintenance and fence repairs. There may be a number of other items as well that require this access such as cedar post, mining, engineering, survey work, re-seeding, etc.	Administrative use for cross-country motorized travel is permitted for range improvement maintenance on a case-by-case basis. Other actions such as mining, engineering, survey work, re-seeding, etc. could require site-specific NEPA.
Livestock Grazing	ECOS Consulting	The DRMP does not analyze the serious short- and long-term adverse impacts from livestock grazing in desert environments.	Nearly all of the Kanab Field Office is comprised of semi-arid and montane climate and is not a true desert environment (less than 10 inches of annual precipitation) (http://pubs.usgs.gov/gip/deserts/what/). The Draft RMP/EIS analyzed short-term and long-term impacts from livestock grazing in the decision area.
Livestock Grazing	ECOS Consulting	Page 4-17, 3r d Paragraph: Actions that allow livestock trampling ofbiological soil crusts are not short-term and localized, as stated in this paragraph. It is well documented in the scientific literature that BSC's are easily destroyed by livestock trampling and that recovery time for BSC's can take from up to 300 years, depending on micro-site characteristics. With the loss ofBSC's from the trampling of livestock grazing the ecosystem would suffer the loss of many positive ecological functions. Thus the impacts are severe and long-term.	The analysis the commentor refers on page 4-17 of the Draft RMP/EIS discusses the impacts to all soil types in the decision area not just biological soil crusts. The analysis of impacts to soil resources in the Draft RMP/EIS is adequate.
Livestock Grazing	ECOS Consulting	Page 4-25, 5th Paragraph: The BLM must show how livestock grazing according to BLM Standards and Guidelines would eliminate long-term impacts. What specifically will the Standards and Guidelines direct the BLM to do in order to mitigate the effects of erosion from compacted soil, from the destruction of biological soil crusts, from vegetation loss, from the invasion of exotic species, from stream bank failure due to vegetation loss and erosion, and from direct fecal matter input into surface water?	The BLM Standards and Guidelines direct BLM to manage for rangeland health. The Standards and Guidelines are the best management practices (BMPs) for livestock grazing management. These BMPs are designed to attain or move towards attaining rangeland health standards.
Livestock Grazing	ECOS Consulting	If the BLM can, it must show the documentation that these conditions are indeed improving, and why they are improving. Or at least, the BLM must summarize this information in this DRMP/EIS, or provide a list of allotments or areas and their conditions and trends. There is a total lack of any of this kind of information in this DRMP/EIS. How is the public able to determine if the BLM is managing the range properly if there are no results, analyses, recommendations, or feedback from over 12 years of commitment to the Standards and Guidelines? There are a number of areas in the Decision Area that clearly do not meet the current BLM standards. What are the plans for those areas?	The Rangeland Health Assessments assess the condition of a given site in comparison to the four fundamentals of rangeland health. The results of the assessments were summarized in several areas throughout the Draft RMP/EIS chapter 3 (see section 3.2.3, Table 3-5, Table 3-6, and Table 3-9). These include the current assessment as well as the trend for those sites that were assessed as functioning at risk. The original forms from the Rangeland Health Assessments are located in the Kanab Field Office. The Draft RMP/EIS chapter 3 page 3-76 describes the regulatory process BLM is required to take for areas that fail to attain to one of the standards when the failure can be ascribed to livestock grazing.
Livestock Grazing	ECOS Consulting	The Kanab DRMP/DEIS fails to adequately address the negative direct, indirect, and cumulative effects of livestock grazing on the soils, vegetation, water quality, and stream functions within riparian areas.	Nearly all of the Kanab Field Office is comprised of semi-arid and montane climate and is not a true desert environment (less than 10 inches of annual precipitation) (http://pubs.usgs.gov/gip/deserts/what/). The Draft RMP/EIS analyzed short-term

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			and long-term impacts from livestock grazing in the decision area.
Livestock Grazing	ECOS Consulting	The DRMP should state what actions will be taken based on various drought conditions.	Chapter 2 of the Proposed RMP/Final EIS was revised to include a section on fire, drought, and natural disasters.
Livestock Grazing	Hal Hamblin	As the lessee for the Kinne Kernie (?) Springs alotment, I would to have the active AUM's available for use be looked into & possibly re-evaluated.	Moving AUMs from suspended use to active use is not a land use planning decision and is therefore beyond the scope of this NEPA document.
Livestock Grazing	Jeff, Kendalee, Mccrae, Buster and Maddie Cox C-4 Ranch	We have recently signed a long term lease agreement with the Barracks Ranch and are in the middle of leasing the poverty allotment, which places us smack dab in the middle of two proposed road closurs. The Poeverty and Steep Train roads are the only way to access water on these permits. As you well know, the watering hole is the focal point of cattle permits. We need the access to make frequent visits to make sure the cows are watering, and to monitor and maintain riparian areas.	There are exclusions based on administrative and official use. The exclusions are defined in 43 CFR 8340.0-5 and would include access to maintain or improve range improvements and other livestock management related needs.
Livestock Grazing	John Keeler Utah Farm Bureau Federation	Yet in Section 2-55 (Fish and Wildlife Management Actions) and 2-64 (Livestock Grazing Management Actions) you plan to reallocate AUMs from livestock to wildlife which is not consistent with the Taylor Grazing Act either. In fact, you mention that you are going to suspend 88 livestock AUMs and reallocate them to wildlife into the Water Canyon, Sawmill and Lower Northfork allotments under the various alternatives. Not only do we feel this action would be inconsistent but it may very well be a violation of the Act. We realize these are a very few number of AUMs but we feel it unwise for you to pursue the course of reallocating livestock AUMs to wildlife. These reallocations are also mentioned in Sections 4-113, 4-169 and 4-171 under "Cultural Impacts" and other places in the document.	The Draft RMP/EIS does not purport to reclassify lands as “chiefly valuable for grazing” as addressed in the Taylor Grazing Act. The BLM’s grazing regulations allow the BLM to adjust permitted livestock use in its RMPs: “Permitted livestock use shall be based upon the amount of forage available for livestock grazing as established in the land use plan…” (43 CFR 4110.2-2). The BLM’s planning handbook (BLM-H-1601-1) directs that RMP are to identify lands available or not available for livestock grazing, but these decisions only apply over the life of the plan and are reversible through a land use plan amendment. The planning handbook also directs that RMPs identify the amount of forage available for livestock (expressed in animal unit months). The Draft RMP/EIS provides a range of alternatives of lands available for livestock grazing. The alternatives address the allocation of the forage in the areas no longer available for livestock grazing over the life of the plan under a given alternative, which includes re-allocation to wildlife.
Livestock Grazing	Laura Kamala Grand Canyon Trust	We strongly urge BLM to keep livestock out of riparian areas to assure properly functioning conditions of these areas and especially during times when an already arid environment is stressed by drought.	It is BLM policy to monitor existing livestock use in riparian areas and the trend of resource condition and make necessary adjustments on an allotment or watershed basis. These actions are activity-based actions and are part of the implementation of an RMP to assure that Rangeland Health Standards are met, as well the other objectives of the RMP. Regulations at 43 CFR 4130.3 require that the terms and conditions under which livestock are authorized “ensure conformance with the provisions of subpart 4180,” the Standards for Rangeland Health and further 43 CFR 4130.3-1 require that “livestock grazing use shall not exceed the livestock carrying capacity of the allotment”.
Livestock Grazing	Laura Welp	I suggest that you include a plan for dealing with drought in the RMP. Drought is such a constant in this area that grazing management must have a plan to prepare for it, yet many field offices don't have a formal method in place.	Chapter 2 of the Proposed RMP/Final EIS was revised to include a section on fire, drought, and natural disasters.
Livestock Grazing	Merlin Esplin	Page ES-7, and other places discuss the idea of reallocating 48 animal unit months (AUM's) from livestock to wildlife. I am strongly opposed to this move and believe it is in direct conflict with the earlier agreements between resource	The BLM does not propose the permanent closure of allotments or portions thereof. However, certain allotments may not be available for grazing over the life of the plan. The allotments considered, as not available are spread by alternative.

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		managers, ranchers, and wildlife managers. Wildlife AUM's were allocated early on. There is no need for reallocations of this sort now or ever. Are the AUM's for wildlife on table 3-24, new allocations or existing? Wording in the text below table 3-24 indicates AUM's are over allocated - if this is the case they should not be transferred to wildlife. Once the range recovers from drought AUM's could be reallocated to livestock as per the intent of the Taylor Grazing Act.	Subsequent revisions of the land use plan may consider opening these areas to livestock grazing.
Livestock Grazing	Merlin Esplin	Secondly, there is a statement about combining allotments. I believe this statement is out of place in the RMP, at least until affected permittees have had the opportunity to respond (which they have not in this case). If the allotments are held by the same permittee this may not be much of an issue, however if the allotments are held by different people it may be a very serious issue . Does this action even need to be included in the RMP?	The BLM concurrs that changing allotment boundaries is not normally a land use plan decision. However, this action is taking place in this NEPA document for administrative convenience. The permittees associated with the allotments in question have been contacted and have offered no objection.
Livestock Grazing	Merlin Esplin	On page 2-67 I have great concerns about the language consistent with all action alternatives under Grazing Management Practices. Under "Allocation of Relinquished Preference for Livestock Forage" the language is confusing and appears to favor a permittee desiring to sell to a non-bonified livestock operator, because he may choose to relinquish all or part for no reason at all. It looks like a loop hole to get around the intent of the Taylor Grazing Act, and could possible be used as another tool to remove livestock from the public lands. Please review the wording very carefully and ensure BLM's meaning is clearly stated and consistent with law and policy.	The relinquishment language on page 2-67 gives priority to livestock grazing and is consistent to law, regulation, and policy.
Livestock Grazing	Randy Parker Utah Farm Bureau Federation	Allocation of resources for wildlife was previously addressed. Farm Bureau opposes reallocation of livestock AUM's to wildlife.	The Draft RMP/EIS does not purport to reclassify lands as “chiefly valuable for grazing” as addressed in the Taylor Grazing Act. The BLM’s grazing regulations allow the BLM to adjust permitted livestock use in its RMPs: “Permitted livestock use shall be based upon the amount of forage available for livestock grazing as established in the land use plan…” (43 CFR 4110.2-2). The BLM’s planning handbook (BLM-H-1601-1) directs that RMP are to identify lands available or not available for livestock grazing, but these decisions only apply over the life of the plan and are reversible through a land use plan amendment. The planning handbook also directs that RMPs identify the amount of forage available for livestock (expressed in animal unit months). The Draft RMP/EIS provides a range of alternatives of lands available for livestock grazing. The alternatives address the allocation of the forage in the areas no longer available for livestock grazing over the life of the plan under a given alternative, which includes re-allocation to wildlife.
Livestock Grazing	Randy Parker Utah Farm Bureau Federation	Suggestions within the RMP that reduced grazing decreases erosion is contrary to science. Most of the soils are heavy clay, resisting water infiltration. Grazing disturbs the surface crust, allowing moisture into the soil and fertilizer perpetuating plant germination.	Proper grazing management can have many beneficial results. Page 4-37 of the Draft RMP/EIS acknowledges: “Proper grazing could improve the ecological conditions of upland communities by reducing vegetation removal, decreasing erosion, and reducing opportunities for establishment of noxious weeds and invasive species.” The Draft RMP/EIS also acknowledges that concentrated livestock grazing could have localized and short-term disturbances.

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Livestock Grazing	Rebecca Mann	Rangeland assessment. Science-based ecological assessments, using standardized data collection methods such the Rangeland Health Indicator system, should be regularly conducted to determine if allotments are being properly managed and not overgrazed. Unfortunately, I haven't looked into current methods being used, but wish to express my concern that the assessments be standardized, regularly conducted, and that the data collected is regularly analyzed with results utilized in an adaptive management program. Rangeland that is not properly maintained and is over-exposed to grazing, risks undergoing an irreversible transition to a degraded state, creating ecological problems such as erosion and top soil loss, loss of plant, animal, and microbial biodiversity, exotic weed invasion, and altered fire regimes. To best ensure the long-term viability of rangelands, regular ecological assessments should be a part of an adaptive management program.	It is BLM policy to monitor existing livestock use levels, forage utilization, and the trend of resource condition and make necessary adjustments on an allotment or watershed basis. These actions are activity-based actions and are part of the implementation of an RMP to assure that Rangeland Health Standards are met, as well the other objectives of the RMP. Regulations at 43 CFR 4130.3 require that the terms and conditions under which livestock are authorized “ensure conformance with the provisions of subpart 4180,” the Standards for Rangeland Health and further 43 CFR 4130.3-1 require that “livestock grazing use shall not exceed the livestock carrying capacity of the allotment”.
Livestock Grazing	Western Watersheds Project, Inc.	BLM has provided no science to show that livestock grazing reduces spread or severity of fire . To the contrary, if BLM had troubled itself to look, livestock grazing increasesfire severity. Where is the science to support the myth that grazing cheatgrass reduces cheatgrass?	BLM resource specialist knowledge of the area supports that livestock grazing can decrease fine fuel loading and has the potential to decrease fire severity on some areas with a cheatgrass component when grazing is conducted as proposed in Chapter 2.
Livestock Grazing	Western Watersheds Project, Inc.	The Kanab FO should conduct a capability analysis to determine the areas that might be available for livestock grazing, excluding steep slopes >30%, low forage production <200 lbs/areas, ecosystems converted by wildfire or invasive weeds, and the ability of sensitive soils to respond following impacts (arid elevations, reclamation, soil chemistry, drought).	According to the Land Use Planning Handbook (BLM-H-1601-1) the Draft RMP/EIS identifies lands available or not available for livestock grazing and considered the following factors: a. Other uses for the land. b. Terrain characteristics. c. Soil, vegetation, and watershed characteristics. d. The presence of undesirable vegetation, including significant invasive weed infestations. e. The presence of other resources that may require special management or protection, such as special status species, Special Recreation Management Areas (SRMAs), or ACECs. The alternatives considered different management options based on resource protection for some allotments.
Livestock Grazing	Western Watersheds Project, Inc.	The DEIS does not present an allotment by allotment summary of current monitoring information that describes the trend or condition as compared to the existing RMP.	The Rangeland Health Assessments assess the condition of a given site in comparison to the four fundamentals of rangeland health. The results of the assessments were summarized in several areas throughout the Draft RMP/EIS chapter 3 (see section 3.2.3, Table 3-5, Table 3-6, and Table 3-9). These include the current assessment as well as the trend for those sites that were assessed as functioning at risk. The original forms from the Rangeland Health Assessments are located in the Kanab Field Office. The Draft RMP/EIS chapter 3 page 3-76 describes the regulatory process BLM is required to take for areas that fail to attain to one of the standards when the failure can be ascribed to livestock grazing.
Maps	Barry Clarkson Clarkson Draper & Beckstrom, LLC	Finally upon my review of the maps included it has become apparent that there are errors in the maps as to which land falls under the RMP and in fact which land is public. For example, Map 2-16 shows that the BLM Property extends to the Arizona border between the Kanab City area and property owned by my client. This is incorrect. There is a strip of land along the Arizona border which is private and belongs to my client and his successors in interest. I have attached a	The BLM acknowledges that T44S R7W sec. 2 and the strip of land along the Arizona border is private land. The surface management status data for the Draft RMP/EIS is 1:100,000 and make it difficult to see smaller tracts of land.

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		set of maps which clearly show this to be true.	
Maps	BLM - Arizona Strip Field Office	Map 2-44, General Surface Disturbance Restrictions, Alternative B Why is the Paria Canyon-Vermilion Cliffs Wilderness indicated on this map with "seasonal restrictions" for surface disturbance restrictions? Is this to accommodate fire use? Why would the wilderness not be classified as "no surface disturbing actions?"	The Draft RMP/EIS Map 2-44 shows decisions that address seasonal limitations or no surface disturbance for all surface disturbing actions, as defined in the Draft RMP/EIS Glossary. Designated wilderness areas and wilderness study areas do not contain a specific restriction on all surface disturbing activities. Rather, for designated wilderness management actions are required to undergo a minimum tool analysis before implementation. Wilderness study areas are required to meet the non-impairment standard described in the Interim Management Policy for lands under Wilderness Review. The likelihood of a surface disturbing activity being permitted under these policies is low, but there is no absolute restriction on surface disturbing actions. Draft RMP/EIS Maps 2-43 through 2-46 reflect this.
Maps	Capital Trail Vehical Association	The maps and figures are not easily understood. There are no identifiable or named features and no road and trail numbers on the maps. It is very difficult for the public to orient themselves and to interpret the proposed action for each specific road and trail. Therefore, the public cannot adequately evaluate the proposal and cannot develop comments with reference to specific roads and trails.	The maps in the Draft RMP/EIS were generated at the best practical scale to convey the decisions being made for the size of the publication. In addition, large-scale maps at a 1:24,000 scale were provided for review in a paper format at the five public meetings for the Draft RMP/EIS and at the Field Office. These maps were also provided on compact disk during the public meetings and at the Field Office, at request. Commentors seeking more specific detail concerning route identification exercised these option several times, and subsequently provided very detailed comments on a route-by-route basis.
Maps	John Veranth	For the record, I will state that the RMP maps available online were inadequate to allow proper public comment. The scale of the map, the lack of background transportation and culture information, and the resolution of the file preclude figuring out where the proposed designated route is in many cases even when viewed at 800%. For Example In Alt B, the OHV route on private land east of Escalante appears to be the start of the Boulder Mail Trail, but could also be another route farther west or could be one of the vehicle tracks heading from Hwy 12 to the monument boundary. Likewise, to the west of Escalante it appears that one route is the Middle Canyon Road, but it could be something else. Since one cannot tell the exact route alignment, it is impossible to comment on the impact this route would have on the adjacent Federal land. The combination of low and high resolution maps as was used in the Moab RMP was a much better approach.	The maps in the Draft RMP/EIS were generated at the best practical scale to convey the decisions being made for the size of the publication. In addition, large-scale maps at a 1:24,000 scale were provided for review in a paper format at the five public meetings for the Draft RMP/EIS and at the Field Office. These maps were also provided on compact disk during the public meetings and at the Field Office, at request. Commentors seeking more specific detail concerning route identification exercised these option several times, and subsequently provided very detailed comments on a route-by-route basis.
Maps	Laura Welp	The boundary in the nominated map is not the same as the map I submitted (see map on page 11 of attachment). My original boundary is much closer to the boundary you determined was eligible for ACEC designation.	The ACEC proposal provided during scoping did not include a map boundary, but included a legal land description. When the BLM identified the legal description on a map (see Draft RMP/EIS Appendix H Map 1), the BLM's ID team determined that the nominated relevant and important values existed in a different polygon (see Draft RMP/EIS Appendix H Map 2). The polygon on the map from page 11 of the commentor's comment on the Draft RMP/EIS is from a BLM-generated draft document that was considered in determining the proposed ACEC boundary in Alternative C that includes the relevant and important values.
Maps	National Parks	With the exception of Map 1-01 Landownership, the maps do not show the	The maps associated with the Kanab RMP are designed to reference the land

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	Conservation Association	national park boundaries for parks within or adjacent to the planning area. Without this information it is impossible to evaluate the impacts on the affected national parks and their resources. BLM must provide adequate mapping so that the impacts of their alternatives may be analyzed by the public.	owernship map. The boundaries of the National Park Service are clearly defined on the land ownership map.
Minerals and Energy	Bryce Canyon National Park	"Under no circumstances should this decision become the only basis for protection of the values for which Bryce Canyon National Park was established and I direct that these park values be taken into account in future decisions by the bureaus of this Department on mining plans, permit applications for other activities on undesignated Federal lands near the park." (Emphasis added). We believe that the intent and specifics of the Secretarial Order should be noted in the Resources Management Plan.	The document has been changed to reflect the commentor's clarification.
Minerals and Energy	Mark Sterkel	BLM should provide in the RMP for a buffer zone around Zion, Bryce, and Grand Staircase Natl Parks. I mile should be considered a minimum, where no locatable or leasable energy or mineral drilling or mining should be allowed. The DRMP affords the Springdale/Virgin watershead far less protection than it does for it's own Kanab watershed.	An arbitrary buffer around Zion and Bryce Canyon National Parks and the GSENM would be contrary to BLM's multiple-use mandate as defined by FLPMA. The Draft RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near the park include restrictions on surface disturbing activities and resource uses address the issues raised. Concerning the Springdale/Virgin watersheds, under the Proposed RMP these areas are largely within WSAs, WC areas, or "wild" wild and scenic rivers, and are therefore either closed to oil and gas leasing or have no surface occupancy stipulations. Kanab and Fredonia specifically requested that BLM manage the public lands around their water collection systems (not their entire watersheds). Springdale has not requested BLM to manage Kanab Field Office lands to protect their water collection systems. This was not raised as an issue during the public scoping period.
Minerals and Energy	SUWA	The BLM must more fully quantify this risk, as well as the potential for mineral recovery (and the likely amounts to be recovered) and compare them to the gains to the environment from the most well-balanced alternative, Alternative C.	The Mineral Potential Report provides a reasonable foreseeable development scenario for mineral development and the associated projected disturbance. This information is incorporated into Chapter 4 of the Draft RMP/EIS which describes the impacts from mineral development on other resources and resource uses. Under FLPMA's multiple-use mandate, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple-use concept, the BLM does not necessarily manage every value and use on every acre, but routinely manages

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			many different values and uses on the same areas of public lands.
Minerals and Energy	SUWA	However, the Kanab Draft RMP evaluates an unjustifiably inflated reasonably foreseeable development scenario of ninety wells over a twenty-year period - or 4.5 wells per year. Id at 3-90, 4-198. This rate is nearly four times the historic average for the Kanab Field Office, including surface lands managed by the U.S. Forest Service. Although oil and gas development may be subject to fluctuations, the reasonably foreseeable development scenario significantly exceeds the historical reality ofthe planning area.	The commentor does not provide an alternative source or method to refine the reasonable foreseeable development scenario (RFD). The RFD was developed not only based on historic data, but was also developed based on projected economic trends and advances in technology. The Utah Geological Survey used the best available data to develop the RFD.
Minerals and Energy	SUWA	One shortcoming common to every alternative analyzed in the Kanab Draft RMP is that the BLM has not endeavored to match oil and gas leasing stipulations with actual known geologic reserves of oil and gas and areas of historical development.	BLM is not required to develop stipulations that match actual known geological reserves of oil and gas. Instead, oil and gas leasing stipulations are developed to protect other resources and resource uses.
Minerals and Energy	SUWA	The BLM provides no justification for this figure. Inexplicably, the RFD actually excludes the past twenty years from its calculations, seemingly for no other reason than because recent figures have been low.	The commentor does not provide an alternative source or method to refine the reasonable foreseeable development scenario (RFD). The RFD was developed not only based on historic data, but was also developed based on projected economic trends and advances in technology. The Utah Geological Survey used the best available data to develop the RFD.
Minerals and Energy	SUWA	Kanab Draft RMP at 3-90, 4-198. This RFD scenario is arbitrary, capricious, and unrealistic. No twenty-year period in the history of the planning area has ever seen such a high rate of development.	The commentor does not provide an alternative source or method to refine the reasonable foreseeable development scenario (RFD). The RFD was developed not only based on historic data, but was also developed based on projected economic trends and advances in technology. The Utah Geological Survey used the best available data to develop the RFD.
Minerals and Energy	SUWA	The BLM must develop a new reasonably foreseeable development scenario that is historically accurate and actually tied to productive oil and gas fields. The present method completely ignores historical trends and declining production. None of the alternatives close certain. environmentally sensitive areas that should be closed, which hold little or no oil and gas production potential and are mostly unleased.	The commentor does not provide an alternative source or method to refine the reasonable foreseeable development scenario (RFD). The RFD was developed not only based on historic data, but was also developed based on projected economic trends and advances in technology. The Utah Geological Survey used the best available data to develop the RFD.
Minerals and Energy	SUWA	The BLM has never had before it the possibility of totally abandoning oil and gas leasing in the Kanab planning area, something it is required to do. See Bob Marshall Alliance, 852 F.2d at 1228.	Chapter 2 of the Proposed RMP has been modified to include consideration of a no oil and gas leasing alternative.
Minerals and Energy	SUWA	The BLM must take a hard look at whether any actual trade off exists between the preferred alternative and the additional protections of an alternative that include all of the closures and stipulations found in Alternative C as well as the additional closures and stipulations recommended above. The Kanab Draft RMP already states that none of the current alternatives would result in any changes to the RFD.	Alternative C emphasizes the protection/preservation of natural resources. The impacts upon natural resources from the various mineral alternatives are fully described in Chapter 4. The BLM contends that a hard look was taken.
Minerals and Energy	SUWA	The BLM should modify the alternatives, particularly Alternative C, so that they will close additional environmentally sensitive areas to leasing - or to surface occupancysince such closures are unlikely to limit feasible oil and gas production	The resources the commentor cites for protection (e.g., WSAs, big game habitat, Mexican spotted owl habitat) have varying degrees of protection in the Proposed Plan from oil and gas development. For example, WSAs are closed to oil and gas

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		in the planning area. The BLM should either close to leasing or impose no surface occupancy restrictions on the entire area south of U.S. 9 and west of U.S. 89. Though no current leases exist in this area, it is an extremely environmentally sensitive and deserving of protection from these damaging activities. The area contains the following important resources: three WSAs and additional non-WSA lands with wilderness characteristics, an area of relict vegetation, critical habitat of the Mexican spotted owl, crucial and high value mule deer habitat, elk habitat, crucial desert bighorn sheep habitat, and numerous proposed ACECs. Kanab Draft RMP at Maps 2-39,3-4,3-8,3-10,3-11,3-12,3-15,318. Furthermore, the National Park Service has expressed concern that leasing in this area could damage the Navajo Aquifer; the BLM should not offer for lease any lands overlying the Navajo Aquifer because ofthe resulting degradation that could occur in Zion National Park. See Letter from Martin C. Ott, Superintendent, Zion National Park, National Park Service, to Barbara Sharrow, Acting Field Office Manager, Kanab Field Office (Jan. 4, 2002) (attached as Attachment RR). The BLM should also close to leasing or place no surface occupancy restrictions on all lands east of U.S. 89 and south ofthe road running from Glendale to the Skutampah road. No current leases exist in this area, it contains non-WSA lands with wilderness characteristics, is home to areas ofrelict vegetation and fragile soils, contains crucial and high value mule deer habitat, contains elk habitat, and has numerous proposed ACECs. Kanab Draft RMP at Maps 2-39,3-4,3-10,3-11,3-15,3-18. In addition, all lands containing critical habitat for the Mexican spotted owl on the western edge ofthe planning area should either be closed to leasing or restricted to no surface occupancy (T39-43S R8-9W). See id. at Map 3-8. Furthermore, the BLM should either close to leasing or place no surface occupancy stipulations on greater sage-grouse brooding areas and winter range. See id. at Map 3-9.	leasing, big game habitats have seasonal restrictions, and Mexican spotted owl habitat has no surface occupancy stipulations. In addition, several areas of non-WSA lands with wilderness characteristics have been included in the Proposed Plan with no surface occupancy stipulations. Under FLPMA's multiple-use mandate, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple-use concept, the BLM does not necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands.
Minerals and Energy – Leaseable	PacifiCorp	Section 4.2.11 discusses the allowed development of Oil and Gas and mineral exploration and production but does not discuss the connected action of electric transmission right-of-way (ROW) to serve these developments.	The reasonable foreseeable development assumes that each well pad would disturb approximately 4 acres. This estimate includes the connected action of electric transmission right-of-way to serve these developments.
Minerals and Energy – Leaseable	Theodore Roosevelt Conservation Partnership	Given the nature of leasing and the need for upfront comprehensive planning) it needs to be known during the RMP process how the Kanab Field Office will establish plans for mitigation) including detailed fish and wildlife monitoring and the use of adaptive management strategies to prevent, minimize or mitigate impacts of oil and/or gas exploration and development for future parcels offered for leasing,	The Kanab Field Office will establish plans for mitigation, including detailed fish and wildlife monitoring and the use of adaptive management strategies to prevent, minimize or mitigate impacts of oil and/or gas exploration and development for future parcels offered for leasing during the site specific NEPA stage for each proposed lease parcel.
Minerals and Energy – Leaseable	Walter Fertig	Oil and gas leasing: Alternative B is an improvement over the existing condition in which nearly all BLM lands in the immediate vicinity of Kanab are open to oil and gas leasing under standard terms and conditions. While Alternative B would impose more stringent leasing constraints (such as No Surface Occupancy), the preferable solution would be to close these areas to leasing entirely, as proposed in Alternative C. These areas have very low oil and gas potential and have higher	An arbitrary buffer around Zion and Bryce Canyon National Parks and the GSENM would be contrary to BLM's multiple-use mandate as defined by FLPMA. The Draft RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with

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		significance to the local community as a watershed and for scenic values. Likewise, the Kanab FO should consider lease closure in the areas adjacent to Zion National Park (especially near the NE corner of the park) within the watershed for Springdale. Alternative B leaves much of this area open to leasing subject to moderate constraints, while Alternative C would close these areas of minor oil and gas probability to leasing.	the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near the park include restrictions on surface disturbing activities and resource uses address the issues raised. Concerning the Springdale/Virgin watersheds, under the Proposed RMP these areas are largely within WSAs, WC areas, or “wild” wild and scenic rivers, and are therefore either closed to oil and gas leasing or have no surface occupancy stipulations. Kanab and Fredonia specifically requested that BLM manage the public lands around their water collection systems (not their entire watersheds). Springdale has not requested BLM to manage Kanab Field Office lands to protect their water collection systems. This was not raised as an issue during the public scoping period.
Non-WSA Lands with Wilderness Characteristics	Bill May	I do not believe that the BLM should create artificial wilderness by designating it As an area with Wilderness Characteristic areas ... I believe the BLM should seek Out alternate methods to manage and protect the land, without giving it a WC Designation... I believe that some WC areas such as Sheep Springs, Four Mile Creek and Kanab Creek have been improperly inventoried and should not receive Such recognition. These areas have historically used machine built roads.	As part of BLM’s wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	Bill May	Calling a new WSA by a different name does not make it legal. 2) Please disclose the difference in management prescriptions between "non-WSA lands with wilderness characteristics" and WSAs in the Final Environmental Impact Statement (FEIS). 3) The 1999 inventory found lands that contain extensive OHV trails to have "wilderness characteristics." If the presence ofOHV use did not impact the presence or absence of "wilderness characteristics," then by what rationale is the BLM proposing to significantly reduce OHV trails in these areas? 4) The Supplemental Environmental Impact Statement (SEIS) is utilizing the Utah BLM 1999 statewide wilderness re-inventory. This inventory was based on criteria that were not available for public comment and review.	The Proposed RMP/Final EIS has been changed to include management of five areas of non-WSA areas with wilderness characteristics (27,770 acres). In the Proposed RMP/Final EIS, motorized travel in these areas is limited to designated routes.
Non-WSA Lands with Wilderness Characteristics	Bill May	I believe that some WC areas such as Sheep Springs, Four Mile Creek and Kanab Creek have been improperly inventoried and should not receive Such recognition. These areas have historically used machine built roads.	As part of BLM’s wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	BLM - Arizona Strip Field Office	Page 2-4, under Alternative B, the Preferred Alternative, states "Require no prescriptions specifically to maintain WC areas." Why are there no prescriptions to maintain wilderness characteristics areas in the preferred alternative? Page 2-	The Proposed RMP/Final EIS has been changed to include management of five areas of non-WSA areas with wilderness characteristics (27,770 acres).

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		23 lists the objective for management of non-WSA lands with wilderness characteristics as "Maintain wilderness characteristics (appearance of naturalness, outstanding opportunities for solitude, or primitive and unconfined recreation) of WC areas, as appropriate. Manage these primitive and backcountry landscapes for their undeveloped character and to provide opportunities for primitive recreational activities and experiences of solitude, as appropriate." How can this objective be obtained when there are no management actions in the Preferred Alternative to do this?	
Non-WSA Lands with Wilderness Characteristics	BLM - Arizona Strip Field Office	The discussion on pages 2-59 and 2-60 addresses management of non-WSA lands with wilderness characteristics. Several of the areas included for management to maintain wilderness characteristics under Alternative C are areas that were determined to not have these characteristics, such as Black Hills and Heaps Canyon. Why would these areas be managed for characteristics they do not possess? In addition, the Alternative C text should make it clear that only portions of other wilderness characteristics areas (those parts determined to have wilderness characteristics) would be managed to maintain those characteristics.	The Black Hills, Heaps Canyon, Little Valley Canyon, North Escalante Canyons, and Paria/Hackberry areas were incorrectly added to Chapter 2 of the Draft RMP/EIS. As described on page 3-67 of the Draft RMP/EIS, these five areas were not found to have wilderness characteristics and should not have been included in Chapter 2. The Proposed RMP/EIS has been revised accordingly.
Non-WSA Lands with Wilderness Characteristics	BLM - Arizona Strip Field Office	There is a contradiction in decisions in Chapter 2. Page 2-91 states that Alternatives B, C, and D would "Retain non-WSA lands with wilderness characteristics in federal ownership." However, pages 2-59 and 2-60 indicate this is only true for Alternative C since alternatives B and D would "Require no prescriptions specifically to maintain wilderness characteristics areas."	While there are no specific management prescriptions in the Draft RMP/EIS to protect wilderness characteristics for non-WSA lands with wilderness characteristics (Alternative B and D), there is a lands and realty decision to retain lands with wilderness characteristics in federal ownership. In the Proposed RMP/Final EIS there are five areas (27,770 acres) to be managed as non-WSA lands with wilderness characteristics.
Non-WSA Lands with Wilderness Characteristics	Capital Trail Vehicle Association	There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the "603 Process" was completed, the agency was done with its Wilderness review. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSA's, the BLM should have no part in this issue. To do so is a tragic loss of management resources.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including

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			wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Dale Grange	I strongly object to the creation of areas with wilderness characteristics (WCs). This is simply a hollow way of creating new WSAs where that authority expired in 1991! The BLM should not be creating areas that will be managed in the same ways as existing WSAs. Before BLM creates such areas, it should be necessary to explain in detail how the management of these two types of lands will differ and have public comment before the fact, not after. It is always disappointing to see how closely BLM areas for WC follow the boundaries that the more extreme environmental groups (SUWA) are proposing for wilderness. Creating these areas is really only one more step toward making them permanent wilderness. One big problem with this is that most areas being considered as having WC already have motorized travel occurring. If this type of use does not disqualify these areas from having WC, then these kinds of uses must not be so bad!	The Black Hills, Heaps Canyon, Little Valley Canyon, North Escalante Canyons, and Paria/Hackberry areas were incorrectly added to Chapter 2 of the Draft RMP/EIS. As described on page 3-67 of the Draft RMP/EIS, these five areas were not found to have wilderness characteristics and should not have been included in Chapter 2. The Proposed RMP/EIS has been revised accordingly.
Non-WSA Lands with Wilderness Characteristics	David Armbruster	Regarding definition of Non-Wilderness Areas with Wilderness Characteristics, the U.S. District Court decided that Congress requires the U.S. Forest Service by law to maintain a balance between wilderness protection and motorized use in authorized Wilderness Study Areas. On BLM managed lands, given that Congress rightly expected continued motorized use in WSAs, there is no legal basis by which the BLM is attempting to exclude motorized use by including a new category for Non-Wilderness Areas with Wilderness Characteristics.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to

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			provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM’s Land Use Planning Handbook (H-1601-1) directs BLM to “identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics.” Finally, the Utah v. Norton Settlement Agreement does not affect BLM’s authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Desiree Smith	I do not believe that Far Mile Creek, Kanab Creek, and Sheep Springs Road should not considered wilderness places because they all have roads that run through them that lead to trails.	As part of BLM’s wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	Don Black Canyon Country 4x4 Club	Although Alternate B "Requires no prescriptions specifically to maintain WC areas." We oppose having the designation of Non WSA Lands with Wilderness Characteristics. The Map 3-15 and table 3-22 should not be included as part of this process. Congress gave very specific instructions to the BLM regarding Wilderness. Those instructions are contained in Section 603 of FLPMA. There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing Wilderness inventory and review. Managing WC areas as shown in Alternate C to specifically maintain wilderness characteristics, does not meet the multiple use and sustain yield mandate.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM’s authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM’s organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary’s authority to manage lands as necessary to “achieve integrated consideration of physical, biological, economic, and other sciences.” (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land, and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior

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			to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Don Black U4WDA	Although Alternative B "Requires no prescriptions specifically to maintain WC areas." U4WDA opposes having the designation of Non WSA Lands with Wilderness Characteristics. The Map 3-15 and table 3-22 should not be included as part of this process. Congress gave very specific instructions to the BLM regarding Wilderness. Those instructions are contained in Section 603 of FLPMA. There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing Wilderness inventory and review.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect

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			BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Five County Association of Governments	Wilderness inventories ended pursuant to the provisions of FLPMA. BLM identified lands with wilderness qualities, and has forwarded these recommendations to Congress. The final RMP should limit wilderness management to formally designated wilderness areas and wilderness study areas. Subsequent inventories, especially those conducted by non-professional special interest groups should not hold any credence in management actions laid out in the final RMP.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Frank and Kaye Alleman	We also don't think you have the authority to create areas of Wilderness Characteristics in non WSA lands.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect

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			lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Geno Ramsey Canyon Country 4x4	I do not believe that the BLM should create artificial wilderness by designation it as an area with Wilderness Characteristic areas. I believe the BLM should seek out alternate methods to manage and protect the land, without giving it a WC designation. I believe that some WC areas such as Sheep Springs, Four Mile Creek and Kanab Creek have been improperly inventoried and should not receive such recognition. These areas have historically used machine built roads. (NOTE: If approved as WC areas, this land would basically be locked up just like a Wilderness Study Area, without the act of Congress needed to legally make Wilderness. Naming these lands as such is one step closer to them becoming full-blown Wilderness, not necessarily a bad thing in every case, but a step that shouldn't be included in this RMP nor be performed by the BLM.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness	James & Lorna Sills	Non WSA Lands With Wilderness Characteristics (WC) Congress gave very specific instructions to the BLM regarding Wilderness. Those instructions are	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public

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Characteristics		contained in section 603 ofFLPMA. There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing Wilderness inventory and review. Therefore the Map 3-15 and table 3-22 should not be included as part of this process.	lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Jan Kobialka	Areas of wilderness character contiguous to Zion National Park should be closed to ORVs, because Zion visitors often hike in these areas, as our friends did on their last trip. These include Parunuweap Canyon, Canaan Mountain and Moquith Mountain. Please close the Moquith Mountain ORV loop and keep ORVs out of the Coral Pink Sand Dunes, a beautiful area that should be managed for unspoiled character. Areas near the town of Kanab also need to be closed against the growing impacts of ORVs - Vermilion Cliffs, Upper Kanab Creek, and Moquith Mountain.	The Proposed RMP/Final EIS has been changed to include management of five areas of non-WSA areas with wilderness characteristics (27,770 acres).
Non-WSA Lands with Wilderness Characteristics	Jerry & Cindy Foote	I believe that the BLM is establishing new wilderness areas without the authority to do so. To manage areas that have "wilderness characteristics" as WSAs is illegal. If these "wilderness characteristic" areas are based on the Utah BLM	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September

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		1999 statewide wilderness re-inventory then these areas have no standing as this re-inventory was performed without public oversight, comment or review. Further, those areas claimed to have "wilderness characteristics" may not be managed as WSAs and OHV travel in these areas may not be restricted. Further still, these non-WSA "wilderness characteristic" areas are being managed and considered part of the Kane County General Plan for the citizens of Kane County.	2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Jimmy Page U4WDA & Wasatch Cruisers	*3 areas that are classified w/ wilderness characters" (Sheep Springs, four mile creek, Kanabe creek) have machine created Roads! These areas are in use right now.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	Joan Thacher	The DRMP has designated this area as having Wilderness Characteristics but again you are giving it no special protection. Where are hikers such as myself to go close to Kanab where we can still enjoy some solitude? I used to hike in Hog Canyon, but not anymore.	The Proposed RMP/Final EIS has been changed to include management of several non-WSA areas with wilderness characteristics for those characteristics. Additionally, there are several SRMAs with RMZs managed for non-motorized recreation experiences.
Non-WSA Lands with	Land Use Volunteers	Given the wilderness quality of most of this land, it is inappropriate to place	Motorized routes in non-WSA lands with wilderness characteristics are not

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Wilderness Characteristics	of Kane County	designated transportation routes in the area. No designated routes should be placed within the areas identified to be of wilderness quality by the 1999 BLM Wilderness Inventory.	necessarily contrary to the management objectives. The impact analysis in Chapter 4 of the Draft RMP/EIS addresses impacts from motorized use on wilderness characteristics.
Non-WSA Lands with Wilderness Characteristics	Laura Welp	Allowing motorized use in these areas is contrary to these objectives, so the alternatives A, B, and D are in conflict with these objectives.	Motorized routes in non-WSA lands with wilderness characteristics are not necessarily contrary to the management objectives. The impact analysis in Chapter 4 of the Draft RMP/EIS addresses impacts from motorized use on wilderness characteristics.
Non-WSA Lands with Wilderness Characteristics	Marlin Sharp Lone Peak 4 Wheelers	I believe that some WC areas such as Sheep Springs, Four Mile Creek and Kanab Creek have been improperly inventoried and should not receive such recognition ... These areas have historically used machine built roads.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	Merlin Esplin	Is BLM required by law to discuss "Non-WSA Lands with Wilderness Characteristics"? It looks like another defacto wilderness attempt which does not need space on paper. BLM, again, has authority to administer the kinds of uses and activities permitted on public lands. It is enough.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect

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			BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Michelle Young	I do not feel the BLM has the Authority to create Wilderness Characteristic Areas.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Name not legible	I do not feel the BLM has the authority to create wilderness Characteristic Areas.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect

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			lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Non-WSA Lands with Wilderness Characteristics	Nate Delaney	Please disclose the difference in management prescriptions between "non-WSA lands with wilderness characteristics" and WSAs in the Final Environmental Impact Statement (FEIS).	The difference between non-WSA lands with wilderness characteristics (page 2-60) and WSAs is discussed in Chapter 2 of the Draft RMP/EIS. The Proposed RMP/Final EIS includes the management prescriptions for non-WSA lands with wilderness characteristics and the WSAs will continue to be managed according to the IMP.
Non-WSA Lands with Wilderness Characteristics	Nate Delaney	The 1999 inventory found lands that contain extensive OHV trails to have the "wilderness characteristics." If the presence of OHV use did not impact the presence or absence of "wilderness characteristics," then by what rationale is the BLM proposing to significantly reduce OHV trails in these areas?	The Proposed RMP/Final EIS has been changed to include management of five areas of non-WSA areas with wilderness characteristics (27,770 acres). In the Proposed RMP/Final EIS, motorized travel in these areas is limited to designated routes.
Non-WSA Lands with Wilderness Characteristics	Ray and Sharon Wells	Area with wilderness characteristics - White Cliffs area up to Glendale bench and down Four mile and Kanab Creek. 1. Sheep Springs road and spring area are machine built on top of the Whites T0410S -R0060W Sec. 25 2. Four mile Creek and Kanab Creek area were machine built which BLM has pictures of showing	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident

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		this and this was a main corridor from Glendale bench down to Kanab since the late 1800's, there are at least three signature rocks along the way with a couple of mileage markers still visible on rocks down Kanab Creek. also there are at least two lime kiln sites where lime was produced along Kanab Creek This was a main road and industrial area. How does it now qualify as a wilderness or even an area with wilderness qualities. Our ancestors would laugh at us! This area is riddled with roads and improvements (fences, springs, kilns, water tanks, etc. this area is ridden from top to bottom by trucks, jeeps, and OHV's and has been for decades. How can it qualify for wilderness characteristics?	of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	Russell Regentine	BLM is establishing new WSAs without the authority to do so.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.

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Non-WSA Lands with Wilderness Characteristics	Russell Regentine	Please disclose the difference in management prescriptions between "non-WSA lands with wilderness characteristics" and WSAs in the Final Environmental Impact Statement (FEIS).	The difference between non-WSA lands with wilderness characteristics (page 2-60) and WSAs is discussed in Chapter 2 of the Draft RMP/EIS. The Proposed RMP/Final EIS includes the management prescriptions for non-WSA lands with wilderness characteristics and the WSAs will continue to be managed according to the IMP.
Non-WSA Lands with Wilderness Characteristics	Russell Regentine	The 1999 inventory found lands that contain extensive OHV trails to have "wilderness characteristics." If the presence of OHV use did not impact the presence or absence of "wilderness characteristics," then by what rationale is the BLM proposing to significantly reduce OHV trails in these areas?	The Proposed RMP/Final EIS has been changed to include management of several non-WSA areas with wilderness characteristics. In the Proposed RMP/Final EIS, motorized travel in these areas is limited to designated routes.
Non-WSA Lands with Wilderness Characteristics	Seth Bowers U4WDA	3) Sheep Spring, four Mile Creek, and Kanab Creek are machine made roads that have been maintained since the late 1800's. This feat in its own negates these areas as wilderness.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	Motorized routes should not be designated within lands with identified wilderness characteristics.	Motorized routes in non-WSA lands with wilderness characteristics are not necessarily contrary to the management objectives. The impact analysis in Chapter 4 of the Draft RMP/EIS addresses impacts from motorized use on wilderness characteristics.
Non-WSA Lands with Wilderness Characteristics	SUWA	This management strategy should apply to both non-WSA lands identified as possessing wilderness characteristics by the BLM and non-WSA lands with wilderness characteristics included in wilderness proposals that have been introduced before Congress (i.e. the UWC ARWA proposal).	BLM is not required to protect non-WSA lands with wilderness characteristics or lands proposed by individuals, organizations, or areas included in legislation pending before Congress.
Non-WSA Lands with Wilderness Characteristics	SUWA	However, SUWA and others maintain that some wilderness quality lands have yet to be appropriately identified as possessing wilderness characteristics by the BLM.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	There also remain some areas that the BLM has yet to conduct an appropriate on-the- ground inventory, and has instead relied on aerial photos (which tend to exaggerate impacts because vegetation patterns from old impacts are far more visible from the air than on the ground), where as most of these impacts cannot be found on the ground by experienced field workers, and would certainly be unnoticeable to most visitors.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	Based on our review, SUWA contends that BLM has only performed a cursory assessment of these wilderness character units and a more complete and detailed evaluation and inventory of these units is warranted.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and

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			BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	These observation are based on on-the-ground inventories and other records. In sum, BLM must review the new information that SUWA has provided, and conduct on-the-ground wilderness inventories and reviews for these areas.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	The recent WCR arbitrarily excludes or fails to identify many natural and wilderness-character- quality BLM lands contiguous with the Dixie National Forest.	The process used to evaluate non-WSA lands with wilderness characteristics is described beginning on 3-66 of the Draft RMP/EIS. For lands to quality for consideration, they needed to be 5,000 acres in size or adjacent to areas administratively endorsed for wilderness by another Federal agency.
Non-WSA Lands with Wilderness Characteristics	SUWA	The Kanab and Utah BLM bases this arbitrary exclusion on the fact that the Forest Service has not yet "administratively endorsed" their portion of the roadless area for wilderness designation, therefore, the area would have to meet the size requirements as a "stand alone unit." This arbitrary practice requires that lands within the Forest Service must be currently endorsed for wilderness designation in order for the adjacent Kanab BLM lands to meet the wilderness character and size requirement.	The process used to evaluate non-WSA lands with wilderness characteristics is described beginning on 3-66 of the Draft RMP/EIS. For lands to quality for consideration, they needed to be 5,000 acres in size or adjacent to areas administratively endorsed for wilderness by another Federal agency.
Non-WSA Lands with Wilderness Characteristics	SUWA	Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service roadless area is not justified.	The process used to evaluate non-WSA lands with wilderness characteristics is described beginning on 3-66 of the Draft RMP/EIS. For lands to quality for consideration, they needed to be 5,000 acres in size or adjacent to areas administratively endorsed for wilderness by another Federal agency.
Non-WSA Lands with Wilderness Characteristics	SUWA	SUWA did supply the Kanab BLM with supplemental and new information for the Black Hills wilderness character unit previously, this information remains valid and BLM will need to correctly identify the area as retaining a wilderness character for all RMP planning purposes.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	BLM needs to correct this omission and correctly include natural lands and identify the true extent of naturalness.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with	SUWA	This (Heaps Canyon Wilderness Character Unit) has not been correctly identified	As part of BLM's wilderness characteristics inventory maintenance, BLM

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Wilderness Characteristics		by the Kanab BLM.	performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	BLM will need to correct this oversight and continue to expand its wilderness characteristic boundary north as shown by the supplemental map until it encounters a significant impact.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	The submission of information did not get incorporated within the planning process and was not assessed during the recent WCR. SUWA's wilderness character comments remain valid and highlight the full extent of wilderness characteristics not identified by the BLM. (Orderville Canyon Wilderness Character Unit)	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	None of this public information has yet been addressed or have these concerns and situation here been properly completed during its recent WCR. The comments remain valid and highlight where the full extent of wilderness characteristics are not identified by the BLM. (Orderville)	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	In spite of having this information, it appears the BLM has yet to address these concerns during the recent WCR or within the DRMP/EIS. The comments remain valid and continue to demonstrate the full extent of wilderness characteristics not identified by the BLM. (Parunuweap Canyon)	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	SUWA	The recent WCR is unjustified by the overly exclusion of the natural areas. (Parunuweap Canyon)	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.

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Non-WSA Lands with Wilderness Characteristics	SUWA	This area exemplifies the failure of the BLM to identify wilderness values and characteristics -- by an outright arbitrary separation of natural areas. (Vermillion Cliffs)	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	Tim Rasmussen	Sheep Springs Road, Four Mile Creek Road and Kanab Creek are all areas with existing roads. These roads are machine-made and should not be considered a wilderness area.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Non-WSA Lands with Wilderness Characteristics	Utah Archeological Research Institute	Therefore, there are no nonwilderness study lands with wilderness characteristics. They do not exist. The land was already studied and determined to be lacking in wilderness characteristics. Therefore, we ask that this section be deleted because the determination has already been made.	The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics." Finally, the Utah v. Norton Settlement Agreement does not affect

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			BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
Other	Darren Brinkerhoff	I have listed several reasons below why the BLMshould open up the land instead of close it down: 1) The Americans with disabilities Act (ADA) prohibits discrimination on the basis of disability by public entities. Subtitle A protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. It extends the prohibition of discrimination in federally assisted programs.	The ADA accessibility guidelines do not specify or quantify the type or degree of access that must be allowed on public lands. The ADA does not require that all public lands be vehicle accessible. In addition, designated recreational motorized routes are an administrative decision and not subject to ADA. However, the ADA accessibility guidelines will be use in construction of any Federal facilities on public lands.
Process and Procedures	Barry Clarkson Clarkson Draper & Beckstrom, LLC	My client has access to his property ONLY through the affected lands subject to the RMP. The applicable statute requires, "A list of individuals and groups known to be interested in or affected by a resource management plan shall be maintained by the District Manager and those on the list shall be notified of public participation activities" 43 CFR 1610.2(d). It is clear that my client has a direct interest in, and is affected by the proposed RMP and yet he has not been notified of any change.	The RMP process was initiated in April 2004 with the publishing of the Notice of Intent in the Federal Register. Several notices in local and statewide newspapers, radio advertisements, and flyers in local communities were used to announce the Kanab RMP process. In addition, two sets of public meetings to solicit public participation were held throughout local communities during the scoping period and after releasing the Draft RMP/EIS. A mailing list has been maintained throughout the RMP process. In addition, information about the Kanab RMP has been posted on the BLM website. More information about public outreach and participation was detailed in Chapter 5 of the Draft RMP/EIS and the Proposed RMP/Final EIS.
Process and Procedures	Barry Clarkson Clarkson Draper & Beckstrom, LLC	Issue No.1; Failure to Cooperate with Local Government Agencies. As you know the RMP was prepared as a requirement of NEPA as well as FLPMA. NEPA requires that local and state governments be consulted prior to taking action. In the present case no report or input was included or considered from either the involved counties or affected cities. Failure to include a report from a local government seems to violate NEPA and the cooperative principals upon which it is based. In the event there has been some report or suggestions from local governments or officials, said information should be included in the report and identified as such.	Both Kane and Garfield Counties and the State of Utah have been actively involved as cooperating agencies throughout the RMP process. Chapter 5 of the Draft RMP/EIS details their involvement.
Process and Procedures	Barry Clarkson Clarkson Draper & Beckstrom, LLC	In the present case no individual from the community has been included in any advisory committee thus depriving the decision making process of any local flavor or information which related to historical or socio-economic impacts to the proposed changes.	Both Kane and Garfield Counties and the State of Utah have been actively involved as cooperating agencies throughout the RMP process. Chapter 5 of the Draft RMP/EIS details their involvement. There is no requirement by law or regulation to include an advisory committee during the Kanab RMP process.
Process and Procedures	Barry Clarkson Clarkson Draper & Beckstrom, LLC	It is impossible to respond in sufficient detail on the proposed RMP given the time before public comment is closed.	The BLM provided the public with 90 days to review and comment on the Draft RMP/EIS, as required by the BLM land use planning regulations (43 CFR 1610.2(E)). The standard comment period for a Draft EIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(C). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the Draft RMP/EIS. The BLM made the Draft RMP/EIS

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			available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the Draft RMP/EIS and help focus review and comment efforts. Finally, the BLM held five open houses around the State to facilitate review of the Kanab Draft RMP/EIS.
Process and Procedures	Bryant Shakespear Garkane Energy	Cummulative Impact Analysis fails to include Garkane Energy proposed Tropic to Hatch 138 kV Transmission Line, application submitted to Kanab Field Office April of 2007. See pages 4-276, 4-285, 4-286.	Chapter 4 of the Proposed RMP/Final EIS has been revised to inlcude the Tropic to Hatch transmission line proposal.
Process and Procedures	Capital Trail Vehical Association	The project has a critical flaw which is the lack of a true "pro-recreation alternative that adequately addresses motorized recreation. All of the alternatives developed for consideration represent a significant reduction in routes available for motorized use. Not one Alternative even sustains the current opportunity.	BLM has provided a reasonable range of alternatives. As required by NEPA, the Draft RMP/EIS analyzes the current management (Alternative A). Each alternative, except for Alternative A, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (April 2004 through February 2005) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period.
Process and Procedures	Capital Trail Vehical Association	Therefore, it is incumbent upon the project team to formulate at least one alternative that maximizes motorized recreation, or at least does not reduce motorized recreational opportunities in the planning area. Therefore, we request that the project team formulate a wide range of alternatives including at least one Alternative that maximizes motorized recreational . opportunities in the project area and addresses the following:	Alternative A addresses sustaining the current management and opportunities throughout the decision area. This includes managing OHV use on more than 84% of the decision area as open to cross country OHV use with over 99% of the miles of inventoried routes open for OHV use.
Process and Procedures	Capital Trail Vehical Association	The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed. Ignoring cumulative effects allows the agency to continue to close motorized routes unchecked because the facts are not on the table. CEQ guidance on cumulative effects was developed to prevent just this sort of blatant misuse of NEPA.	Cumulative impacts to motorized recreation opportunities are identified the Draft RMP/EIS Section 4.6.3, Transportation heading. The cumulative impact analysis boundary for transportation has been modified to include the planning area and adjacent land management agencies (Zion National Park, Capital Reef National Park, Glen Canyon National Recreation Area, GSENM, Arizona Strip FO, Richfield FO, St. George FO, Cedar City FO, Dixie National Forest, regional State Trust Lands). In addition, the cumulative impact analysis has been adjusted to reflect the change in the boundary.
Process and Procedures	Capital Trail Vehical Association	The existing level of motorized access and recreation must not be dismissed without adequate consideration because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it.	Alternative A addresses sustaining the current management and opportunities throughout the decision area. This includes managing OHV use on more than 84% of the decision area as open to cross country OHV use with over 99% of the miles of inventoried routes open for OHV use.
Process and Procedures	Capital Trail Vehical Association	The difference between an RMP (general guidance) and the Travel Plan (implementation decision) is not clearly described in the DEIS. The FEIS should clearly articulate the difference.	The Proposed RMP/Final EIS was clarified in respect to the difference between implementation and land use plan level decisions.
Process and Procedures	Capital Trail Vehical Association	We are concerned that many of the restrictions in all ofthe Action Alternatives are simply not justified. The FEIS should clearly draw a connection between the facts on the ground and the decision made.	CEQ regulations implementing the National Environmental Policy Act (NEPA) require agencies evaluating effects on the human environment in an environmental impact statement (EIS) to identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 CFR 1502.22). As is typical in programmatic planning efforts, site-

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			specific data is used to the extent possible and may not be entirely available. Additional information on incomplete or unavailable information can be found in section 4.1.6 of the Draft RMP/EIS.
Process and Procedures	Capital Trail Vehical Association	The different management plans being developed by the BLM and Forest Service are using generated, estimated and inadequate data to forward an agenda ofeliminating access and motorized recreation from public lands. The economic impact ofthese closures will be devastating to small communities throughout the West. Models can be manipulated to predict any result Economic models such as IMPLAN should not be used when the input data is estimated and not factual or actual. Adequate effort must be exercised by the agencies to gather true on the ground data from businesses and individuals that use our public lands. We request that the economic analysis use actual local data to determine the true economic and social impact ofproposed motorized access and closures on the public.	CEQ regulations implementing the National Environmental Policy Act (NEPA) require agencies evaluating effects on the human environment in an environmental impact statement (EIS) to identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 CFR 1502.22). As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available. Additional information on incomplete or unavailable information can be found in section 4.1.6 of the Draft RMP/EIS.
Process and Procedures	Capital Trail Vehical Association	We request that these deficiencies be addressed by developing a starting benchmark alternative that identifies all of the existing roads and trails available to motorized recreationists including non-system routes and those falling under some undefined definition of "unusable" and those additional routes required to meet the needs of the public.	The best available route information was used as a starting point for identifying routes/trails. The route inventory process is specifically discussed in Appendix K. In addition, to the route inventory, routes identified during the public scoping and public comment period were integrated into the baseline route inventory and will be considered in preparing the Proposed RMP/Final EIS.
Process and Procedures	Capital Trail Vehical Association	We request that the environmental document adequately addresses the social economic, and environmental justice issues associated with multiple-use access and motorized recreation. We request that the environmental document include a travel management alternative for the project area that adequately responds to these issues and the needs for multiple-use access and recreation.	The social, economic, and environmental justice issues are addressed in section 4.5.1 of the Draft RMP/EIS.
Process and Procedures	Carl Albrecht Garkane Energy	3. Cumulative Impact Analysis fails to include Garkane Energy's proposed Tropic to Hatch 138 kV Transmission Line Application submitted to Kanab Field Office in April of 2007. See Pages 4-276,4-285, 4-286.	Chapter 4 of the Proposed RMP/Final EIS has been revised to inlcude the Tropic to Hatch transmission line proposal.
Process and Procedures	Colorado Plateau Archaeological Alliance	We emphasize that the BLM cannot properly manage cultural resources it does not know exist, and hence the absence of a statistically valid sample militates against adequate consideration of potential impacts to unknown cultural resources.	In preparing the PRMP/DEIS, the BLM used the best available information to form the basis for the cultural resources analysis. This baseline data is a result of Section 106 and 110 inventories of the area and represents the volume of information available. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation.
Process and Procedures	Colorado Plateau Archaeological Alliance	The primary consideration in this discussion is that OHVs allow greater public access to archaeological sites, and that this access facilitates adverse effects. This is casually acknowledged in the Draft EIS with the statement that "As access to an area increases, incidental damage of cultural resources adjacent to the access routes would increase. Impacts from incidental damage would be reduced as distance from the access route increases" (DEIS 4-96). As discussed above, damage to or destruction of archaeological sites is most prevalent along existing routes, usually within 200 meters of an existing route (cf. Spangler, Arnold and	As noted in the Draft RMP/EIS page 4-3, one of the over-arching assumptions for the impact analysis is that "public land users would comply with the decisions and allocations contained in the alternatives." The Draft RMP/EIS proposes a variety of actions and analyses the impacts of those actions. There are countless ways that individuals can inadvertently or wantonly not comply with the Draft RMP/EIS prescriptions, none of which are actions proposed in any of the chapter 2 prescriptions. Impacts from illegal behavior are therefore an issue of enforcing the prescriptions contained in the various alternatives. Allocation of law enforcement

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		Boomgarden 2006). Hence, the limitation of OHV travel to existing or designated routes may not significantly reduce impacts to cultural resources along those routes. These data stand in decided contrast to statements in the Draft EIS, Alternatives B and D, that the designation of routes "would result in minimal additional impacts on cultural resources due to existing use on these routes. Because the designated routes currently exist, the damage to them would also be minimal" (DEIS 2-119).	presence is an Administrative Action by the BLM and does not require a specific planning decision to implement.
Process and Procedures	ECOS Consulting	This Kanab DRMP/DEIS does not adequately address direct, indirect, and cumulative impacts. The purpose of the National Environmental Policy Act (NEPA) is to provide line officers and the public with full disclosure of the environmental consequences of taking action so they can make "informed" decisions. The Council on Environmental Quality regulations require that impact analyses include discussions of adverse and beneficial effects, short- and long-term effects, direct and indirect effects, and cumulative effects. The characterization of impacts must not only be simply an accounting of acres affected, as is the case throughout this Kanab DRMP/DEIS, but it must include descriptions of potential beneficial and adverse impacts, of impact duration, intensity or magnitude, and context (site specific, local, regional, and national effects, etc.), and there must be an analysis of direct, indirect, and cumulative impacts. In this Kanab DRMP/DEIS, many of the conclusions regarding potential impacts were presented without supporting scientific analysis, agency monitoring data or rationale, and, as such, appear arbitrary and unfounded.	A systematic interdisciplinary approach was used to provide accurate, objective, and scientifically sound environmental analysis on the environmental consequences associated with the management actions or prescriptions under each alternative. The analysis discloses the direct, indirect, and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives. Furthermore, page 4-4 of the Draft RMP/EIS explains: "Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA) require that agencies evaluating reasonably foreseeable significant adverse effects on the human environment in an EIS identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 Code of Federal Regulations [CFR] 1502.22). As is typical in programmatic planning efforts, site-specific data are used to the extent possible but may not be entirely available. The best available information that is pertinent to management actions was used in developing this Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS)."
Process and Procedures	ECOS Consulting	Many areas within the Kanab Decision Areas are adversely impacted, and have been for many years by activities allowed by the BLM. These impacts must be analyzed in greater detail, and BLM must provide supporting analysis and the rationale for the agency's subsequent conclusions. This is particularly evident in the sections on livestock grazing, mineral resources, and recreational and travel decisions. BLM fails to provide quantitative and/or qualitative analyses, and it fails to adequately consider the direct, indirect, and cumulative effects of the proposed alternatives.	The current condition of the planning area is described in Chapter 3, Affected Environment. This describes the current situation which is the results of BLM and non-BLM actions on the planning area over time. Chapter 4 of the Draft RMP/EIS includes the impact analysis for the No Action Alternative. Some impacts cannot be quantified given the proposed management actions. Where this gap occurs, impacts are projected in qualitative terms. In many situations, subsequent project-level analysis will provide the opportunity to collect and examine site-specific inventory data required to determine appropriate application of RMP-level guidance. In addition, ongoing inventory efforts by BLM and other agencies within the planning area continue to update and refine information that will be used to implement this RMP.
Process and Procedures	ECOS Consulting	BLM's Kanab DRMP/DEIS fails to include a reasonable range of Alternatives. Specifically, it contains no alternative that would adequately protect the scarce riparian resources of the Kanab BLM Decision Area from OHV use, livestock grazing, mineral development and associated damages from these activities.	BLM has provided a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period on the RMP DEIS.

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Process and Procedures	ECOS Consulting	Reasonable alternatives that limit the number and extent of OHV routes must be presented.	BLM has provided a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period on the RMP DEIS.
Process and Procedures	ECOS Consulting	What are the direct, indirect, and cumulative impacts of these OHV routes within specific riparian areas? The Kanab DRMP/EIS mentions some direct impacts but fails to disclose the long-term indirect and cumulative impacts.	The impact analysis used the best available information and methodology to determine the impacts to riparian areas associated with the Draft RMP/EIS. As stated in Appendix K, impacts to riparian areas were considered in identifying routes and will continue to be a criteria in identifying routes. In addition, monitoring riparian conditions, as needed, for surface uses that could affect riparian area health and functionality would ensure appropriate actions could be taken to protect these areas before functioning condition becomes impaired.
Process and Procedures	ECOS Consulting	It is highly recommended that the BLM perform these types of analyses before committing to 10-20 more years of management without adequate background baseline, trend, and potential habitat extent information.	CEQ regulations implementing the National Environmental Policy Act (NEPA) require agencies evaluating effects on the human environment in an environmental impact statement (EIS) to identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 CFR 1502.22). As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available. Additional information on incomplete or unavailable information can be found in section 4.1.6 of the Draft RMP/EIS.
Process and Procedures	ECOS Consulting	This Kanab DRMP does not present an adequate range of Alternatives for the proposed number and extent of open OHV routes in the Travel Plan.	BLM has provided a reasonable range of alternatives. As required by NEPA, the Draft RMP/EIS analyzes the current management (Alternative A). Each alternative, except for Alternative A, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (April 2004 through February 2005) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period.
Process and Procedures	ECOS Consulting	BLM does not provide an adequate range of alternatives for the number and extent of OHV routes allowed. BLM ignores the seriousness of the impacts.	BLM has provided a reasonable range of alternatives. Each alternative represents an alternative means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period on the RMP DEIS. Chapter 4 discloses impacts to resources and resource uses from OHV use and route identification.
Process and Procedures	ECOS Consulting	It is recommended that the BLM analyze the direct, indirect, and cumulative effects of roads, throughout the 524,000 acres of the Kanab Decision Area that will contribute to the fragmentation of wildlife habitat.	Impacts to wildlife habitat and the fragmentation of habitat are analyzed in the Impacts to Fish and Wildlife Habitat and the Impacts to Special Status Species sections of Chapter 4 of the Draft RMP/EIS.
Process and	ECOS Consulting	It is recommended that the BLM act wisely and in the spirit of its mandates and	The resources and uses that the commentor raises were considered in identifying

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Procedures		commitments to maintain healthy and sustainable ecosystems, by eliminating and restoring many of these OHV routes. If many of these roads remain open for the next 10-20 years, the future of much wildlife habitat will continue to be at risk due to many of the adverse impacts listed above.	routes. The process used to designate routes is explained in Appendix K.
Process and Procedures	ECOS Consulting	The DRMP's range of alternatives for livestock grazing is not adequate and must be expanded to include alternatives that allow little (15-25%) or no grazing (0%) or some grazing(50%), or a lot of grazing (>90%).	The BLM did consider an alternative that closed the decision area to livestock grazing, but did not analyze it in detail (see Draft RMP/EIS chapter 2 section 2.3.2). NEPA does not require the BLM to consider an arbitrary range of analysis simply for the sake of analysis. Rather, the CEQ regulations (1502.14) requires the BLM to develop a reasonable range of alternatives, including the no action alternative, the preferred alternative, and other reasonable alternatives to address the issues raised during scoping. The BLM has provided a reasonable range of alternatives to address the issues raised related to livestock grazing . As required by NEPA, the Draft RMP/EIS analyzes the current management (Alternative A). Each alternative, except for Alternative A, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (April 2004 through February 2005) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period.
Process and Procedures	ECOS Consulting	Many of the impacts described in this Kanab DRMP/DEIS have been monitored by the BLM, but the BLM has failed to provide analyses, trends, and summary data for the information collected in the field.	Chapter 3 of the Draft RMP/EIS provides the baseline conditions and trends of the decision area. This chapter is a summary of the data that has been collected by BLM. Additional information can be found in the administrative record, Analysis of the Management Situation, and Kanab Field Office files. There is no legal or regulatory requirement to provide monitoring/ evaluation/ feedback reports in the Draft RMP/EIS.
Process and Procedures	ECOS Consulting	Page 4-24, 3r d Paragraph: Mitigation is mentioned here but details are not forthcoming. According to NEPA, planned mitigation must be described in detail. What mitigation protocols will be used to restore biological soil crusts? How long will it take for the biological soil crusts to become ecologically effectual? The mitigation described briefly in this DRMP/EIS cannot restore biological soil crusts within 5 years, thus the direct impacts are long-term. The direct loss of biological soil crusts on 8,426 acres is unacceptable when considering the indirect and cumulative effects, which can spread to a much larger adjacent area. What are the projected indirect and cumulative effects? The BLM makes no effort to analyze these.	Individual mitigation measures are developed to address site-specific conditions including, soil types, and vegetation types that vary across the decision area. Additionally, mitigation measures are developed based on the proposed implementation action. The mitigation measures would be applied to site-specific actions after NEPA analysis.
Process and Procedures	ECOS Consulting	In this Draft RMP/EIS, where is the analysis of cumulative effects regarding the past, present, and reasonably foreseeable future actions of the impacts discussed? There is no mention of the past impacts of livestock grazing, mineral development, and OHV use, and how these have adversely affected the biological soil crusts and vegetation today, and in the future.	The Draft RMP/EIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the Draft RMP/EIS chapter 3 (e.g., soil resources, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the Draft RMP/EIS. Anticipated impacts from present actions and proposed future actions are

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			reflected in Chapter 4 of the Draft RMP/EIS. Anticipated impacts from actions associated with the alternatives are in the Draft RMP/EIS chapter 4 section 4.1 through 4-5. Anticipated impacts from actions outside the decision area are contained in Draft RMP/EIS chapter 4 section 4.6.
Process and Procedures	ECOS Consulting	There is also no mention of the context, intensity, and duration of an impact.	The impact analysis in Chapter 4 of the Draft RMP/EIS addresses the context, intensity, and duration of impacts as described in section 4.1.2.
Process and Procedures	ECOS Consulting	In relation to Appendix A on page AA-1 – Although BMP's have been in place for many years, the BLM doesn't ever mention a monitoring program, or an evaluation of the success of one BMP application, nor any feedback. Are there any monitoring/ evaluation/ feedback reports on any of the projects where BMP's were used? If there are, these must be summarized in this document so that these BMP's can be judged effective or not, so that future management planning can be successful.	There is no legal or regulatory requirement to provide monitoring/ evaluation/ feedback reports in the Draft RMP/EIS. Individual BMPs are developed to address site-specific conditions, soil types, and vegetation types based on agency and industry experience and scientific advances over time. Specific BMPs are adjusted would be applied to site-specific actions after NEPA analysis.
Process and Procedures	ECOS Consulting	National Environmental Policy Act (NEPA) court precedence states that rather than just listing mitigation, the Environmental Impact Statement (EIS) must analyze mitigation in detail and explain the effectiveness of the measures in terms of the resulting impacts (Northwest Indian Cemetery Protective Association v. Peterson, 795 F. 2d 288 (9th Cir. 1986)). The BLM has not done this in this DRMP/EIS for many of the issues for which it recommends mitigation.	Individual mitigation measures are developed to address site-specific conditions including, soil types, and vegetation types that vary across the decision area. Additionally, mitigation measures are developed based on the proposed implementation action. The mitigation measures would be applied to site-specific actions after NEPA analysis.
Process and Procedures	ECOS Consulting	National Environmental Policy Act (NEPA) court precedence states that rather than just listing mitigation, the Environmental Impact Statement (EIS) must analyze mitigation in detail and explain the effectiveness of the measures in terms of the resulting impacts (Northwest Indian Cemetery Protective Association v. Peterson, 795 F. 2d 288 (9th Cir. 1986)). This discussion of acres impacted must be more thorough and not only analyze the direct impacts, but also the indirect and cumulative impacts.	Individual mitigation measures are developed to address site-specific conditions including, soil types, and vegetation types that vary across the decision area. Additionally, mitigation measures are developed based on the proposed implementation action. The mitigation measures would be applied to site-specific actions after NEPA analysis.
Process and Procedures	ECOS Consulting	In this DRMP/EIS, where is the analysis of cumulative effects regarding the past, present, and reasonably foreseeable future actions of the impacts discussed? There is no mention of the past impacts of livestock grazing, mineral development, and OHV routes and use, and how these have adversely affected the biological soil crusts, vegetation, and water quality and quantity today, and in the future.	The Draft RMP/EIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the Draft RMP/EIS chapter 3 (e.g., soil resources, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the Draft RMP/EIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the Draft RMP/EIS. Anticipated impacts from actions associated with the alternatives are in the Draft RMP/EIS chapter 4 section 4.1 through 4-5. Anticipated impacts from actions outside the decision area are contained in Draft RMP/EIS chapter 4 section 4.6.
Process and Procedures	ECOS Consulting	These indirect and cumulative effects must be analyzed or estimated by the BLM in this document. Simply stating, as the BLM does numerous times in this DRMP/DEIS, that all actual and potential problems will be mitigated is not enough in a NEPA-based EIS.	Individual mitigation measures are developed to address site-specific conditions including, soil types, and vegetation types that vary across the decision area. Additionally, mitigation measures are developed based on the proposed implementation action. The mitigation measures would be applied to site-specific

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			actions after NEPA analysis.
Process and Procedures	ECOS Consulting	Page 4-41, 5th Paragraph: The magnitude of impacts would indeed decrease when compared to alternative A, but is that the standard that all impact analysis should be compared to? I don't think that is the intention of NEPA. Instead of comparing alternative B impacts to the worst case management scenario (alternative A), the BLM must concentrate on and describe the actual intensity and duration of direct, indirect, and cumulative impacts.	In the document prepared by CEQ "NEPA's Forty Most Asked Questions" (accessed on June 5, 2007 at http://ceq.eh.doe.gov/nepa/regs/40/40p3.htm), the CEQ clarified the definition and use of the "no action" alternative as follows: "…projected impacts of alternative management schemes would be compared in the EIS to those impacts projected for the existing plan." Therefore, the Draft RMP/EIS chapter 4 compared the impacts from Alternatives B-D to those impacts described in Alternative A.
Process and Procedures	ECOS Consulting	The BLM's conclusions of cumulative effects in this document were presented without supporting scientific analysis or rationale, and, as such, appear arbitrary and unfounded.	A systematic interdisciplinary approach was used to provide accurate, objective, and scientifically sound environmental analysis on the environmental consequences associated with the management actions or prescriptions under each alternative. The analysis discloses the direct, indirect, and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives.
Process and Procedures	ECOS Consulting	In planning these activities the BLM must show that it is taking every precaution to protect biological soil crusts and minimize surface disturbance. Has the BLM done this? If so, where is the documentation and what are the measures?	Individual mitigation measures are developed to address site-specific conditions including, soil types, and vegetation types that vary across the decision area. Additionally, mitigation measures are developed based on the proposed implementation action. The mitigation measures would be applied to site-specific actions after NEPA analysis.
Process and Procedures	ECOS Consulting	The BLM lists many direct and indirect impacts but fails to adequately discuss intensity and duration. The biggest short-coming of this analysis is to call all of these impacts "short-term" when in fact they are long-term (last more than 5 years).	The impact analysis in Chapter 4 of the Draft RMP/EIS addresses the context, intensity, and duration of impacts as described in section 4.1.2.
Process and Procedures	ECOS Consulting	In this Kanab DRMP/DEIS, by not including a reasonable range of alternatives, and not dealing directly with the impacts of livestock grazing, OHV routes, and mineral development, the BLM is skirting the NEPA requirements that compel the agencies to concentrate on the significant issues that will seriously effect the protection, restoration, and enhancement of the human environment. Only by considering a full range of alternatives and the full direct, indirect, and cumulative impacts of these activities can the BLM make sound management decisions.	BLM has provided a reasonable range of alternatives. As required by NEPA, the Draft RMP/EIS analyzes the current management (Alternative A). Each alternative, except for Alternative A, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (April 2004 through February 2005) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period.
Process and Procedures	ECOS Consulting	For cumulative impacts the following questions must be answered according to the Judicial Review Standard: The "Fritiofson v. Alexander" Test (Fritiofson v. Alexander, 772 F.2d 1225 (5th Cir. 1985).	The case cited is not authority in the 10th Circuit, nor is it considered reliable authority for the principle for which the commentor cites. BLM acknowledges that as part of its cumulative impacts analysis, impacts beyond the planning area must be included. BLM defines the cumulative impact anlaysis area in the Cumulative Impact Analysis section in Chapter 4. The past, present and reasonably foreseeable actions are also discussed in the Cumulative Impact Analysis section in Chapter 4.
Process and Procedures	Five County Association of Governments	The final RMP must include a description of the process employed to recognize RS2477 assertions that have gained judicial authorization, and provide county governments with a procedure to submit such assertions.	The adjudication or non-binding determination process for RS 2477 assertions is outside the scope of the Kanab RMP. When in the future routes are adjudicated or recognized by non-binding determination, the routes in the transportation system would be revised according to the process described in Appendix K of the Draft

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			RMP/EIS.
Process and Procedures	Laura Welp	I think it would be judicious ofyou to increase the time available for public comment.	The BLM provided the public with 90 days to review and comment on the Draft RMP/EIS, as required by the BLM land use planning regulations (43 CFR 1610.2(E)). The standard comment period for a Draft EIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(C). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the Draft RMP/EIS. The BLM made the Draft RMP/EIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the Draft RMP/EIS and help focus review and comment efforts. Finally, the BLM held five open houses around the State to facilitate review of the Kanab Draft RMP/EIS.
Process and Procedures	National Parks Conservation Association	BLM has erred in excluding the National Park Service as cooperating agency. The have ignored the directive outline in January 30, 2002 Memorandum from James Connaughton, Council on Environmental Quality (CEQ) Chair. The exclusion of the NPS from cooperating agency status has limited the input from this most qualified agency on the import of effects on Bryce Canyon, Zion and Capitol Reef National Parks and on the preferred approach to managing these effects. BLM must invite the National Park Service to act as a cooperating agency for the remainder of the RMP revision, including assessment of comments and recommendations for revising the Preferred Alternative. In addition, the NPS should be given the opportunity to review the information previously provided to the other cooperating agencies, and then provide input on the analysis of effects and management recommendations pertaining to Bryce Canyon, Zion and Capitol Reef National Parks.	While the National Park Service could have been included as a cooperating agency, none of the three Park Service units (Zion National Park, Bryce Canyon National Park, and Glen Canyon National Recreation Area) directly adjacent to the planning area expressed interest in being cooperating agencies during the scoping period or in their comments on the Draft RMP/EIS. In lieu of official cooperating agency status, the BLM has coordinated closely with the parks in identifying their concerns and providing opportunities for direct coordination during key points of the planning process. These coordination actions are detailed in the Draft RMP/EIS chapter 5, page 5-5.
Process and Procedures	Randy Parker Utah Farm Bureau Federation	Farm Bureau is opposed to the BLM's use of the RMP process to retain federal ownership of the federal lands in violation of the equal footing doctrine of the U.S. Constitution and other pertinent federal law, including FLPMA.	Section 102(a)(1) of FLPMA states: "Congress declares that it is the policy of the United States that the public lands be retained in Federal ownership, unless as a result of the land use planning procedure provided for in this Act, it is determined that disposal of a particular parcel will serve the national interest." The land tenure adjustment critieria is listed on pages 2-90 and 2-91 of the Draft RMP/EIS. Public lands must meet one or more of the criteria to be considered for any form of land tenure adjustment. The RMP process is mandated by Federal law, specifically FLPMA. In addition, Appendix E of the Draft RMP/EIS includes a list of lands designation for potential disposal via FLPMA Section 203 sale.
Process and Procedures	Richard Csenge	Designating 1385 miles of totally unplanned routes, as does Alternative B is unnecessary, absurdly redundant, and is neither manageable nor enforceable. Even Alternative C, with 884 miles of designated routes is far too many. Such designations do not constitute a well-designed transportation plan. No proper study or inventory process could yield such proposals. BLM KFO has not completed current assessments of existing OHV damage, nor impact studies	BLM used the process described in Appendix K of the Draft RMP/EIS to identify routes to be included in the transportation system. BLM has provided a reasonable range of alternatives for the transportation plan. Each alternative represents an alternative means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period.

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		projecting future damage. NEPA rules have not been followed in the creation of the Hog Canyon Trail System.	The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period on the RMP DEIS. Chapter 4 discloses impacts to resources and resource uses from OHV use and route identification.
Process and Procedures	Susan Hand	My first suggestion is that the BLM extend the public comment period. The placement over the holidays, coupled with simultaneous comment periods for five other Utah RMP's, almost seems designed to limit public understanding and participation, which is counter to the intended purpose. Other unforeseen distractions have further divided the public's attention. We may well live under the final plan for decades to come, so it is critical that it be developed carefully.	The BLM provided the public with 90 days to review and comment on the Draft RMP/EIS, as required by the BLM land use planning regulations (43 CFR 1610.2(E)). The standard comment period for a Draft EIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(C). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the Draft RMP/EIS. The BLM made the Draft RMP/EIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the Draft RMP/EIS and help focus review and comment efforts. Finally, the BLM held five open houses around the State to facilitate review of the Kanab Draft RMP/EIS.
Process and Procedures	SUWA	A. The Public Comment Period is Far Too Short to Allow for a Fully Informed Response to the Draft Plan PR.P	The BLM provided the public with 90 days to review and comment on the Draft RMP/EIS, as required by the BLM land use planning regulations (43 CFR 1610.2(E)). The standard comment period for a Draft EIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(C). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the Draft RMP/EIS. The BLM made the Draft RMP/EIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the Draft RMP/EIS and help focus review and comment efforts. Finally, the BLM held five open houses around the State to facilitate review of the Kanab Draft RMP/EIS.
Process and Procedures	SUWA	B. The Kanab DRMP/EIS fails to acknowledge the public will regarding land management preferences.	The BLM has involved the public throughout the RMP process beginning with public scoping meetings. The issues raised during the scoping period were incorporated into the Kanab Draft RMP/EIS. A range of management actions was developed to address the issues identified by the public. All the action alternatives significantly reduce areas open to cross country use and reduce the number and mileage of routes open to motorized travel.
Process and Procedures	SUWA	The proposed designation of only 3,800 acres of ACEC when 60,600 acres have been found eligible falls far short of FLPMA's mandate that BLM give "priority" to this resource.	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD).

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			The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations

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			to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.
Process and Procedures	SUWA	Certain elements of the RMP, most strikingly the travel plan and OHV designations, fail the UUD standard. By several measures, the proposed travel plan and OHV designations will harm natural resources by increasing cumulative dust and decreasing air quality; unnecessarily fragmenting wildlife habitat; causing unnecessary damage to riparian areas, floodplains and cultural resources; reducing naturalness in areas with identified wilderness characteristics; and, impairing Wilderness Study Areas.	The BLM analyzed the impacts of travel management as outlined and described in Chapter 4 of the DRMP/DEIS. Congress recognized, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. Also, as a matter of clarification, the unnecessary or undue degradation (UUD) is a management standard that the BLM applies to third party public land users.
Process and Procedures	SUWA	In the context of this RMP, the decisions made with regard to travel planning must more fully analyze all effects of travel planning and other planning so that all cumulative and site specific environmental and social impacts are adequately analyzed.	The commentor does not provide examples or alternative methods to revise the cumulative impact analysis. The level of cumulative impact analysis for the Kanab RMP is sufficient for an RMP-level EIS. The cumulative impact analysis is included in Section 4.6 of the Draft RMP/EIS.
Process and Procedures	SUWA	NEPA requires BLM to "rigorously explore and objectively evaluate" a range of alternatives to proposed federal actions, and the lack of an alternative that adequately protects natural and cultural resources is a fatal flaw to this plan. See 40 C.F.R. §§ 1502.14(a) and 1508.25(c).	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, four alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2-4 in the Kanab Draft RMP/EIS provides in comparative form the management actions associated with each alternative.
Process and Procedures	SUWA	For this Draft RMP, the consideration of more environmentally protective alternatives consistent with FLPMA's requirement that BLM "minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) ofthe public lands involved," is lacking given the dearth of analysis, the limited range of alternatives, and the omission ofthe Vermilion Cliffs Heritage Proposal as an alternative. 43 U.S.c. §1732(d)(2)(a).	The Vermilion Cliffs Heritage Proposal in its entirety was considered in the Draft RMP/EIS on pg. 2-32 as an alternative considered but eliminated from detailed analysis. Components of this plan were carried forward for analysis in all the action alternatives. Alternative C was developed as an envronmentally protective alternative.
Process and Procedures	SUWA	The Travel Plan included in this EIS is a key example of the aforementioned citations, with each alternative posing significant resource harms and no alternative that mitigates those harms (i.e. no alternative not designating routes within WSAs or WC areas).	Alternative C emphasizes the protection/preservation of natural resources. Alternative C of the Draft RMP/EIS closes WSAs and WC areas to OHV use.
Process and Procedures	SUWA	This type of analysis is wholly lacking with regard to travel planning, as well as many other aspects of the Kanab Draft RMP.	The comment is general and lacking specific examples of how the management alternatives and analysis are inadequate.
Process and Procedures	SUWA	BLM's cursory dismissal ofthe Vermilion Cliffs Heritage Proposal is a clear indication of the BLM's refusal to entertain a responsible "opposing view" in the planning process. SUWA's comments about BLM's capricious dismissal ofthe Vermilion Cliffs Heritage Proposal are included in these comments immediately below.	In the Kanab Draft RMP/EIS, Alternative C emphasizes the protection and preservation of natural resources and minimizes human activities, over commodity production and extraction and motorized recreation access. Alternative C best protects and preserves historic, cultural and natural resources. The BLM did give full consideration to the Vermilion Cliffs Heritage Proposal, including the concept that a desirable BLM Travel Plan contains an equitable allocation between non-

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			motorized and motorized recreation. Although for the reasons outlined in the Draft RMP/EIS on pg. 2-32 the Vermilion Cliffs Heritage Proposal was eliminated from detailed analysis, components of the proposal were carried forward for consideration and analysis in all the action alternatives.
Process and Procedures	SUWA	Our review of the draft RMP and EIS show that much more work must be done on these documents before they can be formalized. We found significant deficiencies in both the analysis of the current condition and the analysis ofthe impacts ofthe proposed alternatives.	The comment is general and lacking specific examples of how the management alternatives and analysis are inadequate.
Process and Procedures	SUWA	One of the most obvious and consequential flaws in the document is its failure to assess the ongoing impact of existing ORV use in the Kanab Field Office.	The impacts of travel on natural resources are analyzed in Chapter 4 of the Draft RMP/EIS, including the No Action alternative. The Transportation Section in Chapter 3 of the Draft RMP/EIS presents the baseline (current situation) for analysis in Chapter 4. It discusses the ongoing and baseline issues surrounding cross-country travel that is currently permitted by the existing land use plan for the Field Office. The planning area was inventoried as having 1,479 miles of non-paved routes. This number represents the baseline for analysis, however, it is also recognized that cross-country travel is currently allowed in the majority of the Field Office. The impacts associated with cross-country OHV use are described in Chapter 4 under the No Action Alternative. The action alternatives limit travel to designated routes. The routes that are already in use are considered part of the baseline, and therefore, it is not reasonable to consider the impacts to vegetation from these already disturbed linear surfaces.
Process and Procedures	SUWA	The DRMP must include BLMs, USFWS's and the Utah Dept. of Natural Resources' monitoring data, trend analysis, and any other available documentation of he Welsh's milkweed and the impacts of ORV use on this federally listed species. This information is necessary in order for the decision maker and the public to ascertain if the requirements of the Endangered Species Act are being met if ORV use is allowed in Welsh's milkweed habitat.	The data the commentor references was used in describing the current conditions of the species (Draft RMP/EIS Chapter 3) and in the impact analysis (Chapter 4).
Process and Procedures	SUWA	Because hard information on visitation was missing from the AMS and Affected Environment section of the Draft RMP, the BLM has created a potentially false impression that the Kanab Field Office is a location in which ORV use is more popular than every other recreation pursuit, which contradicts information gathered by BLM, itself - for the Moquith sand dunes where motorized use appears to be heaviest - that indicates that over 90% of the visitors to the sand dunes are non-motorized users.	The Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use.

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			The data reference by the commentor regarding 90% of the visitors to the sand dunes are non-motorized users is unsupported and does not reflect visitation data collected by BLM or the State Park. The data collected by the State Park indicates that 83% of the visitors to the sand dunes are non-motorized users. This data does not directly correlate with visitation for the BLM portion of the sand dunes due to the fact that visitors seeking a non-motorized experience will generally go to the State Park which has facilities to support this type of use. The use on the BLM portion of the sand dunes is mostly motorized. These use trends are based on observation and professional judgement by BLM staff.
Process and Procedures	SUWA	1. We reiterate that the BLM's failure to analyze and present information about the impacts of existing ORV use violates its NEPA duties.	The impacts of travel on natural resources are analyzed in Chapter 4 of the Draft RMP/EIS, including the No Action alternative. The Transportation Section in Chapter 3 of the Draft RMP/EIS presents the baseline (current situation) for analysis in Chapter 4. It discusses the ongoing and baseline issues surrounding cross-country travel that is currently permitted by the existing land use plan for the Field Office. The planning area was inventoried as having 1,479 miles of non-paved routes. This number represents the baseline for analysis, however, it is also recognized that cross-country travel is currently allowed in the majority of the Field Office. The impacts associated with cross-country OHV use are described in Chapter 4 under the No Action Alternative. The action alternatives limit travel to designated routes. The routes that are already in use are considered part of the baseline, and therefore, it is not reasonable to consider the impacts to vegetation from these already disturbed linear surfaces.
Process and Procedures	SUWA	2. ORV impacts to vegetation are largely ignored. For example, Chapter 4's discussion of this impact is limited to two paragraphs, neither of which is quantitative in nature and which do not assess the probability of ORVs introducing and facilitating the spread of non-native species. However, the plan admits on p. 4-41 that "areas open to cross-country OHV use (1,100 acres)" would be more likely to experience surface disturbance, but fails to mention that this disturbance takes place in a WSA.	Impacts to vegetation resources from OHV use are addressed in Section 4.2.4 of the Draft RMP/EIS. The commentor does not include specific data or analysis to refute the existing analysis. The document specifically notes that OHV use can directly contribute to introducing and facilitating the spread of noxious or invasive species. The IMP allows for open OHV use in sand dunes and continued use of inventoried ways in WSAs during the WSA phase.
Process and Procedures	SUWA	3. Chapter 4's discussion of soils at 4-16 to 4-24 lacks well-considered, informed decisions about broad-scale uses with long-term impacts - such as the designation of thousands of miles of ORV routes.	The Transportation Section in Chapter 3 of the Draft RMP/EIS presents the baseline (current situation). It discusses the ongoing and baseline issues surrounding OHV on existing routes that is currently permitted by the existing land use plan for the Field Office. The planning area was inventoried as having 1,479 miles of non-paved routes. The impacts associated with OHV use on existing routes are described in Chapter 4 under the No Action Alternative. The routes that are already in use are considered part of the baseline, and therefore, it is not reasonable to consider the impacts to soil resources from these already disturbed linear surfaces. As stated on page 4-20 of the Draft RMP/EIS, "OHV use would be limited to 1,387 miles of designated routes on 524,000 acres indirectly protecting nearby soils

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			from increased erosion by focusing impacts on compacted surfaces that have already been impacted."
Process and Procedures	SUWA	The DRMP/EIS never considers or analyzes whether current or proposed ORV use levels are sustainable over the long term.	The current use and projected trend of OHV recreation was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.
Process and Procedures	SUWA	However, the BLM never quantifies this assertion with analysis of how close many of the proposed routes are to known sites. Also, there is no analysis of the likelihood that route designation will harm unknown sites.	Cultural resources were considered in identifying routes. In addition, Section 106 consultation is being conducted. As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the affect and nature of the proposed OHV activity and the expected density and nature of historic properties. The process used to designate routes is explained in Appendix K.
Process and Procedures	SUWA	Yet nowhere in the document is the estimated amount of soil lost to ORV use quantified. This information gap should be filled by inclusion of the best available data and methodology.	As described in Chapter 3, the best available soil data was used in drafting the Kanab RMP. In addition, the commentor does not provide alternative data or information to incorporate in the analysis.
Process and Procedures	SUWA	However wouldn't decisions to limit grazing based on riparian area destruction also impact ORV decisions? As would decisions to protect areas based on visual resources, or wildlife? Please provide an explanation for this approach.	Limiting a resource use from a particular area due to potential impacts does not necessarily require limiting another similar use. Management decisions that limit livestock grazing do not limit OHV use. As described in Appendix K of the Draft RMP/EIS, riparian areas, wildlife habitats, and other management objectives (VRM) were considered in identifing routes to include in the transportation system.
Process and Procedures	SUWA	The DEIS generally provides little or no discussion of cumulative impacts or the effects connected activities have on various resources.	The commentor does not provide examples or alternative methods to revise the cumulative impact analysis. The level of cumulative impact analysis for the Kanab RMP is sufficient for an RMP-level EIS. The cumulative impact analysis is included in Section 4.6 of the Draft RMP/EIS.
Process and Procedures	SUWA	For example, the plan provides for high levels of both grazing and ORV use in canyon bottoms where riparian areas and cultural sites are also prevalent. Yet the plan does little more than acknowledge the combined effects of these two intensive uses, both of which are associated with long-term impacts such as decreased water quality and quantity, native plant loss, soil erosion and diminished enjoyment by non-motorized recreationists.	The levels of grazing and OHV use in canyon bottoms were not raised as issues during the scoping period. In addition, current monitoring does not indicate livestock grazing or OHV use in canyon bottoms is causing unacceptable impacts. Livestock grazing and OHV management decisions address the protection of riparian areas. Monitoring riparian conditions, as needed, for uses that could affect riparian area health and functionality would ensure appropriate actions could be taken to protect these areas before functioning condition becomes impaired.
Process and Procedures	SUWA	There is no attempt to break dow the assessment by alternative, timeline for meeting PFC, or any real quantitative analysis.	There is not a requirement to include in the Kanab RMP a timeline for meeting PFC. This is an implementation-level decision.
Process and Procedures	SUWA	The BLM should identify the areas in which ORV use is also permitted (where trails would be designated) and each stream's PFC rating, and discuss the combined effects of grazing and ORVs on these riparian areas.	The impacts to riparian areas from grazing and OHV use are described in Chapter 4. The BLM analyzed each route to determine the values adjacent to the routes and potential uses of each route. The BLM applied the criteria described in Appendix K, to determine route identification, including “how route designation would affect setting, recreation activity, and experience opportunities in the area.” This information was used in to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA

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			does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Process and Procedures	SUWA	This pre-determined approach has infected the rest of the draft plan with an assumption that demand for ORV use is high and impacts relatively low. It has affected the development of alternatives, as well, with a complete lack of a proposal which addresses the needs of non-motorized visitors. For example, how many routes designated in the plan are for ORVs and how many trails are proposed for hikers?	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation. BLM is identifying the motorized travel network in the RMP, however this is an implementation-level decision. Trails for non-motorized use (e.g., equestrian, hiking) will be identified in future activity-level planning.
Process and Procedures	SUWA	The BLM avoids dealing with a range of important issues by declaring some beyond the scope of this plan. The issues of public education, enforcement/prosecution, vandalism and volunteer coordination are not addressed, but are critical to adequately analyzing the feasibility of implementing travel planning decisions and DRV route designations.	The issues the commentor raises are implementation-level and outside the scope of this plan.
Process and Procedures	SUWA	Indeed, there are only 274 miles of difference between the routes designated in Alternatives B, C and D - not a meaningful difference in light of the 1,300+ miles of designated ORV routes and over 5000 miles of route total when combined with other dirt roads and trails on all lands. Thus, the DRMP/EIS violates NEPA's requirement that the agency provide a reasonable range of alternatives for the public to consider, and for the agency to analyze in order to make a fully informed decision.	A range of alternatives was considered in developing the transportation system. The process used to identify routes in the transportation system is described in Appendix K. By alternative, routes were considered for closure based on resource concerns and issues and not to achieve arbitrary percentages of miles closed.
Process and Procedures	SUWA	As discussed below, SUWA maintains that BLM has the authority and the responsibility pursuant to FLPMA § 202 to fully analyze and adopt an alternative that would designate new wilderness study areas. BLM's failure to fully consider and analyze such an alternative is fatal to its analysis.	The BLM does not have the authority to designate new WSAs under the land use planning process. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations.

Category Name	Commentor	Comment	Comment Summary Response
			The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs.
Process and Procedures	SUWA	The DRMP/EIS fails to provide an alternative avoiding potential environmental effects of designating particular routes.	A range of alternatives was considered in developing the transportation system. The BLM analyzed each route to determine the values adjacent to the routes and potential uses of each route. The BLM applied the criteria described in Appendix K, to determine route identification, including “how route designation would affect setting, recreation activity, and experience opportunities in the area.” This information was used in to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Process and Procedures	SUWA	Although the DRMP/EIS includes a description of the various recreational opportunity "focus areas" for which recreation can be managed, it is impossible to decipher the acreages within the various classifications under the various alternatives as key information is omitted from the maps and charts. Based on a review of the maps, however, the alternatives fail to provide adequately for quality, dispersed non-motorized recreational opportunities, especially non-structured, primitive and unconfirmed recreation which is not afforded by narrowly defined Recreational Management Zones (RMZs) that cater to specific niche recreation.	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation. BLM is identifying the motorized travel network in the RMP, however this is an implementation-level decision. The RMZ will be further described in future recreation activity plans as they are developed for each Special Recreation Management Area. The Proposed RMP has been adjusted to include 27,770 acres of non-WSA lands with wilderness characteristics. This, in addition to designated Wilderness (21,200 acres) and WSAs (53,900 acres), would provide opportunities for non-motorized, primitive, and unconfined recreation.
Process and Procedures	SUWA	The BLM has not fully considered and analyzed the Vermilion Cliffs Heritage Proposal or meaningfully incorporated it into any of the alternatives.	The Vermilion Cliffs Heritage Proposal in its entirety was considered in the Draft RMP/EIS on pg. 2-32 as an alternative considered but eliminated from detailed analysis. Components of this plan were carried forward for analysis in all the action alternatives and in identifying routes to be included in the transportation system (Appendix K).
Process and Procedures	SUWA	Because BLM has never fully evaluated the no-leasing alternative there is no earlier analysis that BLM can rely upon for this analysis. BLM must therefore fully analyze and consider the no-leasing " alternative, which would provide for no more leasing in the Kanab Field Office - as opposed to simply the maintenance of the status quo of making lands available for leasing in the no-action alternative - in the EIS accompanying the Kanab RMP.	Chapter 2 of the Proposed RMP has been modified to include consideration of a no oil and gas leasing alternative.
Process and Procedures	SUWA	Further, if BLM continues to exclude designation of new WSAs from consideration in the DRMP/EIS, it risks violating both FLPMA and NEPA, and	The BLM does not have the authority to designate new WSAs under the land use planning process.

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		jeopardizing the validity of the entire planning process.	The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs.
Process and Procedures	SUWA	Contrary to its own guidance, it appears that the BLM has provided no "definitions and additional limitations for specific roads and trails;" no "criteria" for the selection of specific roads and trails like those described in the Guidance; provided no "guidelines" for the management, monitoring and maintenance of the trails, and lastly, there are no "indicators" to guide future planning such as the result of monitoring data or other information. Thus, the travel plan violates the BLM's own rules for designating trails.	Appendix K describes the process used to identify routes in the transportation system. The appendix also describes the process and factors to consider in changing route designations within "limited" areas.
Process and Procedures	SUWA	2-3 Based on our examination of the maps, DRMP/EIS and discussions with BLM personnel involved in the RMP and travel plan development it is clear that the BLM did exactly what the Guidance warned against. Instead of actively choosing routes based on sensible criteria like the need for access, desired future condition and the protection of natural and cultural resources, the BLM simply "inherited" roads and trails from county maps and from off-road vehicle advocates.	Appendix K describes the process and criteria used to identify routes in the transportation system. The criteria was applied to the route inventory to determine which routes should be included in the travel plan. The route identification process included a review by the BLM interdisciplinary team which applied the criteria in Appendix K including access needs, protection of natural and cultural resources, and desired future condition.
Process and Procedures	SUWA	As noted above, the DRMP/EIS does not demonstrate a full range of travel types and modes, or other limitations sufficient to protect the resources at risk from ORV use. In particular, while BLM proposes to designate nearly 1,400 miles of ORV routes, there appears to be zero miles of hiking trail proposed in the DRMP.	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation. BLM is identifying the motorized travel network

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		And because of the obvious public safety and other conflicts present, allowing hikers to use ORV trails is not a solution. (2.3)	in the RMP, however this is an implementation-level decision. Trails for non-motorized use (e.g., equestrian, hiking) will be identified in future activity-level planning.
Process and Procedures	SUWA	To address these insufficiencies, the BLM must provide specific information on the purpose and need for the routes incorporated in each alternative, the potential impacts on other resources, and the potential conflicts with other users and the justification for designating the route with the proposed range of uses. The public should then have an opportunity to comment so that this input can be taken into account before issuance of a Proposed RMP/Final EIS.	A range of alternatives was considered in developing the transportation system. The BLM analyzed each route to determine the values adjacent to the routes and potential uses of each route. The BLM applied the criteria described in Appendix K, to determine route identification, including “how route designation would affect setting, recreation activity, and experience opportunities in the area.” This information was used in to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192. The public was provided a 90-day comment period from October 12, 2007 to January 10, 2008. Hundreds of comments were received on the transportation alternatives. The Proposed RMP has been modified based on public comment and BLM review.
Process and Procedures	SUWA	However, the preferred alternative would designate only a small fraction of acreage (6%) evaluated by the BLM to meet the relevance and importance criteria. This is a violation of FLPMA's mandate that "priority" be given to designation of ACECs.	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM’s ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The BLM Manual 1613.23 states that “After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM’s proposals for designation and management of ACECs.” The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect

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			the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.
Process and Procedures	SUWA	This ACEC must be designated if the BLM fulfills its FLPMA obligations to "give priority" to ACEC designation. The BLM well describes both the relevance and importance of this potential ACEC in Appendix H. (Vermillion Cliffs)	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative

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			leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.
Process and Procedures	SUWA	This ACEC must be designated if the BLM fulfills its FLPMA obligations to “give priority" to ACEC designation. The BLM well describes both the relevance and importance of this potential ACEC in Appendix H. (Welsh’s Milkweed)	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM’s ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all

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			potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such

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			other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.
Process and Procedures	SUWA	The BLM must take a hard look at resource damage (direct, indirect and cumulative) that may be incurred with each route.	The process used to designate routes is explained in Appendix K. The criteria in Appendix K was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Process and Procedures	SUWA	This ACEC must be designated ifthe BLM fulfills its FLPMA obligations to "give priority" to ACEC designation. The BLM well describes both the relevance and importance of this potential ACEC in Appendix H. (White Cliffs)	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention.

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			3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.
Process and Procedures	SUWA	BLM must take a hard look at resource damage that may be incurred with each route. (White Cliffs)	The process used to designate routes is explained in Appendix K. The criteria in Appendix K was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Process and Procedures	SUWA	This ACEC must be designated if the BLM fulfills its FLPMA obligations to "give priority" to ACEC designation. The BLM well describes both the relevance and importance of this potential ACEC in Appendix H. (Parunuweap Canyon)	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (M-1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a

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			comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.
Process and Procedures	SUWA	The BLM must take a hard look at resource damage that may be incurred with each route (including direct, indirect, and cumulative impacts). (Parunuweap Canyon)	The process used to designate routes is explained in Appendix K. The criteria in Appendix K was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA

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			does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Process and Procedures	SUWA	The BLM's reasonably foreseeable development (RFD) scenario is arbitrary and capricious and ignores historic development trends in the planning area.	The commentor does not provide an alternative source or method to refine the reasonable foreseeable development scenario (RFD). The RFD was developed not only based on historic data, but was also developed based on projected economic trends and advances in technology. The Utah Geological Survey used the best available data to develop the RFD.
Process and Procedures	SUWA	Throughout the environmental consequences section, the BLM fails to perform an adequate analysis for recreation management pursuant to NEPA.	The BLM performed an adequate analysis of recreation management. As described in Chapter 3, the best available recreation data was used in drafting the Kanab RMP. In addition, the commentor does not provide alternative data or information to incorporate in the analysis.
Process and Procedures	SUWA	The DRMP/EIS Failed to Analyze the Impacts ofClimate Change to the Resources of the Kanab Field Office. This oversight amounts to a failure to take the necessary "hard look" at the challenge of resource management in the Kanab Field Office.	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.
Process and Procedures	SUWA	The BLM should have discussed all of these predicted effects of climate in Chapter 3's assessment of existing conditions and in Chapter 4's discussion ofthe impacts of the various alternatives. A strong argument can be made that over the life of the RMP, no other factor will affect the resources of the Kanab Field Office more than climate change; it must figure as a prominent aspect of the future management ofthe area and BLM must demonstrate that it has begun to grapple with the management challenges that climate change presents.	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.
Process and Procedures	SUWA	We have noted elsewhere that the EIS has not discussed the cumulative effects of various uses like ORV recreation and grazing on, for example, riparian areas. These cumulative effects should also be considered in the context of climate	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing,

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		change and how these uses act synergistically to impact the resources of the Kanab Field Office.	magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.
Process and Procedures	SUWA	NEPA requires BLM to "rigorously explore and objectively evaluate" a range of alternatives to proposed federal actions. See 40 C.F.R. §§ 1502.14(a) and 1508.25(c). Further, an agency violates NEPA by failing to "rigorously explore and objectively evaluate all reasonable alternatives" to the proposed action. City of Tenakee Springs v. Clough, 915 F.2d 1308, 1310 (9th Cir. 1990) (quoting 40 C.F.R. § 1502.14). This evaluation extends to considering more environmentally protective alternatives and mitigation measures. See, e.g., Kootenai Tribe of Idaho v. Veneman, 313 F.3d 1094, 1122-1123 (9th Cir. 2002) (and cases cited therein).	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified.
Process and Procedures	SUWA	The BLM should not designate routes open to motorized use based on the existence of unproven claims under R.S. 2477.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Process and Procedures	Theodore Roosevelt Conservation Partnership	Therefore, we recomment that the Kanab field office should extend the comment period for the Kanab RMP DEIS to provide the public with adequate opportunity to express their concerns and recommendations.	The BLM provided the public with 90 days to review and comment on the Draft RMP/EIS, as required by the BLM land use planning regulations (43 CFR 1610.2(E)). The standard comment period for a Draft EIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(C). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the Draft RMP/EIS. The BLM made the Draft RMP/EIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the Draft RMP/EIS and help focus review and comment efforts. Finally, the BLM held five open houses around the State to facilitate review of the Kanab Draft RMP/EIS.
Process and Procedures	Theodore Roosevelt Conservation Partnership	We believe that the RMP is not adhering to Executive Order 13443, issued on Aug. 16, 2007 and Instructional Memorandum No. 2008-06 issued Nov. 12, 2007. (Available at: http://www.blm.gov/nhp/efoia/wo/fy08/IM2008-006.htm)	The BLM is clearly adhering to EO 13443 and WO IM #2008-006. However, this IM is not a planning level IM. It is a project level IM to evaluate and work with state, local and tribal governments, scientists, landowners, individual sportsmen, non-profit organizations and other interested parties (non-Federal partners) in the development of site specific and national projects. To facilitate collaboration, it is important that the BLM identifies the near-term and long-term actions currently ongoing or under consideration throughout the agency. This will result in a

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			coordinated approach to implementation, while also giving due consideration to the missions, policies and authorities unique to each agency.
Process and Procedures	Theodore Roosevelt Conservation Partnership	Under CEQ NEPA regulations, BLM must make use of all the best available scientific information to assess the effects of land management actions, including cumulative effects from existing, proposed, or foreseeable development projects in the resource management area. Referenced below are peer-reviewed scientific studies on the impacts on sage grouse, elk, and mule deer from vehicle traffic, roads, and oil and gas development. The information from these studies should be incorporated into the FEIS.	The BLM has use the best available scientific information in developing the alternatives and analsyis in the Draft RMP/EIS. In the future, additional research could be considered. Additional research or conservation measures, as proposed by the commentor, could be considered at the site-specific planning level.
Process and Procedures	Tom Grant	There should be more time in this comment period to address the areas of extreme importance to the future of this area.	The BLM provided the public with 90 days to review and comment on the Draft RMP/EIS, as required by the BLM land use planning regulations (43 CFR 1610.2(E)). The standard comment period for a Draft EIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(C). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the Draft RMP/EIS. The BLM made the Draft RMP/EIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the Draft RMP/EIS and help focus review and comment efforts. Finally, the BLM held five open houses around the State to facilitate review of the Kanab Draft RMP/EIS.
Process and Procedures	Tracy Hiscock	Clearly, this BLM RMP does not fulfill the legal requirements of either the National Environmental Policy Act (NEPA) or the Federal Lands Policy and Management Act (FLPMA).	The Kanab RMP complies with NEPA and FLPMA. There have been multiple layers of adequacy review by BLM Utah State Office, Washington Office, EPA, State of Utah, and cooperating agencies.
Process and Procedures	Tracy Hiscock	Many of the already existing ORV routes in the area lead to or go through archeological sites. By allowing such routes to continue, and by failing to assess the impact of motorized vehicles driving over these irreplaceable and scientifically important cultural resources, the BLM RMP falls short of fulfilling the legal requirements of NEPA and FLPMA. Furthermore, the existence of such routes also tempts motorized users to violate the Archeological Resources Protection Act.	Cultural resources were considered in identifying routes. In addition, Section 106 consultation is being conducted. As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the affect and nature of the proposed OHV activity and the expected density and nature of historic properties. The process used to designate routes is explained in Appendix K.
Process and Procedures	Tracy Hiscock	It is my concern that the BLM has failed in its duties under these laws. The RMP will be in place for many years to come. It is the duty of the agency to follow the law, responsibly managing these lands and protecting them for future generations.	The Kanab RMP complies with NEPA and FLPMA. There have been multiple layers of adequacy review by BLM Utah State Office, Washington Office, EPA, State of Utah, and cooperating agencies.
Process and Procedures	Tyler Kokjohn	The draft plan also fails to include any meaningful discussion of monitoring and assessment methods that would support all adaptive management efforts. Instead we are informed that implementation or activity-level decisions “could be adapted.” In addition, “future activity-level plans would follow NEPA guidelines and involve the public.” These are serious oversights in the draft and are not in accord with planning requirements detailed by the BLM itself.	Identifying monitoring and assessment methods will be done during activity-level planning.

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Process and Procedures	Utah Archeological Research Institute	Is there some reason that there has to be four alternatives? What if there are six viable alternatives? What if there are fifteen viable alternatives? Do you combine them or just leave some out? Confining management strategies to four different options restricts management alternatives, and thus it is not an adequate approach to effectively manage our public lands.	BLM has provided a reasonable range of alternatives. As required by NEPA, the Draft RMP/EIS analyzes the current management (Alternative A). Each alternative, except for Alternative A, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (April 2004 through February 2005) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period.
Process and Procedures	Utah Archeological Research Institute	It makes no logical sense to manage public lands for activities that seldom take place while ignoring activities participated in by the greater number of people. We ask that management alternatives be given priority that support the interests of the majority of the people utilizing the BLM Lands in the Kanab Field Office area, as long as the resources can be protected, and that this information be an integral part of the final RMP/EIS.	The commentor provided no additional information on land uses in the Kanab decision area. The alternatives were developed to address the issues raised during the scoping process. The Draft RMP/EIS used the best available information in developing the alternatives (chapter 2) and assessing the impacts of those alternatives (chapter 4).
Process and Procedures	Utah Rock Art Research Association	We are concerned about the process used to identify cultural resource management associated with this RMP. Only 10% of the area has been subjected to detailed cultural inventories. Most of this 10% survey area is based on "compliance with Section 106 of the NHPA, meaning the surveys are conducted as needed to identify cultural resources in a project-specific context and generally are not statistically valid samples of the region." (Page 3-60) Cultural resource decisions on the remaining 90% are the result of known sites and professional judgment (4-96) based on a small survey sample that is not statistically valid. Professional judgment in this context sounds a lot like guessing. It is our understanding that Section 106 (16 U.S.C. § 470t) obligates the BLM to consider the effects of management actions on cultural resources listed or eligible for listing to the National Register of Historic Places. Section 110 of the NHPA requires the BLM to manage and maintain those resources in a way that gives "special consideration" to preserving archaeological and cultural values. Section 110 also requires the BLM to ensure that all historic properties under the jurisdiction or control the agency are identified, evaluated, and nominated to the National Register of Historic Places. Id. § 470h-2(a)(2)(A). How can the BLM claim to be honoring their legal responsibilities when they are not using real data regarding archeological sites to make management decisions? We do not support a decision-making process which is not based on actual rock art and archeological site inventories.	In preparing the PRMP/DEIS, the BLM used the best available information to form the basis for the cultural resources analysis. This baseline data is a result of Section 106 and 110 inventories of the area and represents the volume of information available. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. Future proactive surveys will be completed based on availability of funding and resources.
Process and Procedures	Western Watersheds Project, Inc.	This failure must be corrected to meet the intent of NEPA and in order to provide a comparison of the impacts of livestock on riparian and upland areas, water quality, soils and wildlife under proposed stocking rates as compared to conditions in the absence of livestock. Otherwise, no true evaluation of the impacts of livestock grazing can be claimed.	The BLM did consider an alternative that closed the decision area to livestock grazing, but did not analyze it in detail (see Draft RMP/EIS chapter 2 section 2.3.2). NEPA does not require the BLM to consider an arbitrary range of analysis simply for the sake of analysis. Rather, the CEQ regulations (1502.14) requires the BLM to develop a reasonable range of alternatives, including the no action alternative, the preferred alternative, and other reasonable alternatives to address the issues raised during scoping. The BLM has provided a reasonable range of

Category Name	Commentor	Comment	Comment Summary Response
			alternatives to address the issues raised related to livestock grazing . As required by NEPA, the Draft RMP/EIS analyzes the current management (Alternative A). Each alternative, except for Alternative A, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (April 2004 through February 2005) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period.
Process and Procedures	Western Watersheds Project, Inc.	The Preferred Alternative ignores the ecological impacts of off-road vehicles and allows their use on major portions of the RA, including thousands of miles of roads and trails.	BLM has provided a reasonable range of alternatives. Each alternative represents an alternative means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period on the RMP DEIS. Chapter 4 discloses impacts to resources and resource uses from OHV use and route identification.
Process and Procedures	Western Watersheds Project, Inc.	The lack of an alternative that eliminates off-road vehicles and the lack of analysis of impacts of OHVs violates the intent of NEPA.	BLM has provided a reasonable range of alternatives. Each alternative represents an alternative means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period on the RMP DEIS. Chapter 4 discloses impacts to resources and resource uses from OHV use and route identification.
Process and Procedures	Western Watersheds Project, Inc.	There is no analysis of the impacts of the hundreds of water developments for livestock, the miles of fences and their impacts on wildlife, the loss of riparian and wetland areas due to water developments nor the thousands of acres of watershed and plant community degradation that occur around livestock water developments. There is no analysis of the watershed impacts from livestock grazing including the degree of loss of ground cover, the accelerated rate of erosion compared to natural conditions with intact plant and biological crust communities, the loss of ground water and watershed storage or the impacts on the Colorado River System and its endangered species. The Colorado River Salinity Control Act is not addressed in regards to livestock, erosion, sedimentation and salinity.	Chapter 4 of the Draft RMP/EIS includes an analysis of impacts to soil, water, and vegetation resources from range improvements. Improper grazing was not analyzed in the Draft RMP/EIS because it is not being proposed as an alternative. As stated in Chapter 2 of the Draft RMP/EIS, range improvements would be designed to achieve and maintain healthy rangelands which would minimize opportunities for erosion, sedimentation, and salinity.
Process and Procedures	Western Watersheds Project, Inc.	The DEIS/RMP have failed to meet the intent of FLPMA for sustainable uses that do not impair productivity, have failed to "accelerate restoration" and have abrogated BLM's responsibility for effectiveness monitoring that is meaningful and without bias.	Identifying monitoring and assessment methods will be done during activity-level planning.
Process and Procedures	Western Watersheds Project, Inc.	Resource alternatives provided within the DEIS/RMP are not compliant with the BLM Land use Planning Handbook planning guidance which directs the	The BLM Land Use Planning Handbook (BLM-H-1601-1) was used throughout the development of the Draft RMP/EIS.

Category Name	Commentor	Comment	Comment Summary Response
		identification and analysis of specific rmanagement actions.	
Process and Procedures	Western Watersheds Project, Inc.	Therefore, in lieu of adequate data and analysis, OHV activities and other surface disturbing activities such as recreation, livestock grazing, travel routes, oil/gas and mineral extraction, must be analyzed for elimination or significantly restricted use on public lands within the following sensitive areas:	As is typical in programmatic planning efforts, site-specific data is used to the extent possible. The BLM's ID Team used the best available data to develop a reasonable range of alternatives in the Draft RMP/EIS. Each alternative, except for Alternative A, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (April 2004 through February 2005) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period. The BLM is also required by FLPMA to manage the public lands according to multiple use standards. The term "multiple use" as defined in FLMPA means "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people." This direction indicates that not all uses need to be accommodated in all areas. The Alternatives in the Draft RMP/EIS reflect this provision. Not all areas would be open to all types of uses in the planning area. Additionally, not all areas would be open to uses in the same timeframe. Management actions for all resources are provided in the alternatives, including those that provide protection of sensitive resources.
Process and Procedures	Western Watersheds Project, Inc.	The Kanab FO should at a minimum, analyze alternatives including No Action (status quo), No ATVs, Dirt Bikes or Snowmobiles, or the new experimental playtoys, Personal Aerial Vehicles, and the level of use allowed in the current set of alternatives. Some of the science regarding this issue is presented in the following paragraphs.	As is typical in programmatic planning efforts, site-specific data is used to the extent possible. The BLM's ID Team used the best available data to develop a reasonable range of alternatives in the Draft RMP/EIS. Each alternative, except for Alternative A, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (April 2004 through February 2005) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period. The BLM is also required by FLPMA to manage the public lands according to multiple use standards. The term "multiple use" as defined in FLMPA means "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people." This direction indicates that not all uses need to be accommodated in all areas. The Alternatives in the Draft RMP/EIS reflect this provision. Not all areas would be open to all types of uses in the planning area. Additionally, not all areas would be open to uses in the same timeframe. Management actions for all resources are provided in the alternatives, including those that provide protection of sensitive resources.
Process and Procedures	Western Watersheds Project, Inc.	BLM must review all this information in its analysis in order to meet its obligation under NEPA to take a "hard look" at the effects of its actions.	NEPA does not require an agency to include every piece of research supporting or opposing the analysis in an EIS. The BLM has incorporated an array of technical and scientific research, as well as the professional expertise of the BLM's ID Team members, to develop the alternatives and perform the impact analysis. Unless the commentor identifies specific deficiencies in the Draft

Category Name	Commentor	Comment	Comment Summary Response
			RMP/EIS analysis, the BLM is not obligated to incorporate the variety of references into the Proposed RMP/Final EIS.
Recreation	Alexander Kowalski	Please include in your final RMP access possibilities for personal, non-commercial rock and fossil collecting. Restrictions on mining for commercially valuable minerals, and restrictions on off highway travel directly affects our ability to access remote areas and enjoy our hobby.	All of the alternatives allow for rock and invertebrate fossil collecting. However, to provide the protection of resources and reduce the proliferation of routes, OHV categories would apply to all casual use activities.
Recreation	Bill May	I do not believe that group sizes should be limited to 25 people under the Special Recreation Permit... This number in my opinion is unrealistic and makes group events such as family picnics or scouting events impossible... I believe the rules and authorized exceptions for these SRP's should be clarified and added to Alternative B.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Bill May	"I believe the information and data collected by the BLM in Table 3-26 is faulty. The BLM's own report indicates that critical information was not available for this Table ... In my personal experiences I don't believe the numbers to be accurate...	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Bill May	Special Recreation Permits: I do not believe that group sizes should be limited to 25 people under the Proposed Special Recreation Permit... This number in my opinion is unrealistic and Makes group events such as family picnics or scouting events impossible... I Believe the rules and authorized exceptions for theses SRP's should be clarified And added to Alternative B.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Bill May	I believe the information and data collected by the BLM in Table 3-26 is faulty. The BLM's own report indicates that critical information was not available for this Table… In my personal experiences I don't believe the numbers to be accurate… I Do not believe that any decisions should be made based upon this faulty table	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the

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			popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Bill May	Special Recreation Permits: I do not believe that group sizes should be limited to 25 people under the Proposed Special Recreation Permit… This number in my opinion is unrealistic and Makes group events such as family picnics or scouting events impossible… I Believe the rules and authorized exceptions for theses SRP's should be clarified And added to Alternative B	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Capital Trail Vehical Association	Please explain why the needs of non-motorized recreationists are provided for at a much higher level (quality and quantity) than motorized recreationists?	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation.
Recreation	Capital Trail Vehical Association	Most of the non-motorized focus areas have designated routes open to motorized vehicles] within them. If implemented as written in Alternatives B, C and D, many visitors will perceive these focus areas as establishing blanket restrictions on motorized use. The unintended consequences will likely result in increasing, not reducing actual or perceived "user conflict."	Identifying an RMZ as motorized or non-motorized is intended to reflect the management emphasis for the area as a whole, not whether or not there are identified motorized routes in the area. Generally, routes in non-motorized RMZs are used for accessing non-motorized recreation within the area. Conflicts between motorized and non-motorized users in these areas are described in chapter 4.
Recreation	Capital Trail Vehical Association	Because vehicles are not permitted to travel off designated routes - for any reason - the Kanab BLM is proposing a "vehicle camping only in designated campsites" in the entire Field Office. Such a restrictive policy would be appropriate for National Parks or National Monuments, but for Public Lands this is truly unheard of.	Chapter 2 of the Draft RMP/EIS (page 2-78) allows for vehicle parking for dispersed camping within a range of alternative distances from designated routes. There is no restriction to vehicle camping only in designated campsites.
Recreation	Capital Trail Vehical Association	All planning projects should disclose the added benefit to non-motorized recreational resources resulting from the closure of roads by adding the miles of closed roads to the miles of existing non-motorized trails. We request that this procedure be used by this project and all future agency projects. Additionally, we request that the cumulative negative impact on motorized recreationists resulting from this lack of adequate accounting be evaluated and adequately mitigated.	The impacts requested by the commentor are already contained in the Draft RMP/EIS chapter 4 (starting on page 4-179).
Recreation	Chris Bell U4WDA	Not limiting group sizes under special recreation permit rules.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Chris Bell U4WDA	Elimination of the user statistics (table 3-26) since they are clearly flawed.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures

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			in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	David Armbruster	Table 3-16, Recreation Visitation, is based on unreliable information and should not be used as planning criteria in the RMP process. Specifically this Table appears to be very biased towards a specific user group and seems to utilize badly flawed data.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	David Fackrell	I never remember seeing a hiker or back packer, which leads me to believe that your data shown in Table 3-26 is incorrect. I ran into an occasional hunter on foot, but never a hiker or back packer. It is inconceivable to me that so much of the public lands should be closed to use of so many.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use.

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			Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	David Fackrell	I never remember seeing a hiker or back packer, which leads me to believe that your data shown in Table 3-26 is incorrect. I ran into an occasional hunter on foot, but never a hiker or back packer. It is inconceivable to me that so much of the public lands should be closed to use of so many.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	David Fackrell	Special Recreation Permits: should not be required of groups of 25. Such a low number would eliminate Family Reunions, Church Groups and ORV Clubs using our public lands. Numbers over 100 is more feasible.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Desiree Smith	I feel that the special use permits should not be reduced to 25 per group.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Don Black	Making it impossible to hold these organized events by prohibitive SRP requirements is a step in the wrong direction. It does nothing to stop the individuals who are uninformed or disrespectful and cause damage to resources, but does restrict those that would be trying to educate against abuse of public lands. The SRP requirements as shown in Alternate B are unworkable as written.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Don Black Canyon Country 4x4 Club	The Special Recreation Permit requirements as written in Alternate B are totally unworkable. As written, not only would organized 4x4 and ATV events be unlikely, but probably any organized events like family reunions, scout camps or even a large barbeque. Clear cut guidelines are needed for when a SRP is required. The Group size limit of 25 people is totally unrealistic.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Don Black Canyon Country 4x4	We believe that none of the Alternates have adequately addressed the issue of Heritage Tourism. Many of the routes listed in Alternate B to be closed, go to	Heritage tourism is addressed on page 2-79 of the Draft RMP/EIS. The Proposed RMP/Final EIS modified route designations based on consideration of historic,

Category Name	Commentor	Comment	Comment Summary Response
	Club	areas that include historic, cultural and natural resources that have been visited by people for many years for thise purpose of experiencing settings that represent the past.	cultural, and natural resources in the area.
Recreation	Don Black Canyon Country 4x4 Club	Table 3-26 appears to be very unreliable and slanted towards a specific user group. Anyone who has spent any time in any of the areas managed by the KFO can see how greatly flawed this table is. Some special interest groups are making grossly inaccurate statements using this table as evidence. Unless there is some data that could give some credence to the highly unbelieveable numbers on the table, we ask that this table be removed in it's entirety from the RMP documents as it is being misused to distort issues rather than determine how areas should be managed. Also, this table is contradicted in 4.1.6; Incomplete or Unavailable Information, which states; "Direct recreation visitation based on actual use and economic expenditure data associated with such use"	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Don Black Canyon Country 4x4 Club	We believe that the management action for Special Recreation Permits as shown in Alternate B is totally unreasonable. It would seem to be an arbitrary attempt to eliminate any organized group events. There have been SRP's issued to local clubs for events and I am not aware of any problems arising from these permitted events. There is no justification for these excessive restrictions.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Don Black Canyon Country 4x4 Club	Just with the points I brought up here indicates the fact that the tables 3-26 Recreation Visitation were poorly done and should NOT be used to justify any decision on land use overall.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Don Black U4WDA	The Special Recreation Permit requirements as written Alternative B are totally unworkable. As written, not only would organized 4x4 and ATV events be	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria

Category Name	Commentor	Comment	Comment Summary Response
		unlikely, but probably any organized events like family reunions, scout camps or even a large barbeque. Clear cut guidelines are needed for when a SRP is required. The Group size limit of 25 people is totally unrealistic.	listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Don Black U4WDA	Table 3-26 appears to be very unreliable and slanted towards a specific user group. Anyone who has spent any time in any of the areas managed by the KFO can see how greatly flawed this table is. Some special interest groups are making grossly inaccurate statements using this table as evidence. Unless there is some data that could give some credence to the highly unbelievable numbers on the table, we ask that this table be removed in it's entirety from the RMP documents as it is being misused to distort issues rather than determine how areas should be managed. Also, this table is contradicted in 4.1.6; Incomplete or Unavailable Information, which states; "Direct recreation visitation based on actual use and economic expenditure data associated with such use."	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Donald Kramer	SUBJECT STATISTICS CHARTED IN TABLE 3-26 RECREATION VISITATION. I believe the estimates in this table are extremely misleading at best and extremely slanted to support the point ofview that wants OHV use stopped or curtailed. First the idea of limiting a user day to twelve hours at the resource is ludicrous. This slants the use ofthe resource to those disciplines that require more time in the field. In order for 20.000 backpackers to get five user days they would spend 2.5 , 24 hour days at the resource. The estimate of 20,000 backpackers in the Kanab Field Office area looks awfully high especially if you take away those backpackers in the Wire Pass Coyote Butte area, an area where accurate statistics are available. The OHV use block appears low in the overall numbers and since the inaccurate way of calculating "user days needs 12 hours, it may take OHV users two or three trips to total a user day. A user day should be calculated as any day or part of a day the user visits the resource, even if it is only a short while. This would give a more accurate picture of land use by recreationists. Big game hunting is the worst example ofstatistics I have seen. On 11-06-2007 I attended a Utah Dept of Wildlife Regional Advisory Committee meeting in Hurricane. At that meeting the biologist reported that Big Game Hunters spent an average of 4 days in the field during the " Any Weapon season". According to your "estimates" the hunters spend less than a day and a half in the field. The biologists were going to ask the Wildlife Board to extend the deer season in the Southern Region to nine days. This however was rejected by the board. Your "estimates" of32,463 Big game hunters is way off. There were 16,200 any weapon deer permits during the 2007 season and this encompasses	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.

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		the entire southern region. An area that encompasses 1/4 ofthe state. And 14,000 archery permits statewide. Elk permits in the subject area were 7, the antelope permits limited to 5 and the general elk hunting (no permit required) limited to the Zion unit that is mostly private land.(These numbers are from the 2007 Utah Big Game publication). All other hunts in the region were mostly on Forest service land. Along with the fact that very few archery hunters hunt the lower sage-juniper land that makes up the lower halfofthe Kanab field office area would reduce those numbers drastically. (during the archery season the migratory mule deer herds are up higher in the pine-aspen forest). As you can see these numbers are way off from the "estimates" in table 3-26. If accurate hunter numbers were multiplied by the documented 4 user days the hunter numbers would be lower but the user days would be higher. In addition almost all hunters use OHV access to get into the more remote hunting areas. Just with the points I brought up here indicates the fact that the tables 3-26 Recreation Visitation were poorly done and should NOT be used to justify any decision on land use overall.	
Recreation	Donald Sprecher	5: An explanation why the BLM used in the resource plan the chart that showed usage by the various recreation groups based on estimates and not real numbers. I strongly protest using that chart as a basis of information in decision-making, because it is flawed. There is nothing in place for OHV users to log into any kiosk, or station, so the BLM can obtain an accurate number of users and user hours. I feel the BLM is making decisions based on unknown real numbers.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Duane Smith	I feel that the special use permits should not be reduced to 25 veh. per group	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Duane Smith	I feel that Table 3.26 should be eliminated-that data is flawed and inaccurate	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct

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			visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Earl Stuker	Alternative B (Preferred) has some excellent points. Some modifications I would like to see are the following: A. Manage three RMZs specifically for motorized uses (21, 800 acres) I think this should read 42,000 acres. B. Manage six RMZs specifically for non-motorized uses (44,900 acres) I think this should read 21000 acres. C. You do not have to close a land to study it for a prospective wilderness area.	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation. The land use plan does not propose to study any lands for wilderness designation, except for WSAs which are mandated by Congress.
Recreation	Evan Day	Please include in your final RMP access possibilities for personal, non-commercial rock and fossil collecting. Restrictions on mining for commercially valuable minerals, and restrictions on off highway travel directly affects our ability to access remote areas and enjoy our hobby.	All of the alternatives allow for rock and invertebrate fossil collecting. However, to provide the protection of resources and reduce the proliferation of routes, OHV categories would apply to all casual use activities.
Recreation	Gary Tsujimoto	I think that some of the data in 3.26 is flawed and should NOT be considered.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Geno Ramsey Canyon Country 4x4	I do not believe that group sizes should be limited to 25 people under the proposed Special Recreation Permit. This number in my opinion, is unrealistic and makes group events such as family outings or scouting events impossible. I believe the rules and authorized exceptions for these SRP'S should be clarified and added to Alternative B.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.

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Recreation	Geno Ramsey Canyon Country 4x4	I believe the information and data collected by the BLM in Table 3-26 is faulty. The BLM's own report indicates that critical information was not available for this table.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Glenn Wimpee	Please include in your final RMP access possibilities for personal, non-commercial rock and fossil collecting.	All of the alternatives allow for rock and invertebrate fossil collecting. However, to provide the protection of resources and reduce the proliferation of routes, OHV categories would apply to all casual use activities.
Recreation	J. Capozzelli	There needs to be adequate opportunities to get out of earshot of motorized trails. Currently the large majority of the lands BLM manages are within 1 mile of a motorized road or trail. This is not acceptable in Southern Utah, one of the most remote and unspoiled parts of the lower 48. Therefore many routes which penetrate deeply into otherwise roadless areas should be closed, in order to have a more balanced spectrum of near-road and far-from-a-road recreational opportunities.	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation.
Recreation	Jacalyn & Charles Liebfried	Table 3-26 is almost a complete fabrication. In logging over 6,000 off highway miles in Kane county we have encountered few vehicles and NO backpackers. Unless these hikers are raking out their tracks as they go, they simply do not exist.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.

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Recreation	Jack Christensen	1) Special Recreation Permits should be left as is not limit group size to 25.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Jack Christensen	User statistics in Table 3.26 seem to be flawed and should not be considered because it shows analysis and decision towards hiking at the expense of motorized use. There are far mor 4x4's and ATVs than hikers in the Kanab area.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Jack Johnston U4WDA	Special permit for groups over 25 means my family reunion, 32, would require a permit. Make it at least 40-50.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	James & Lorna Sills	Special Recreation Management Areas (SRMA) The DRMP needs to provide more direction on how these areas are to be managed. The "focus areas" need to be inclusive and avoid excluding other uses categorically.	Appendix D of the Draft RMP/EIS describes in more detail how the SRMAs will be managed. An activity level plan for each SRMA will be completed after the record of decision is signed.
Recreation	James & Lorna Sills	Special Recreation Permits We do not support the Special Recreation Permit requirements as currently proposed in Alternate B. The group size limit of 25 people is unacceptable. We frequently have 4 people in our vehicle alone and like to travel in groups or travel with a club. Clear-cut guidelines need to be established for when a SRP is required.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	James & Lorna Sills	Recreation Visitation We take exception to Table 3-26. Having visited areas managed by the KFO it is plain to see that this table is greatly flawed. Further, certain special interest groups are making grossly inaccurate statements based on this. We would like to see Table 3-26 removed completely from the RMP.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict.

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			Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	James Bulkeley	The alternatives are also flawed in that they do not address any mitigation measures for loss of motorized recreational opportunities.	BLM is not required to mitigate for loss of motorized recreation opportunities. Under FLPMA's multiple-use mandate, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple-use concept, the BLM does not necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands. Chapter 4 of the Draft RMP/EIS describes the impacts to recreation opportunities from other resources and resource uses.
Recreation	James McEwen	Please include in your final RMP access possibilities for personal, non-commercial rock and fossil collecting. Restrictions on mining for commercially valuable minerals, and restrictions on off highway travel directly affects our ability to access remote areas and enjoy our hobby.	All of the alternatives allow for rock and invertebrate fossil collecting. However, to provide the protection of resources and reduce the proliferation of routes, OHV categories would apply to all casual use activities.
Recreation	Jay McIlwaine	Coral Pink Sand Dunes etc.. Our noninvasive hiking trips are becoming harder to enjoy and sadly more infrequent. Off road vehicles are quickly and effectively destroying our ability to be "untrammeled".	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation.
Recreation	Jerry & Cindy Foote	Table 3-26 in Chapter 3 of the Draft has obvious errors in it. Specifically: 1. The number of backpackers during the 05-06 year is listed as 20,000. This number is 3 times the entire population of Kane and Garfield counties. If that number was correct the influx of that many people would be highly noticeable in both parking areas of trail heads and at the grocery stores in the counties. The claim that these "20,000" backpackers spent on average 5 nights in the field clearly indicates that the BLM staff has not been in the field or they would have noticed that these people are not there. As one that has been in the field both hiking and ATVing it is clear that these numbers are highly inflated. 2. To indicate that the number of big game hunters in the Kane and Garfield counties during the 05-06 year is 36,726 implies that there have been hunting permits for 36,726 hunters. A quick look at the Utah Division on Wildlife Resources information shows that the permits issued during these years is only about 30% of that number.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.

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Recreation	Jerry & Cindy Foote	We would like to comment on the Special Recreation Permit group size limitation. Limiting groups to less than 25 individuals is unrealistic and abridges the people's rights to access to public lands. Many times family picnics, scouting events, club outings would normally exceed this limit. As the present permitting process is very involved, lengthy and requires months of pre-planning it would not be possible to hold an event based on weather or other circumstances. With the current work load of the Field Office permits would not be available in a timely manor.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Jim & Bonnie Vann	The Recreation Management Zone in Hog Canyon is a good example of intelligent management as it is close to town for visiting tourists, already provides ample roads to travel, and is a cooperative effort with the BLM and the Canyon Country 4x4 Club. I support this RMZ and suggest that future expansion of it be considered, or at least not excluded. I am aware that Kane County is proposing a similar SRMA for the John R. Flat area, and I support the County's efforts to that end. I also support Kane County's legal right to protect both their road rights, and our access rights to areas provided under RS-2477 Statutes. I believe that the BLM should recognize those rights for all Utah counties and should not consider any final road closure decisions until the validity of those claims are resolved. I fully intend to support any litigation that the County finds necessary with both my tax dollars and individual contribution if necessary.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Recreation	Jim & Bonnie Vann	1.) The road out to Hell Dive is an old established road that was originally put in for ranching purposes and qualifies as part of Kane Counties RS-2477 road rights, and I support those rights . It currently traverses a State School Section and terminates just a short distance further at a spectacular Indian site hidden under the rock rims with beautiful Indian drawings on the walls, and grinding stones still in place. This area has been visited by local residents for well over 100 years and shows virtually no signs of impairment or degradation. This is a beautiful destination site to take people to who are unfamiliar with the Indian cultures. A short time spent in silence here conjures images of ancient native peoples working, cooking, and playing under the overhanging cliffs. This area would make an excellent interpretive site for the BLM while still allowing the public to visit and enjoy it. This area would lend itself to a cooperative effort between the OHV communities and the BLM as a project to fence the end of the road at its current location with a kiosk containing interpretive information for visitors as a "cultural resource" area.	The Proposed RMP/EIS has been adjusted to open the route to Hell Dive. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Recreation	Jim and Bonnie Vann	2.) The second road is to the west of the one just described and terminates at a viewpoint on the south rim of the Virgin River Gorge just east of Rock Canyon.. This is also a Kane County RS-2477 road and should remain open. Like the above described road, it is a significant "visual resource" for its view into the Virgin River Gorge and travel is not possible beyond its current end. To reach this spot, you would have to travel over 15 miles by OHV to the edge ofthe WSA, and then walk approximately 2 miles in soft sand to the viewpoint end. No one would	The Proposed RMP/EIS has been adjusted to open the route to Rock Canyon. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.

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		do this, and you would be denying the general public the ability of enjoying this spectacular view.	
Recreation	Jimmy Page U4WDA & Wasatch Cruisers	*Special Recreation permits should not be limited to 25 or less. (Many clubs are >25.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Jimmy Page U4WDA & Wasatch Cruisers	*Table 3.26 in the RMP is flawed and eliminated due to should be eliminated due to incomplete data (as stated in the RMP).	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	John Veranth	Regarding parking pullouts for hiking, picnics, and car camping along open vehicle routes, this seem to be an issue that always gets lost between the OHV and Wilderness advocacy groups. The RMP should explicitly address this issue. In general, vehicle travel immediately adjacent to the designated route (for example 25-33 ft) for the purpose of parking should be allowed. In more sensitive areas an adequate number of informal parking areas or spur should be designated to concentrate this type of use adjacent to open routes.	Page 2-78 of the Draft RMP/EIS allows for vehicle parking for dispersed camping.
Recreation	John Veranth	Perhaps I did not read carefully enough, but mountain bikes also seem to have gotten lost between the OHV and Wilderness advocacy groups There seems to be no consideration of non-motorized single-track routes, but I presume some mountain bike groups will comment. Mountain bikes are mentioned as non-motorized in 3.5.1 and the use statistics in Table 3-26 seem totally inconsistant with my "eyeball" observations of bike groups along Hwy 12 alone.	Although the RMP does not designate specific routes for mountain bike use, mountain bikes are allowed on all routes open to OHV use. Additional trails may be added during the implementation phase and would be addressed in recreation activity plans.
Recreation	John Veranth	In fact, it appears that all of Table 3-26 is badly skewed by the fact that many activities are hard to count and use surveys are incomplete. Counting trailers at an ORV trailhead is an easy way to estimate use. Picnicking and day hiking on BLM land are very dispersed and since on registration is required there is no efficient way to get a count beyond a sampling and extrapolation study. As a	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct

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		specific example, I frequently hike onto nearby BLM land starting either directly from my private property or after walking a only short way on the public road. There is no way such use will be included in the visitor statistics, but it represents real user days, and there are many, many others who do similar informal hikes. If I drive my stock SUV to a trailhead on a county road and then start walking is this counted as "OHVs (Cars/Trucks/ Sport Utility Vehicles) and All- Terrain Vehicles" or as "Hiking/Walking/Running" or both? Further, I question whether environmental and nature study really jumped from 0 in 2004 to 3352 in 2005 - rather I suspect the prior years were really (N/M = not measured). Although the DEIS acknowledges the limitations of the data in 3-26 on page 3-77, I want to remark that management decisions based on these statistics are flawed since "direct monitoring by BLM staff ... focused on areas of greater use and conflict" is likely to overstate use at motorized play areas and motorized trail heads. Thus the BLM statement p3-80 that "More recreationists participate in OHV riding than in any other form of recreation use," is likely to be inaccurate due to systematic undercounting of hiking, wildlife watching, sightseeing, photograpy, and picnicking.	visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	John Veranth	Regarding the "quantitiative objectives" for the recreation management zones. I am not sure what "75% of responding visitors" means if you ask hikers about benefits of OHV play areas (or conversly ask OHV riders about benefits of non-motorized areas). This whole criteria discussion seems artificial and contrived.	The BLM recreation guidance for benefits-based recreation directs the land use plans to develop recreation management objectives for each RMZ which are time oriented, measurable, and obtainable.
Recreation	Land Use Volunteers of Kane County	This projection of future OHV travel and impacts on our public land needs to be completed and included in the planning process before approving a Travel Plan for the Hog Canyon and JR Flat areas.	The current use and projected trend of OHV recreation was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation. Additional routes can be added, removed, or modified at the implementation level (see Appendix K).
Recreation	Laura Welp	This SRMA should not be implemented until further studies show that the OHV impact to this plant would not affect its reproduction.	The impact analysis of OHV use on special status species is found in section 4.2.5 of the Draft RMP/EIS.
Recreation	Lisa Rasmussen	I go 4-wheeling with my rig with various clubs and often times it is with more than 25 rigs. To break up a party for arbitrary reasons is ludicrous.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Lisa Rasmussen	The RMP statistics are flawed. Please take out Table 8-26.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the

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			popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Liz Kolle	I'd like to see KFO develop a campground for RVS, to replace the Dry Lake Bed as a camping area. I'd prefer the WSA there to be closed to overnight camping.	The development and location of campgrounds are implementation level decisions that will be considered in site-specific NEPA analysis.
Recreation	Marlin Sharp Lone Peak 4 Wheelers	Concerning Special Recreation Permits. I do not believe that group sizes should be limited to 25 people under the proposed Special Recreation Permit. .. This number in my opinion is unrealistic and makes group events such as family picnics or scouting events impossible I believe the rules and authorized exceptions for theses SRP's should be clarified and added to Alternative B. If the BLM were to require permits for all "groups", and only allow each group to consist of 25 people, even a weekend club 4x4 run or family reunion would have to apply for a permit, a lengthy, expensive and troublesome process in most cases. For groups of over 25 people, that permit would have to be evaluated and authorized on a "case by case" situation, meaning the BLM has no set guidelines for authorizing larger groups.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Melissa Gardner	Please do not limit the group size to 25.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Merlin Esplin	All action alternatives propose to "prohibit OHV or mountain bike tours in... " as listed on page 2-81. BLM cannot enforce the restrictions currently in place. Please be wise and careful when considering additional restrictions.	BLM has developed management prescriptions based on the resource needs. During the process, BLM has made the assumption that users will comply with the rules in affect. In addition, BLM is committed to continuing to develop partnerships with organizations and user groups to continue monitoring and patrolling of high-use areas and these efforts may enhance BLM's law enforcement capabilities.
Recreation	National Parks Conservation Association	The BLM has completely failed to address the impact that the proposed Alton Coal Mine or increased oil and gas development would have upon the pristine night skies within the parks.	Night skies were addressed in chapter 2 under Recreation Management Alternatives. A specific impact analysis of a coal mine or increased oil and gas development on night skies and specific mitigation measures to address issues would be addressed in site-specific NEPA analysis.
Recreation	Richard Csenge	In addition, by their very nature, motorized uses of public lands impact very large areas due to the speed and power, and noise ofthe machines, disturbing wildlife, and creating conflicts with other uses, such as non-motorized recreation. It is therefore necessary that separate recreational management zones be established and enforced for motorized and non-motorized use. Until such time as Congress decides , establishment of such zones must not violate existing wilderness, WSAs, or non-wilderness lands with wilderness characteristics, which	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation.

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		are specifically contained in the America's Red Rock Wilderness Act, pending in U. S. Congress.	
Recreation	Richard Csenge	In Alternative B and D, Maps 2-17 and 2-19, BLM appears to be designating open routes for motorized travel within the Parunuweap, and Moquith WSAs. Maps 2-9, and 2-11 seem to introduce motorized RMZs into WSAs. Is this not against federal law, and will not such mismanagement inevitably lead to resource impairment? Vegetation damage from OHVs is prevalent in each of these areas, which are already being impacted by a multitude of meandering routes created by motorized vehicle travel. In addition, maps 3-10 and 3-11 list these areas as crucial, high, or substantial habitat for mule deer. Frequent and increasing intrusions by OHVs over the term of the RMP may significantly reduce, if not eventually banish herds from these areas. One prime public interest, that of hunting, would surely be adversely impacted.(see enclosures #4 & #5) Such management would be contradictory to the preservation of resource values as required by law. In this regard, only alternative C, indicated by Map 2-18, provides the bare minimum of protection that wildlife deserves.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Chapter 4 describes impacts from the presence and use of OHV ways and routes in WSAs.
Recreation	Russell Howe	First, I believe that putting a 25 person (group size) limit is a mistake. This would surely limit many family activities, (reunions, events, etc.) as well as scouting events, group rides, camping parties, etc. In my own extended family we frequently visit parts of our beautiful state in large camping groups, and would no longer be able to visit this affected region.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Scott Howe U4WDA, TLCA	I do not support the requirements for the special recreation permits. These requirements are unreasonable and severly limit the possibility of group events. Group events are a crucial part of responsible recreation where as people can learn from others proper off highway recreation habits & show group support for areas. Groups provide the possibility for service projects that help to manage public land.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Seth Bowers U4WDA	1) The limit of special rec permits to 25 is unreasonable. My family reunions would not be allowed under this rule.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Seth Bowers U4WDA	2) Table 3.26 is grossly distorted. Data collected is flawed by the BLM's own admission. The table should be removed in its entirety.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the

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Recreation	Spencer Decker	I am extremely concerned with the BLM plans to open up this area to additional roads and ORV trails. There is plenty of space in the region to accomodate both hikers, canyoneers and ORV recreation, but they cannot effectively exist on top of each other.	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation.
Recreation	Steven Edmunds	Special recreation permits - do not reduce the size of the groups - you will be requiring my family to seek permits for annual family reunions.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Steven Edmunds	The use statistics are wrong - these statistics in table 3-26 should be removed or replaced with accurate data.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Susan Hand	The area of the Vermilion Cliffs between Kanab and Johnson Canyon. The subdivisions in this area were established as equestrian developments, and many residents ride their horses on adjacent BLM lands. ATV's and horses are generally not compatible. Many property owners object to the trespass, dust noise, erosion, and scarring created by the proximity of motorized recreation to the subdivisions along this narrow corridor.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system in the future. The Proposed RMP/FEIS eliminates cross-country travel in this area.
Recreation	Susan Hand	I'm especially disappointed by the motorized activity which has been allowed on the Dry Lake Bed adjacent to the Coral Pink Sand Dunes. Proximity of the campground to the WSA has resulted in repeated and extensive OHV use within	The development and location of campgrounds are implementation level decisions that will be considered in site-specific NEPA analysis.

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		the closed area, even though it is signed. The RMP should create a more appropriate campground and close the Dry Lake Bed.	
Recreation	SUWA	This DRMP/EIS does not provide equal recreational opportunities for non-motorized uses - or even try to move toward some semblance of balance.	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation.
Recreation	SUWA	Under the plain language and intent of these provisions, the BLM has not provided a reasonable range of alternatives for the designations of SRMAs and RMZs to sufficiently address the aforementioned increasing damage caused by ORV use, including conflicts between recreationists.	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, four alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action.
Recreation	SUWA	The Kanab Field Office has failed to take a hard look at the impacts of motorized uses in designated SRMAs. For example, the DRMP/EIS discusses potential impacts to soils from the designated SRMAs in the preferred alternative (B)	The impact analysis of OHV use on special status species is found in section 4.2.5 of the Draft RMP/EIS.
Recreation	SUWA	BLM should develop and choose an alternative that manages a significant portion of the planning area as non-motorized. BLM should also take the requisite hard look at impacts from the designated SRMAs and lack of SRMAs before moving forward. This hard look should naturally include the new alternative with more specific non-motorized use in SRMAs in order to be in compliance with NEPA, the CEQ regulations, and case law.	Under the Proposed RMP, management of several SRMAs include recreation management zones for non-motorized recreation. In addition, 27,770 acres of non-WSA lands with wilderness characteristics are included in the Proposed RMP. Under FLPMA's multiple-use mandate, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple-use concept, the BLM does not necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands.
Recreation	SUWA	BLM should choose Alternative C rather than the preferred alternative in order to better protect the planning area from damage caused by large events. The factors weighed before an SRP is issued should be further defined, with clear guidelines. The Kanab Field Office should also consider using the model provided by the Price Field Office DRMP/EIS for classification of SRPs to show what uses may be appropriate/inappropriate in what areas.	The criteria recommended by the commentor was included in Alternative B of the Draft RMP/EIS on page 2-80. The criteria allows for management to be adapted to changing nature of the terrain, resources, time of year, size of the gathering, location of the gathering, etc. For example, a group gathering in open sand dunes outside of WSAs could logically support more vehicles and participants than a similar gathering near a riparian area with sensitive habitat.
Recreation	SUWA	There are several factors the BLM should always take into account before an SRP is issued. The DRMP/EIS for management of a particular area provides the ideal forum to list such factors by which each SRP should be weighed in future actions. At a minimum, the DRMP/EIS should address the following : • Duration of permit - all permits should be limited to a temporary and short term activity. SRPs should only be issued on a one-time basis and should not be extended to last for an inordinate amount of time. For example, a ten-year SRP would be an abuse of discretion on the agency's behalf. • Number of vehicles permitted -the	The Federal regulations at 43 CFR 2930 and the BLM Handbook (H-2930-1) govern the issuance of SRPs. Permit durations are managed according to BLM Handbook H-2930-1, and are tailored to the specific proposed use. The effects of SRPs on various categories of land management are analyzed at the site specific level when issuing a SRP. Page 2-80 of the Draft RMP/EIS lists some criteria to be considered when issuing SRPs.

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		DRMP must include a limit on the number of vehicles, and description of the type of vehicles that would be considered for specific areas in which SRPs would be considered in order for the decisionmaker to assess the potential for damage to environmental and cultural resources. • Type of vehicles - the BLM should delineate these categories and the number permitted by type before an SRP is needed. Different categories of vehicles (e.g., kayaks, motorized boats, mountain bikes, dirt bikes, ATVs, high clearance jeeps ("rock crawler")) have different impacts and require different management prescriptions. However, the current DRMP/EIS does not define what constitutes a "vehicle" for the purpose of SRPs • Number of persons permitted - a threshold should be set for how many people within a group will trigger the need to apply for an SRP. Even without vehicles, large group activities can have a significant impact on environmental and cultural resources. Thus, management of such events will need greater attention/restrictions in order to mitigate these impacts. • Location of SRPs - the DRMP/EIS should specifically identify areas that are not appropriate for the issuance of SRPs. Such areas should include Wilderness, Wilderness Study Areas, non-wilderness study area lands with wilderness characteristics, riparian areas, and any lands that currently are being evaluated or managed for their primitiveness and sense of solitude. Conversely, there should also be locations identified where SRPs may be acceptable. This can be done through the designated of SRMAs/ERMAs, using the ROS as a baseline. • Number of permits per year - there should be a cap on how many SRPs may be issued within a specific area. This can be done through the designated of SRMAs/ERMAs, using the ROS as a baseline. Limiting the number of SRPs will help the Kanab Field Office implement its policy of better prioritizing uses associated with SRPs by only permitting activities that fit squarely with the best management of each area.	
Recreation	Theodore Roosevelt Conservation Partnership	Given the long-term nature of energy development, the BLM should include a plan in the FEIS for compensating hunters for the loss of big game that might occur as a result of energy development.	BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. As described in Appendix C of the Draft RMP/EIS timing limitation stipulations on oil and gas leasing would protect big-game habitat.
Recreation	Thomas Forsythe	Beyond that, anyone wishing to enjoy the viewpoints and landscape of the area below Thompson Point can do so on the one recognized Kane County road. No further motorized access is either necessary or warranted. This could be accomplished by including this area in the Kanab Community SRMA - Non-Motorized Trails RMZ	The Proposed RMP/EIS has been adjusted to open the route to Rock Canyon. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Recreation	Tim Rasmussen	Do not limit group sizes to 25 vehicles. We often travel with groups larger than this and it would limit our enjoyment of this sport.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Tim Rasmussen	Some of the statistics used for the RMP are flawed, such as Table 3-26 and should be eliminated.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on

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			page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Timothy Zimmer	The SRMA proposals should not exclude any user categorically.	The SRMA boundaries and management are based on guidance in appendix C of the BLM land use planning handbook (H-1601-1). SRMAs are areas that require a recreation investment, where more intensive recreation management is needed, and where recreation is a principal management objective. These areas often have high levels of recreation activity or are valuable natural resources.
Recreation	Timothy Zimmer	I reviewed Table 3-26 and agree with the “U4WDA” group that this cannot be based on reality since these areas are fairly remote and not used predominately by the specific user groups it implies. I would like to see the raw data or surveys that supposedly generated this mythical table, especially since it was contradicted in 4.1.6.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	Tobin Gardner	Please don't limit the group size to 25.	The special recreation permit management action allows for flexibility in determining if the permits are required. Permits are required based on the criteria listed on page 2-80. If a permit is required then the group size would be limited to 25 people. On a case-by-case basis, BLM can authorize exceptions to this limit after evaluation of possible or likely resource impacts.
Recreation	Tobin Gardner	I believe the RMP user stats are not correct. Table 3.26 should be elimited.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on

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			page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies.
Recreation	U.S. Fish and Wildlife Service, Utah Field Office	Page2-72, Section 2.4.1: We do not support Alternative B for the Moquith Mtn, Dunes RMZ. A requirement for research and monitoring of OHV impacts to both Welsh's milkweed and Coral Pink Tiger Beetle should be included in all alternatives. Research and monitoring is necessary to ensure accurate assessment of impacts, particularly from ongoing OHV use, and development and implementation of effective conservation management strategies.	The BLM is required by FLMPA to maintain an inventory of its resources. Reiterating such a requirement in the land use plan is not necessary. Additionally, the Conservation Agreement and Strategy for the Coral Pink Sand Dunes Tiger Beetle and the Welsh's Milkweed Recovery Plan include language that address monitoring and research. Both of these plans are incorporated into the Draft RMP/EIS by reference.
Recreation	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-72, Section 2.4.1: Alternative A indicates that the Sand Spring area would be designated closed to OHV use. Please clarify if Alternative B would maintain or expand use at Sand Spring. Also please clarify the extent and location of the conservation areas that are referred to in Alternative B.	The Sand Spring area was closed to OHV use by limiting the area to identified routes and not identifying any routes. Additionally, the area was fenced. Draft RMP/EIS does not identify any routes in this area or open the Sand Spring area to cross country OHV use. Chapter 4 of the Draft RMP/EIS identifies the impacts from OHV use along routes. The conservation areas were identified in the Vermilion MFP amendment (2000) with associated Section 7 consultation with the USFWS. These areas are mapped in that document and the maps are included in the administrative record of this planning process.
Recreation	Utah Archeological Research Institute	We ask that you please include a section with alternatives on target shooting. We further ask that the preferred alternative ban all target shooting with gun-powdered projectiles on public lands.	Eliminating target shooting is not a land use plan decision. The Draft RMP/EIS is not required to include a detailed analysis of illegal activities. Enforcing the RMP decisions is an implementation-level action.
Recreation	Walter Fertig	Recreation management: I commend the Kanab FO for adopting "Special Recreation Management Areas" as a planning and management tool. This is something that should have been done a long time ago to minimize conflicts between competing (and sometimes incompatible) uses and represents what multiple use management ought to be. The trick, of course, is that delineation of the areas is fair to all and management is enforced.	The SRMA boundaries and management are based on guidance in appendix C of the BLM land use planning handbook (H-1601-1). SRMAs are areas that require a recreation investment, where more intensive recreation management is needed, and where recreation is a principal management objective. These areas often have high levels of recreation activity or are valuable natural resources.
Recreation	Western Watersheds Project, Inc.	Recreation management actions within Chapter 2 pg 2-80, should change requirements of a 200' buffer in riparian areas as stipulation for recreation SRPs to require 330 in accordance with UT Riparian Policy and Utah Guidelines for Recreation Activities.	The riparian limitation for camping associated with SRPs (200 feet) is less than the surface disturbance restriction for riparian areas (330 feet) because camping is a less intrusive activity than physically altering or removing the soil and vegetation, exposing the mineral soil to erosive processes (see Glossary definition

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			of surface disturbance). In addition, the standard camping recommendations for camping from Tread Lightly is to camp 200 feet away from streams and lakes.
Recreation	Western Wildlife Conservancy	We categorically reject the philosophically unsophisticated idea enthroned in the federal bureaucracy that all values reduce to the varied preferences of human beings. To the contrary, we maintain that both biotic and a-biotic nature possess irreducible intrinsic value. In our view that human beings (including especially the employees of the Bureau of Land Management) have a moral duty to recognize and protect these values while giving proper weight to instrumental values, such as accessible mineral deposits, and various recreational values. Among these latter, those types of recreation that are most conducive to appreciation of the intrinsic values of the land, wildlife and cultural resources, which are typically least destructive to these resources and least obnoxious to quiet recreationists, ought to be accorded the highest priority. Note: This excludes ATV, ORV and OHV recreation. In our opinion, the Kanab RMP, especially under the “preferred” alternative, gives far too much weight to mineral exploration, livestock grazing and motorized recreation at the expense of intrinsic values and the experiences of quiet recreationists. It’s as if a fine acoustic guitar were given to a tribe of people who could conceive of no better use for it than firewood.	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation.
Recreation	William Hughes	First, the Hog Canyon SRMA needs to have language added that would allow for possible expansion of the road system in the future. This is a tool that might be valuable in the future.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system in the future.
Recreation	William Hughes	Second, an SRMA should be added for the John R. Flat area per the suggestion of Kane County officials.	Much of the John R. Flat area is covered by the Kanab Community SRMA.
Riparian	ECOS Consulting	The riparian "330 foot" buffer proposed within this Kanab DRMP/DEIS is woefully inadequate to prevent widespread riparian long-term, direct, indirect and cumulative impacts.	Not allowing surface disturbing activities within 330 feet of riparian/wetland areas is the Utah BLM policy outlined in IM-UT-2005-091. The Draft RMP/EIS also evaluated not allowing surface disturbing activities within 660 feet of riparian/wetland areas and analyzed the impacts from this decision.
Riparian	ECOS Consulting	For these reasons, and many more, the BLM must establish an effective buffer zone that protects the less than 1% of the Kanab Decision Area that riparian habitat encompasses. When there is nearby surface disturbance, the proposed BLM buffer of "100 meters" is inadequate in this dry desert environment, because ofthe ease of the spread of soil disturbance and erosion, vegetation loss, and soil and water contamination that can spread into the floodplain and riparian habitat.	Not allowing surface disturbing activities within 330 feet of riparian/wetland areas is the Utah BLM policy outlined in IM-UT-2005-091. The Draft RMP/EIS also evaluated not allowing surface disturbing activities within 660 feet of riparian/wetland areas and analyzed the impacts from this decision.
Riparian	ECOS Consulting	The DRMP/EIS fails to provide enough information to adequately assess the direct, indirect, and cumulative impacts of OHV use in the riparian areas within the Kanab Decision Area. In particular, the DRMP/EIS fails to identify what specific riparian areas will be affected, how much of the total percentage of riparian areas and floodplains will contain OHV routes in the different alternatives, or what specific riparian areas will be "Closed."	The impact analysis used the best available information and methodology to determine the impacts to riparian areas associated with the Draft RMP/EIS. As stated in Appendix K, impacts to riparian areas were considered in identifying routes and will continue to be a criteria in identifying routes. In addition, monitoring riparian conditions, as needed, for surface uses that could affect riparian area health and functionality would ensure appropriate actions could be taken to protect these areas before functioning condition becomes impaired.
Riparian	ECOS Consulting	It is recommended that the DRMP fully disclose what riparian areas will have	The impact analysis used the best available information and methodology to

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		OHV routes in/near them. Specifically, each riparian area should be listed as either open or closed to OHV use, with "open" being those riparian areas that have an OHV route within the riparian area and/or floodplain. The DRMP/EIS should also disclose each of the routes clearly, and address how they will be maintained. The DRMP/EIS should also address future relocation and closure due to deteriorating riparian conditions and deteriorating route conditions due to continuous wear and tear and storm events.	determine the impacts to riparian areas associated with the Draft RMP/EIS. As stated in Appendix K, impacts to riparian areas were considered in identifying routes and will continue to be a criteria in identifying routes. In addition, monitoring riparian conditions, as needed, for surface uses that could affect riparian area health and functionality would ensure appropriate actions could be taken to protect these areas before functioning condition becomes impaired.
Riparian	ECOS Consulting	Thus, the BLM must manage the small percentage ofriparian habitat that is in the Kanab DRMP project area, less than 1% of the total area, for the maximum benefit of renewable resources, and for the ecological benefit of surrounding areas.	Page 2-38 of the Draft RMP/EIS includes management alternatives for riparian areas.
Riparian	ECOS Consulting	These potential impacts are not addressed adequately in this Kanab DRMP/DEIS; this is especially relevant considering the increase in mining and oil and gas exploration applications and future plans of the industry.	Riparian management alternatives minimize impacts to riparian/wetland areas by not allowing surface disturbing activities, including oil and gas activities and developments, within 330 feet of riparian/wetland areas. Additionally, applying best management practices (Appendix A of the Draft RMP/EIS) to surface disturbances near riparian/wetland areas would further minimize impacts.
Riparian	Mark Sterkel	As for unique, rare, threatened riparian areas, the DRMP does not provide for management to protect them. Utah is the 2nd dryest state, so should not our vulnerable streams, wetlands, and riparian areas be treasured & protected? Why continue to ignore proper management and let them be overgrazed, and trashed by OHV's?	Not allowing surface disturbing activities within 330 feet of riparian/wetland areas is the Utah BLM policy outlined in IM-UT-2005-091. The Draft RMP/EIS also evaluated not allowing surface disturbing activities within 660 feet of riparian/wetland areas and analyzed the impacts from this decision.
Riparian	Norman McKee	2 – 8: In management actions, is there consideration to include the use of beaver for riparian management?	Beaver are not specifically precluded from use of beaver in riparian areas. The Draft RMP/EIS Chapter 2 (page 2-53) includes language that allows the "introduction, translocation, transplantation, restocking, augmentation, and re-establishment of native and naturalized fish and wildlife species in cooperation and collaboration with UDWR..."
Riparian	Norman McKee	2 – 9: To remove all exotic plants would also include Russian Olive trees. This is a tree that is an important winter food source for several wildlife species, notably wild turkeys. Please reconsider the proposal to removal all Russian Olive trees in occupied or potential turkey habitat.	The Draft RMP/EIS on does not specifically propose to remove all Russian olive trees, but the BLM is required, by law (Draft RMP/EIS page 3-27) to control noxious weeds, and Chapter 2 includes a decision to "implement noxious weed and invasive species control actions as per national guidance and local weed management plans in cooperation with state and federal agencies, affected counties..."
Riparian	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-38, Section 2.4.1: Management of Riparian Areas (first row): Does the BLM have a list of "small" or "isolated" riparian areas that are considered suitable for divestiture? If so, it may be appropriate to list those under consideration in the document. Riparian areas, even ones that are small and/or isolated, are important for many species of Utah wildlife. Divestiture of these features should not result in their loss or degredation or result in the degradation of water quality within and downstream of the riparian areas.	The wording in the Proposed RMP/Final EIS has been revised for clarification.
Riparian	U.S. Fish and Wildlife Service, Utah Field	Page 2-38, Section 2.4.1: Management of Riparian Areas (3rd row): "As opportunities arise…" This statement implies that recovery and rehabilitation	The first sentence of the row in question specifically states that the BLM will "prioritize rehabilitation efforts and management adjustments." The commenter

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	Office	would not be considered a priority, and only occur as opportunities arise. Consider providing a stronger standard and commitment in the RMP toward restoration of riparian communities, particularly because of their high value to wildlife species throughout the State.	misunderstands the following sentence, which applies to instances where the BLM would work with other parties to for recovery and rehabilitation, such as working with the holders of water rights. The BLM cannot force outside parties into "cooperative proposals."
Riparian	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-39, Section 2.4.1, 2nd row: Reword as, "Do not allow new surface disturbing activities within a minimum buffer of 330 feet…" Protection of wildlife species, particularly during nesting or breeding seasons may require a larger spatial buffer than 330 feet. Similar wording should be added to all alternatives, and throughout the document.	Language described by the commenter would be contrary to the Utah Riparian Policy (IM-UT-2005-091). The buffer zones are not the only protection available for riparian zones. Mitigations for each riparian area would be developed on a case-by-case basis to best meet the conditions at the point of impact to implement the policies and procedures of the riparian program and other resources and land uses.
Riparian	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-40, Section 2.4.1: Management of Riparian Areas (last row): Remove the wording "to the extent possible" from the commitment to maintain sufficient water at springs. Many wildlife species rely heavily on spring habitats, and these features should always be retained.	The language in the Draft RMP/EIS is adequate, as maintaining sufficient water is often outside the BLM's ability to control given that State of Utah is responsible for adjudicating water rights.
Riparian	Western Watersheds Project, Inc.	Indeed the entire riparian discussion and definitions need clarification with respect to riparian and/or wetland resources.	The information in Table 3-9 shows the existing condition and trend of the inventoried decision area's riparian/wetland areas. While the entire Kanab Field Office has not been inventoried for riparian/wetland areas the best available data was used. CEQ regulations implementing the National Environmental Policy Act (NEPA) require agencies evaluating effects on the human environment in an environmental impact statement (EIS) to identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 CFR 1502.22). As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available.
Riparian	Western Watersheds Project, Inc.	Proper data is available through current technology regarding geographic information systems digital imagery, data sources such as the National Hydrographic Dataset (NHD) and US Geologic Survey (USGS) water resources data, as well as site-specific field assessments for Standards of Rangeland Health and Riparian Databases.	The information in Table 3-9 shows the existing condition and trend of the inventoried decision area's riparian/wetland areas. While the entire Kanab Field Office has not been inventoried for riparian/wetland areas the best available data was used. CEQ regulations implementing the National Environmental Policy Act (NEPA) require agencies evaluating effects on the human environment in an environmental impact statement (EIS) to identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 CFR 1502.22). As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available.
Riparian	Western Watersheds Project, Inc.	The DEIS/RMP needs to demonstrate through proper analysis that riparian/wetland resources and other sensitive values including dependent wildlife species habitats, are adequately identified and protected from proposed resource uses and impacts.	The Draft RMP/EIS utilized the best available data for dependent wildlife species. The 2006 habitat datasets from the Utah Division of Wildlife Resources were utilized for planning and analysis of impacts in each of the alternatives. The same datasets were also used to development management alternatives to protect crucial habitats. Additionally, best management practices (Appendix A and Appendix B of the Draft RMP/EIS) include land management techniques determined to be the most effective and practical means of minimizing conflicts and negative environmental impacts from management actions.
Riparian	Western Watersheds	Additionally, clarification needs to be provided that all riparian/wetland resources	BLM recognizes these requirements and applied these protections in the Draft

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	Project, Inc.	(both lotic and lentic systems) are protected by the Executive Order (EO) 11990 (wetland protection), EO 11988 (floodplain management), and Section 404 of the Clean Water Act.	RMP/EIS. The Utah Riparian Policy (IM-UT-2005-091) provides specific guidance to Utah BLM riparian lands while support all BLM national guidance directives.
Riparian	Western Watersheds Project, Inc.	Where is BLM's analysis showing the relationship of livestock and OHV activities to water pollution, stream damage and loss of aquatic habitat in ALL livestock or motorized accessible areas?	The impacts to riparian/wetland areas from livestock grazing and OHV use are analyzed in section 4.2.4 of Chapter 4 of the Draft RMP/EIS.
Riparian	Western Watersheds Project, Inc.	Despite an improper capability and suitability analysis, the DEIS failed to quantify and analze the impacts of livestock grazing within riparian/wetland areas which are critical and sensitive ecosystems within the western landscape.	The impacts to riparian/wetland areas from livestock grazing and OHV use are analyzed in section 4.2.4 of Chapter 4 of the Draft RMP/EIS.
Riparian	Western Watersheds Project, Inc.	Claims of streams and riparian areas in PFC ignore that PFC is a minimal classification that does not address the wildlife habitat attributes of these most important areas, water quality or instream habitat for fish. In addition, springs, seeps and wetlands condition and trend are not described.	Proper Functioning Condition is the BLM standard for assessing lotic and lentic riparian areas. The Standards and Guidelines for Rangeland Health and the Fundamentals for Rangeland Health establish conditions to be achieved on BLM lands.
Scope of Document	Bill May	In addition, I believe That the BLM should recognize the RS2477 road claims that are part of Kane and Garfield Counties Transportation Plans ...	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Bruce Bunting Kane County Conservation District UACD	Do not attempt to close roads that are part of the counties transportion plans or RS-2477 roads that are being claimed by the counties. There would be less conflict with these road areas if these routes were determined before attempts made later to close these important rights of way. The district does not believe the BLM has this kind of authority to over ride RS-2477 roads to begin with.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Capital Trail Vehical Association	We request that this planning project include adequate research ofthe county records and adequate formal consultation and coordination with the county to get their input on RS 2477 routes.	The Proposed RMP/Final EIS will not address RS 2477 ROW assertions. Such assertions will be settled administratively on a case-by-case basis or as confirmed through other legal means. See Draft RMP/EIS chapter 2 page 2-26 and chapter 3 page 3-83.
Scope of Document	Don Black Canyon Country 4x4 Club	We also consider it a mistake to attempt to close roads that are part of the Counties Transportation Plans or RS2477 roads that are being claimed by the Counties. Less conflict would arise by having the validity of these route determined before any attempt was made to close any of these roads.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Don Black Canyon Country 4x4 Club	Due to popularity, improved equipment and technological advancements, we need to update and get prepared for future use. Attached is a list of people who have also acknowledged the need for these improvements. We ask that you consider this proposal and retain it in your records. We look forward to working with you regarding the following: 1) The Hog Canyon OHV area should be treated as a separate entity from the RMP due to its complexity and previous determination. 2) The Trail Patrol functions and activities should be better coordinated with land managers. 3) Have an unbiased member of land management to work with the motorized community on day to day issues. 4) All actions taken for the betterment of the system be a mutual effort between land	The recommendations the commentor raises are outside the scope of the Kanab RMP. The recommendations could be considered during site-specific implementation-level planning.

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		managers and users. 5) A trail be developed to the North to better access the states existing trail systems. 6) Trails on attached map be considered to make this a more adequate and complete trail system.	
Scope of Document	Don Black U4WDA	We also consider it a mistake to attempt to close roads that are part of the Counties Transportation Plans or RS2477 roads that are being claimed by the Counties. Less conflict would arise by having the validity of these route determined before any attempt was made to close any of these roads. We also feel that not having existing roads on the maps as part of the RMP process does not give us the opportunity to make meaningful comments on the roads shown on the maps as part of Alternate B.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Duane Smith	The roads that run to, through and around Rock Canyon Spur, Poverty Flat Road, Virgin River Access, Hell Dive, Ed Lamb Point Rd. Verillion Routt, Willis Canyon, Black Mesa quilify under RS2477 as road that should remain open to public acess of all types.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	ECOS Consulting	Where monitoring programs have been developed and used, the BLM must write summary and trend reports so that management and the public can make determinations on the effectiveness of the management of allowed activities.	There is no legal or regulatory requirement to provide monitoring data. This request is outside the scope of the document.
Scope of Document	ECOS Consulting	In particular, we would like to see Wildlife Management Plans for mountain lions, bobcats, bears, foxes, and coyotes that include habitat improvements and the protection of areas large enough to support viable populations of these predators.	Wildlife management is the responsibility of the State of Utah Division of Wildlife Resources. As described in the BLM's planning handbook (BLM-1601-1), the BLM is responsible for managing wildlife habitat, working in close coordination with state wildlife agencies who develop wildlife management plans for these species.
Scope of Document	ECOS Consulting	Besides population numbers, this DRMP lacks overall goals and objectives for the management of fish and wildlife for the next 10-20 years. It also lacks what the basic wildlife needs are and how the BLM plans to meet any objectives.	Wildlife management is the responsibility of the State of Utah Division of Wildlife Resources. As described in the BLM's planning handbook (BLM-1601-1), the BLM is responsible for managing wildlife habitat, working in close coordination with state wildlife agencies who develop wildlife management plans for these species.
Scope of Document	ECOS Consulting	By all measures, the loss of wildlife habitat in this area would be devastating, immediate, and very long-term. What wildlife use this habitat? Are there any populations that would be significantly impacted by these activities? This must be thoroughly discussed in this section.	The document currently states what the commentor notes. The paragraph in question notes that "wildlife habitat…could be lost…on and adjacent to 3,600 acres." It also notes that while restoration will begin within 3 years of initial disturbance, "sagebrush communities that are disturbed/removed take 20–100 years to reestablish." The logical conclusion of these statements is that habitat for wildlife would be lost to some degree over the life of the plan. Because the RFD for coal does not identify exactly where the one anticipated coal mine will be located, it is not possible to analyze exactly which species will be impacted by the mine. The site-specific NEPA document prepared for the coal mine will analyze impacts of this nature.
Scope of Document	Frank and Kaye Alleman	Closing of roads that have RS2477 rights. We don't think you have the authority to do this.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Geno Ramsey	I believe that the BLM should recognize the RS2477 road claims that are part of	The RMP does not adjudicate, analyze, or otherwise determine the validity of the

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	Canyon Country 4x4	Kane and Garfield Counties Transportation Plans. The validity ofthese claims should be determined before a final decision is made in the RMP.	claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Illegible Illegible	Alternative B is preferred with reservations. I do not feel the BLM has the authority to implement changes to RS 2477 roads let alone any public roads and needs good reasons to close any roads whether established or not.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Jacalyn & Charles Liebfried	Any and all RS 2477 roads must remain open. Litigation over these roads is paid for by the taxpayers for both sides of the issue. Avail yourselves to Kane County's pre 1976 aerial maps.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Jack Johnston U4WDA	Was RS2477 considered when closing Sheep Springs Road and Kanab Creek Road as I know these roads are man made & maintained.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	James Bulkeley	I have reviewed the plans and noticed the following major flaw. The plan is flaw because it does not include the Grand Staircase-Escalante National Monument (GSENM) (1,900,000-acre). An adjacent land mass the size of the GSENM should be included in any regional plan. All of the proposed alternative failed to address a balance of recreational values and opportunities.	The decision area does not include the Grand Staircase-Escalante National Monument (see page 1-3 of the Draft RMP/EIS). Management of the Grand Staircase-Escalante National Monument is governed by a separate land use plan. The cumulative impacts section in Chapter 4 of the Draft RMP/EIS describes cumulative impacts of the management of adjacent lands in combination with the decisions in the Kanab RMP.
Scope of Document	Joan Thacher	I request that any transportation plan have a sufficient strategy for enforcement.	Law enforcement is outside the scope of the Kanab RMP. Allocation of law enforcement presence is an Administrative Action by the BLM and does not require a specific planning decision to implement.
Scope of Document	Josh Heaton	Also I would like to voice a concern about the coal mine going in up in Alton. And since I live up there I really don't want it to go in. Because the trucks that will be hauling it out, will constantly be driving threw the town.	The approval of a lease for the proposed Alton coal mine is beyond the scope of the Kanab RMP. This coal mine is being addressed in a site-specific EIS.
Scope of Document	Land Use Volunteers of Kane County	The Kanab BLM needs to complete projections of future OHV use in our area for the next 20 years, then include these projections in their land use planning . What resources will be impacted by greatly increasing numbers of OHVers over time, and which of these resources need to be protected by prudent transportation route planning?	The current use and projected trend of OHV recreation was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.
Scope of Document	Land Use Volunteers of Kane County	This projection of future OHV travel and impacts on our public land needs to be completed and included in the planning process before approving a Resource Management Plan that will last for 20 years.	The current use and projected trend of OHV recreation was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.
Scope of Document	Land Use Volunteers of Kane County	Because this geographic area has been inventoried by the BLM to contain wilderness characteristics, a more extensive inventory of resources should be completed before approval of an RMP Travel Plan. The current BLM inventory is inadequate and does not include or accurately map the distribution of many of the archeological, botanical, wildlife, cultural, and ecological resources present in	While the entire Kanab Field Office has not been inventoried for cultural, wildlife, etc. the best available data was used. As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available.

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		the area that may be impacted by ORV's. This extensive inventory needs to be completed before the final version of an RMP is approved.	The route identification process is flexible and adaptable to adding or removing routes from the transportation system. Appendix K of the Draft RMP/EIS outlines the criteria and process. Future implementation level decisions could address route/trail identification for both motorized and non-motorized uses as explained in Appendix K.
Scope of Document	Land Use Volunteers of Kane County	The current BLM inventory of Moquith Mountain WSA is inadequate and does not include or accurately map the distribution of many of the archeological, botanical, wildlife, cultural, and ecological resources present in the area that have already been impacted by ORV's. This extensive inventory needs to be completed before the final version of an RMP is approved.	While the entire Kanab Field Office has not been inventoried for cultural, wildlife, etc. the best available data was used. As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available. The route identification process is flexible and adaptable to adding or removing routes from the transportation system. Appendix K of the Draft RMP/EIS outlines the criteria and process. Future implementation level decisions could address route/trail identification for both motorized and non-motorized uses as explained in Appendix K.
Scope of Document	Land Use Volunteers of Kane County	The current BLM inventory of Parunuweap WSA is inadequate and does not include or accurately map the distribution of many of the archeological, botanical , wildlife, cultural, and ecological resources present in the area that have already been impacted by ORV's. This extensive inventory needs to be completed before the final version of an RMP is approved.	While the entire Kanab Field Office has not been inventoried for cultural, wildlife, etc. the best available data was used. As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available. The route identification process is flexible and adaptable to adding or removing routes from the transportation system. Appendix K of the Draft RMP/EIS outlines the criteria and process. Future implementation level decisions could address route/trail identification for both motorized and non-motorized uses as explained in Appendix K.
Scope of Document	Laura Welp	Although this part of the trail is not on BLM land, the BLM is obviously part of the larger road system that is required to take OHVs from Kanab to the Hog Canyon Trailhead.	This route is open to OHV use for recreation access.
Scope of Document	Laura Welp	A monitoring plan should be described in detail in the RMP. If impacts are identified, how will they be mitigated?	Appendix K describes how the travel plan will be monitored and adjusted over time based on changing resource conditions and user demands.
Scope of Document	Mark Sterkel	40 million tons of coal from a mine near Alton, over the next 20 years, raises serious questions that may be within the scope of the RMP. For the I, 430 acres of public land (nearly 2 1/2 sq. miles) that would be strip mined, a seperate E.I.S. seems in order how many haul trucks per day through Kanab, Panguitch, or Cedar City? Every 5 minutes, 24 hrs/day, for the next 20 years? Will the drivers slow down for, or even see our children? Will the drivers be on meth or crack? How many highway wrecks will be caused by the frantic rush hours to and from Alton, from Kanab, Cedar, Escalante, Kingston, or Burrville? Will the housing & services for all those workers change our quality of life? What about crime, air pollution, crowded govt offices & jails, our teenage daughters? BLM should study a slower approach, before we end up with traffic lights in Hatch & Orderville.	The approval of a lease for the proposed Alton coal mine is beyond the scope of the Kanab RMP. This coal mine is being addressed in a site-specific EIS.

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Scope of Document	Marlin Sharp Lone Peak 4 Wheelers	In addition, I believe that the BLM should recognize the RS2477 road claims that are part of Kane and Garfield Counties Transportation Plans. The validity of these claims should be determined before a final decision is made in this RMP. I believe Kane and Garfield counties should be consulted regarding all road decisions prior to decision.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Michelle Young	Alternative B is preferred with reservations. I do not feel the BLM has the authority to implement closures to RS 2477 roads. And needs good reasons to close any roads whether established or not.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Monte Chamberlin Canyon Country Rural Alliance	Under the proposal water rights are being threatened-rights which are already threatened under wild and scenic designation, wilderness characteristics management, watershed protection provisions, etc.	There is no effect on water rights or in-stream flows related to suitability findings made in a land use plan decision, barring Congressional action. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no affect on existing, valid water rights.
Scope of Document	Robert Aiken	The road to Moquith Mountain and the road to Hells Dive Canyon. Are RS 2477 roads and should be open for the public to use.	The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS. The Proposed RMP/EIS has been adjusted to open the route to Hell Dive to allow access for development of a public-use cultural site. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Robert Aiken	On the South side of the Virgin River, you are proposing to close the Rock Creek accesses road. This road has been in existence for over 30 years, and is considered a RS2477 road claimed by Kane County.	The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	Sam Hamp Utah 4x4 Club	first off I would like to say that I believe the following roads to be established roads and as such are covered under RS2477: Rock Canyon Spur on the map "The Barracks", The Poverty Flat Road on map "The Barraks," Virgin River Access Rd on map "The Barraks," Hell Drive on map "Moquith Mountain", Ed Lamb Point Rd on map "Moquith Mountain", Vermillion Route on map "Thomson Point", Willis Canyon on map "Thomson Point" and Black Mesa Routes on mapo "Black Mesa.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Scope of Document	SUWA	Vast tracks of BLM lands were arbitrarily and/or capriciously omitted from WSA designation for various reasons not in keeping with FLPMA's mandate. These	The BLM does not have the authority to designate new WSAs under the land use planning process.

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		errors and omissions made it impossible for the BLM to fully account or the extent of the wilderness resource during its FLPMA mandated wilderness inventories.	The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs.
Scope of Document	SUWA	We are deeply troubled that BLM, by condoning trespass and impairment to our public wild lands, is taking the extreme position that the federal government will tolerate damage to our public lands and that those who damage our public lands can do so without fear that BLM will enforce the law. Such a position is contrary to law and BLM policy and must be reversed.	Law enforcement is outside the scope of the Kanab RMP. Allocation of law enforcement presence is an Administrative Action by the BLM and does not require a specific planning decision to implement.
Scope of Document	SUWA	Recommendation: We strongly urge BLM to take immediate action to enforce the law and remove the illegal Kane County road signs from the wilderness study areas and other public lands (this would also apply to any Garfield County signs if that county posts such signs). In addition, the RMP should state that BLM shall immediately remove all signs that conflict with BLM's travel management decisions.	Law enforcement is outside the scope of the Kanab RMP. Allocation of law enforcement presence is an Administrative Action by the BLM and does not require a specific planning decision to implement.
Scope of Document	SUWA	The BLM should adopt the approach to management set out in IM ID-2008-016, including creating a baseline of conditions in the WSAs, setting out a detailed monitoring program, incorporating standards for determining if use of these ways is impairing wilderness values, and committing to take measures to end any such impairment immediately, including through closure and restoration of ways.	The IM cited by the commentor applies to management of BLM-administered lands in Idaho and not Utah. Adoption of this IM is outside the scope of the Kanab RMP.
Scope of Document	Tracy Hiscock	Adequately fund resource protection and law enforcement programs. The agency already fails to control ORV use in Wilderness Study Areas or wilderness quality	Law enforcement is outside the scope of the Kanab RMP. Allocation of law enforcement presence is an Administrative Action by the BLM and does not

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		lands.	require a specific planning decision to implement.
Scope of Document	Tracy Hiscock	By adequately planning the ORV designated routes to avoid environmentally sensitive areas, • By improperly allowing construction of ORV staging areas, signs and routes without following federal rules imposed by the National Environmental Policy Act (NEPA), and • By failing to designate any areas as closed to ORV use and, consequently, primarily for hiking or equestrian use. This ignores a huge population of public land users to accommodate a smaller group of ORV users.	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation. BLM is identifying the motorized travel network in the RMP, however this is an implementation-level decision. Trails for non-motorized use (e.g., equestrian, hiking) will be identified in future activity-level planning.
Scope of Document	Utah Archeological Research Institute	It would be appropriate for the BLM as part of this management plan to formally commit to getting all of the eligible archaeological sites in the KFO area listed on the NRHP. Therefore, we formally request that you please do exactly that. The Cottonwood Canyon drainage would be a good place to start.	The BLM integrates the protection of resource values such as cultural resources with its responsibilities for land use planning and resource management under FLPMA to ensure that the affects of any activity or undertaking is taken into account. In addition, National Programmatic Agreement, which regulates BLM's compliance with National Historic Preservation Act, serves as the procedural basis for BLM managers to meet their responsibilities under Section 106, and 110. Until 1980, Section 106 of the NHPA required agencies to consider the effects of their undertakings only on properties listed on the National Register of Historic Places. However in 1980, Section 106 was amended to require agencies to consider an undertaking's effects on properties included in or eligible for inclusion in the National Register. Since that time the BLM, through its land use planning process, outlines specific management prescriptions and mitigation measures to protect sites both listed and eligible for the National Register. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. The Draft RMP/EIS Cultural Resource Decisions (page 2-56) outline which areas would receive priority for proactive Section 110 inventories. Proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the Field Office.
Scope of Document	Utah Archeological Research Institute	Regarding section 1.4 on page 1-15 under Planning Criteria, there is no discussion about archaeological resources (field inventories, identification, protection). Should not the existence of archaeological resources play a significant role in these plans? See page 2-21 through 2-22, Objectives under Cultural Resources.	The planning criteria do not need to mention every resource that will be considered in the planning process. As noted in the Draft RMP/EIS section 1.4, "planning criteria are the constraints or ground rules that guide and direct the devleopment of the RMP..." Cultural resources generally, and specifically the issues raised by the commentor, are addressed by criteria bullets #7 (use of current resource information, which would include cultural field inventories), #12 (identification of sites areas and objects important to Native American Tribes), and #16 (management actions will be reponsive to issues, which as noted on page 1-7 of the Draft RMP/EIS and the Kanab Scoping Report include a variety of cultural issues). Cultural resource data and the potential for cultural sites was considered throughout the management decisions in chapter 2 and analysis in chapter 4.
Scope of Document	Western Watersheds Project, Inc.	The RMP/EIS has failed to take a hard look at the issue of livestock grazing, instead, putting off decisions to some uncertain time in the future, while impacts,	Evaluation and adjustment of grazing management practices (e.g., stocking rates, season of use, changes in livestock kind) for individual or groups of allotments is

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		which are massive across the Resource Area, continue. BLM has not provided for enforceable permit terms and conditions.	beyond the scope of this RMP and will be addressed at the implementation stage. Determining the condition of the range and its ecological functional status during the grazing permit renewal process is standard protocol. All reasonably available monitoring data is analyzed to make any necessary management changes to provide for the sustained yield and responsible use of the public lands prior to the permit renewal. Kanab Field Office will monitor range condition and adjust grazing management practices for specific allotments to meet the Standards for Rangeland Health as noted in 43 CFR 4180. Likewise, grazing permit terms and conditions are not in the scope of this NEPA document. Congress has required that all permits have NEPA documentation prior to the end of Fiscal Year 2009.
Scope of Document	Western Watersheds Project, Inc.	The Draft RMP/EIS failed to analyze the role and values of predators in controlling rodent populations and fulfilling their role in a healthy ecosystem.	The role and values of predators in controlling rodent populations is outside the scope of the Draft RMP/EIS.
Socioeconomics	Capital Trail Vehical Association	Additionally, we request that the cumulative negative impact resulting from inadequate evaluation of economic and social impacts in past actions are considered in the analysis and decision-making and that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.	The impact analysis used the best available information and methodology to determine the economic and social impacts associated with the Draft RMP/EIS. The Draft RMP/EIS chapter 4 section 4.5.1 describes the process used for economic and social impact analysis, as well as the various inputs used in the analysis. Performing an analysis that includes the costs of delays, court fees, and forgone opportunities is outside of the scope of this document, as is compensating for past cumulative negative impacts.
Socioeconomics	Melanie Boone-Reznick	In reviewing the Kanab Resource Management Plan, there is a lack of recognition of the intrinsic values that the resources of the area provide to the local social and economic welfare of the surrounding communities.	The commentor is referring to non-market values. These non-market values are not available to the BLM. The studies of which the BLM is aware are based on designated wilderness, the results of which may or may not be generalized to other “wild lands”. Even if the studies are generalizable to Wilderness Study Areas (WSAs), the impacts are irrelevant, since WSA management is outside the scope of the current planning effort. The BLM is unaware of any evidence that such studies are generalizable to non-WSA lands with wilderness characteristics FLPMA Section 202, (c) (4)states: “In the development and revision of land use plans, the Secretary shall…rely, to the extent it is available (emphasis added), on the inventory of the public lands, their resources, and other values.” The BLM does recognize the potential importance of non-market values relative to managing for wilderness characteristics.
Socioeconomics	SUWA	The range of alternatives analyzed in the RMP Draft EIS is insufficient. There's almost no variability among the four alternatives presented, in terms of the proportion of the planning area being open for both motorized recreation and for oil and gas development. The so-called protective alternative is the only one with a notable difference and even this alternative opens the majority of the planning area for oil and gas drilling and off-road motorized recreation.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential

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			alternatives identified.
Socioeconomics	SUWA	Recommendations: The BLM must measure and account for changes in non-market values associated with the level of off-road motorized recreation, oil and gas drilling and other development proposed in this RMP. To do otherwise omits a very important socioeconomic impact that is the direct result of management actions. The BLM must assess the non-market economic impacts on the owners of the lands in the Kanab Field Office - all Americans. This analysis must include the passive use values of undeveloped lands such as the lands with wilderness characteristics.	The non-market values to which the commentor refers are not available to the BLM. The studies of which the BLM is aware are based on designated wilderness, the results of which may or may not be generalized to other "wild lands". Even if the studies are generalizable to Wilderness Study Areas (WSAs), the impacts are irrelevant, since WSA management is outside the scope of the current planning effort. The BLM is unaware of any evidence that such studies are generalizable to non-WSA lands with wilderness characteristics FLPMA Section 202, (c) (4)states: "In the development and revision of land use plans, the Secretary shall…rely, to the extent it is available (emphasis added), on the inventory of the public lands, their resources, and other values." The BLM does recognize the potential importance of non-market values relative to managing for wilderness characteristics.
Socioeconomics	SUWA	Recommendations: The BLM must collect and analyze actual data on the economic impacts of the alternatives, including Alternative E. Some suggested analyses and sources of data can be found in "Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy" (attached).	The commentor offers no specifics as to what "actual" data BLM failed to use, nor does the commentor provide any detail as to where BLM erred in its analysis. The commentor suggests that BLM should rely on the data sources and methodologies outlined in Socio-Economic Framework for Public Land Management Planning, published by the Wilderness Society. Most of the data sources described in this publication were used by BLM, especially in Chapter 3. The Economic Profile System (EPS), developed by the Sonoran Institute for the BLM, aggregates many of the federal data sources in The Wilderness Society's publication. Similarly, BLM incorporated the same Utah state government data sources as are included in The Society's document. The Wilderness Society is an advocacy group, and their recommendations are understandably focused towards their specific goals and objectives. BLM, on the other hand, must take a broader view under its multiple-use, sustained yield mandate.
Socioeconomics	SUWA	Recommendation: The BLM must collect accurate data on actual recreation use of the Kanab Field Office, including data on the impacts (environmental, social and economic) of recreation use. Until an accurate assessment of actual use and impacts can be made the BLM should err on the side of caution and restrict off-road motorized use.	The commentor offers no specifics as to what "actual" data BLM failed to use, nor does the commentor provide any detail as to where BLM erred in its analysis. The Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also

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			a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. An adequate range of alternatives for transportation and OHV recreation were analyzed in the Draft RMP/EIS.
Socioeconomics	SUWA	Recommendations: BLM must develop recreation management directives which reflect the proportional use of the area by non-motorized and/or non-OHV users. BLM must collect and analyze more thorough and accurate data on the costs of off-road motorized recreation in order to make an accurate assessment of the impacts of the alternatives. BLM must recognize that increasing off-road motorized recreation implies the need for increased restrictions, and increased law enforcement, not opening more land for open cross-country travel.	The comment does not provide references to documentation or other evidence to support this assertion. The Draft RMP/EIS does evaluate the socioeconomic impacts of recreational use for various activities, including off-road motorized vehicles. A discussion of this analysis is provided in section 4.5, Impacts To The Social and Economic Environment.
Socioeconomics	SUWA	The use of IMPLAN is insufficient to predict future economic impacts from the management of the Kanab Field Office lands. While the IMPLAN model can be useful as a tool to develop static analyses of the regional economy, the agency and local communities must be aware of the shortcomings and poor track record of the model as a predictive tool. IMPLAN models do not consider the impacts of many important variables that affect regional growth in many rural communities, especially in the West. Attributes such as natural amenities, high quality hunting, fishing and recreational opportunities, open space, scenic beauty, clean air and clean water, a sense of community, and overall high quality of life are not measured or accounted for in IMPLAN models, however these amenities are associated with attracting new migrants as well as retaining long-time residents. Many residents of Western communities (both longtime and new) earn retirement and investment income, and while it is technically possible, most IMPLAN models completely fail to consider the important economic role of retirement and investment income.	IMPLAN is a regional economic impact model that provides a mathematical accounting of the flow of dollars and commodities through a region's economy. The model was used to develop the economic impact analysis in section 4.5 of the Draft RMP/EIS. The economic impact analysis in Chapter 4 of the Draft RMP/EIS was complimented by an analysis of social impacts that addresses the social attributes the commentor cites.
Socioeconomics	SUWA	Recommendations: The BLM must collect and analyze credible data on all sectors of the economy, especially investment and retirement income and recreation (including nonmotorized recreation). These sectors, along with the various sectors which depend indirectly on the protection of public lands from motorized recreation and development must then be included in a quantitative assessment of the impacts of land management decisions.	The commentor’s premise is that the action alternatives will produce degradation to public lands to such an extent as to dissuade individuals (specifically retirees) from relocating to, or staying in, the Kanab planning area. The commentor's assertion that the BLM’s action alternatives will result in such degradation is unsupported by any specific information. The commentor’s assertion that retirees are likely to relocate from the Kanab planning area is completely unsupported by any data or evidence. The BLM agrees that some retirees could be attracted to areas with natural amenities, but maintains that its planning decisions will not reduce such amenities, but should actually preserve and enhance them.

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			The BLM is unaware of any methodology which reliably projects non-labor income and its components in a specific area over a 20 year period, let alone any method which could predict changes in these components likely to result from the BLM's action alternatives.
Socioeconomics	Utah Archeological Research Institute	Additionally, we see no evidence of a cost analysis associated with each alternative. If you or we are to choose an alternative, is not the cost an important factor? We would like to see an estimate of the costs of implementing each alternative	The CEQ Guidelines for Implementation of the Procedural Provisions of the NEPA does not require preparation of a cost-benefit analysis for all EISs. The regulations state that "If (emphasis added) a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences (40 CFR 1502.23 Cost-benefit analysis). FLPMA requires that BLM manage the public lands for Multiple Use. Section 103(c) of FLPMA defines Multiple Use as follows: "The term 'multiple use' means . . . harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." Additionally, given that the implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and funding, etc., there is no way to meaningfully evaluate costs and benefits of the alternatives. Therefore, a cost-benefit analysis is not central to the planning effort and is not required for consideration of multiple-use planning alternatives. After selection of an alternative to establish multiple use, costs and benefits of management actions may be considered, depending on priorities and funding. The BLM's National Planning Handbook (H1601-1) notes that even during implementation of land use plans "there is no requirement to develop a cost/benefit analysis, but management actions that have a high likelihood of improving resource conditions for relatively small expenditures of time and money should receive relatively higher priority (BM H-1601, IV. E. Developing Strategies to Facilitate Implementation of Land Use Plans).
Soil Resources	ECOS Consulting	The destruction of biological soil crusts is a "long-term" impact. The loss of biological soil crusts has long-term indirect and cumulative effects on soil stability and moisture, on the amount of vegetation, vegetation type, vegetation health and vigor, and is directly responsible for the loss of many important ecological functions within the ecosystem.	Chapter 3, section 3.2.3. of the Draft RMP/EIS includes a description of biological soil crusts and their importance in the decision area. As stated on page 3-11 of the Draft RMP/EIS: "Total crust cover is usually inversely related to vascular plant cover, as less plant cover results in more surface available for colonization and growth of crustal organisms." Rangeland health assessments in the Kanab Field Office have generally shown high levels of plant cover occur. The commentor's assumption that 90 percent of exposed soils within the Kanab Field Office is covered by biological soil crust is incorrect. As stated on page 3-12 of the Draft

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			RMP/EIS: “The BLM’s standard for assessing the conditions of public lands involves the use of ecological sites and woodland community descriptions developed for specific soil survey areas in accordance with standards established and developed by the Natural Resource Conservation Service (NRCS), U.S. Department of Agriculture (USDA). These ecological site descriptions generally do not contain specific information about the quantities of cryptobiotic crusts that are expected to be on the site.” While there has not been a systematic inventory of soil crusts within the decision area, small areas of more dense soil crusts do exist, especially in areas with less dense vegetative cover. The BLM ID Team, using their professional judgment, has determined that the amount of biological crusts present in functional and healthy ecological sites are adequate to support ecological processes in conjunction with the vascular plants present. The Draft RMP/EIS management alternatives address the functioning and ecological condition of a site rather than for biological crusts alone. The alternatives are designed to maintain or improve rangeland health. Functioning rangelands in healthy condition tend to maintain biological soil crusts at an appropriate level and distribution. The impacts to biological soil crusts at the landscape levels are addressed in Chapter 4 of the Draft RMP/EIS commensurate to the level of decision making in the Draft RMP/EIS. Site-specific impacts to biological soil crusts would be covered in implementation level NEPA analysis (e.g., term permit renewals, special recreation permits, realty actions, tenure adjustments).
Soil Resources	ECOS Consulting	The BLM Kanab Field Office must classify biological soil crusts as a "sensitive and fragile soil." BSCs are classified as such in the Moab Field Office.	Fragile soils were defined in the Draft RMP/EIS Glossary to be limited to those soils that are most fragile and that do not recover well from surface disturbance, even with management assistance. Biological soil crusts are considered to be a flora cover type in their own right, and not one of the physical soil horizons. Removal of any vegetation cover will affect erosion potential, as described the Draft RMP/EIS chapter 4, therefore vegetation cover type is not included in the definition of fragile soils. The amounts, condition, and distribution of biological soil crusts in the Kanab Field Office are significantly less than the Moab Field Office. Therefore, biological soil crusts are not treated in the same manner in the Kanab Draft RMP/EIS as in the Moab document.
Soil Resources	ECOS Consulting	Given the scientific literature on the ecological importance of BSC's, how can this component not be part of the evaluation? Without this component included, the results of these evaluations cannot be seriously considered as an effective indication of the health of the land.	Chapter 3, section 3.2.3. of the Draft RMP/EIS includes a description of biological soil crusts and their importance in the decision area. As stated on page 3-11 of the Draft RMP/EIS: “Total crust cover is usually inversely related to vascular plant cover, as less plant cover results in more surface available for colonization and growth of crustal organisms.” Rangeland health assessments in the Kanab Field Office have generally shown high levels of plant cover occur. The commentor’s assumption that 90 percent of exposed soils within the Kanab Field Office is covered by biological soil crust is incorrect. As stated on page 3-12 of the Draft RMP/EIS: “The BLM’s standard for assessing the conditions of public lands involves the use of ecological sites and woodland community descriptions developed for specific soil survey areas in accordance with standards established

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Soil Resources	ECOS Consulting	It is recommended that the Kanab Field Office classify BSC's as sensitive soils and limit surface disturbance wherever they are present, and wherever they have historically occurred.	Fragile soils were defined in the Draft RMP/EIS Glossary to be limited to those soils that are most fragile and that do not recover well from surface disturbance, even with management assistance. Biological soil crusts are considered to be a flora cover type in their own right, and not one of the physical soil horizons. Removal of any vegetation cover will affect erosion potential, as described the Draft RMP/EIS chapter 4, therefore vegetation cover type is not included in the definition of fragile soils. The amounts, condition, and distribution of biological soil crusts in the Kanab Field Office are significantly less than the Moab Field Office. Therefore, biological soil crusts are not treated in the same manner in the Kanab Draft RMP/EIS as in the Moab document.
Soil Resources	ECOS Consulting	Because of the widespread occurrence of biological soil crusts in the Decision Area, it is essential that the BLM include the protection of these fragile and sensitive biological soil crusts as a fundamental part oftheir land management, and as a top priority in their best management practices (BMP's).	Chapter 3, section 3.2.3. of the Draft RMP/EIS includes a description of biological soil crusts and their importance in the decision area. As stated on page 3-11 of the Draft RMP/EIS: "Total crust cover is usually inversely related to vascular plant cover, as less plant cover results in more surface available for colonization and growth of crustal organisms." Rangeland health assessments in the Kanab Field Office have generally shown high levels of plant cover occur. The commentor's assumption that 90 percent of exposed soils within the Kanab Field Office is covered by biological soil crust is incorrect. As stated on page 3-12 of the Draft RMP/EIS: "The BLM's standard for assessing the conditions of public lands involves the use of ecological sites and woodland community descriptions developed for specific soil survey areas in accordance with standards established and developed by the Natural Resource Conservation Service (NRCS), U.S. Department of Agriculture (USDA). These ecological site descriptions generally do not contain specific information about the quantities of cryptobiotic crusts that are

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Soil Resources	ECOS Consulting	Page 4-24, 2nd Paragraph: This statement is wrong. The short-term use of soil resources will definitely affect long-term productivity of the biological soil crusts and the vegetation that depends on it for water retention and vital minerals. Reclaiming disturbed areas, as outlined in the BMP's in Appendix A, will not be nearly as effective in this dry desert environment. Especially on soils that contain biological soil crusts, which is about 89% of the Decision Area.	Application of BMPs will not affect long-term productivity of soils in the semi-arid and montane climates present in the decision area.
Soil Resources	ECOS Consulting	In particular, the BLM must update, develop, and maintain strict protocols or Best Management Practices (BMP's) that are designed to minimize damage to biological soil crusts, vegetation, water, and riparian resources during extractive industry activities.	Appendix A of the Draft RMP/EIS includes a list of best management practices (BMPs) designed to maximize beneficial results and minimize conflicts and negative environmental impacts from management actions.
Soil Resources	ECOS Consulting	Boilogical soil crusts are a significant part of a majority of vegetation types in the Kanab Decision Area. Desert Scrub, Sagebrush Steppe, and Pinyon-Juniper Woodland encompass approximately 90% of the Kanab Decision Area. This is why the protection, restoration, and, enhancement of the biological soil crust is so important.	Chapter 3, section 3.2.3. of the Draft RMP/EIS includes a description of biological soil crusts and their importance in the decision area. As stated on page 3-11 of the Draft RMP/EIS: "Total crust cover is usually inversely related to vascular plant cover, as less plant cover results in more surface available for colonization and growth of crustal organisms." Rangeland health assessments in the Kanab Field Office have generally shown high levels of plant cover occur. The commentor's assumption that 90 percent of exposed soils within the Kanab Field Office is covered by biological soil crust is incorrect. As stated on page 3-12 of the Draft RMP/EIS: "The BLM's standard for assessing the conditions of public lands involves the use of ecological sites and woodland community descriptions developed for specific soil survey areas in accordance with standards established and developed by the Natural Resource Conservation Service (NRCS), U.S. Department of Agriculture (USDA). These ecological site descriptions generally do not contain specific information about the quantities of cryptobiotic crusts that are expected to be on the site." While there has not been a systematic inventory of soil crusts within the decision area, small areas of more dense soil crusts do exist, especially in areas with less dense vegetative cover. The BLM ID Team, using

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			their professional judgment, has determined that the amount of biological crusts present in functional and healthy ecological sites are adequate to support ecological processes in conjunction with the vascular plants present. The Draft RMP/EIS management alternatives address the functioning and ecological condition of a site rather than for biological crusts alone. The alternatives are designed to maintain or improve rangeland health. Functioning rangelands in healthy condition tend to maintain biological soil crusts at an appropriate level and distribution. The impacts to biological soil crusts at the landscape levels are addressed in Chapter 4 of the Draft RMP/EIS commensurate to the level of decision making in the Draft RMP/EIS. Site-specific impacts to biological soil crusts would be covered in implementation level NEPA analysis (e.g., term permit renewals, special recreation permits, realty actions, tenure adjustments).
Soil Resources	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-20, Section 4.2.2: In the Recreation (outside OHV use section), 1st sentence: replace "could result in soil compaction" with "would result in soil compaction." Simlarly, in the second sentence, replace "could" with "would." Check the entire document for similar terminology changes.	The use of these terminologies was reviewed by the BLM ID team throughout the writing of the impact analysis process. Current language was determined adequate.
Soil Resources	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-20, Section 4.2.2: The RMP states: "Motorized activities in SRMAs could increase use on routes, which could indirectly protect nearby soils…" However, Alternative B indicates that the Dunes RMZ would be open use for OHV, rather than restricted to routes. Please provide more support of the reasoning behind this statement.	The Draft RMP/EIS language has been modified for clarity.
Soil Resources	U.S. Geological Survey	Impacts on Soil Resources, pages 4-16 - 4-24 There are numerous references to soils. It would benefit the public if the final RMP/EIS identified the soils datasets that were used in the assessment.	The soil data used is found in section 3.2.3. of the Draft RMP/EIS. In addition, the BLM used site write-up area descriptions based on BLM resource staff knowledge for areas not covered by an existing soil survey.
Soil Resources	Western Watersheds Project, Inc.	The definition of sensitive or fragile soils must be expanded to include those soils with moderately high to high soil erosion potential from wind or water, soils with potential for biological crusts, soils on steeper slopes and soils where ground cover is below potential.	Fragile soils were defined in the Draft RMP/EIS Glossary to be limited to those soils that are most fragile and that do not recover well from surface disturbance, even with management assistance. Biological soil crusts are considered to be a flora cover type in their own right, and not one of the physical soil horizons. Removal of any vegetation cover will affect erosion potential, as described the Draft RMP/EIS chapter 4, therefore vegetation cover type is not included in the definition of fragile soils. The amounts, condition, and distribution of biological soil crusts in the Kanab Field Office are significantly less than the Moab Field Office. Therefore, biological soil crusts are not treated in the same manner in the Kanab Draft RMP/EIS as in the Moab document.
Special Status Species	Laura Welp	Welsh's milkweed The RMP does not address the best available data showing a potential conflict between motorized damage to plants and reduction in reproductive output.	The BLM has utilized the best available data in analyzing impacts to Welsh's milkweed from OHV use. The commenter did not provide any additional data that BLM could consider in the Final EIS/Proposed Plan.
Special Status Species	Laura Welp	To sum up, this policy would have a negative effect on rare plant surveys and appears to be politically motivated. It should be removed from the draft.	BLM included the language "BLM approved botanist" to ensure a qualified botanist with understanding of BLM policy and procedures conducts rare plant surveys.
Special Status	Merlin Esplin	Page 2-13 Welsh's Milkweed: BLM desires to close motorized use in and through	The 790 acre figure is identified in the Draft RMP/EIS Section 2.2 (Management

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Species		islands of vegetation in designated critical habitat for Welsh's milkweed. The Coral Pink Sand Dunes State Park already provides education and administration in this regard, and a sizable portion of the dunes is already off limits to motorized activity. Is the 790 acres proposed for closure in addition to the area already closed? If so, current data and ongoing research does not support this action. Reports clearly show that Welsh's milkweed needs disturbance for survival. Closing the dunes creates two concerns; first, the dunes become vegetated more quickly - thus crowding out the milkweed faster, and second, it displaces OHV's to other areas where greater damage may occur to vegetation, soil, water, wildlife, livestock, and recreation. Any decision to alter the current management of the dunes may be met by unintended consequences.	Common to All Alternatives) and is currently closed to OHV use by the 2000 Vermilion MFP amendment and would be applied under all the proposed alternatives. As stated above, no mangement actions are proposed in the alternatives that would change the management of the 790 acre conservation area.
Special Status Species	SUWA	The Kanab draft RMP fails to address these threats adequately, therefore violating Endangered Species Act. requirements that federal agencies must avoid jeopardizing and promote conservation of listed species.	The proposed plan provides the necessary protection to listed species. The management prescriptions including committed conservation measures and lease notices have already undergone a section 7 consultation process with FWS. Prior to implementing the proposed plan, additional section 7 consultation will be completed and any additional conservation measures developed by FWS will also be included as committed measures in the plan. Finally, BLM will conduct the necessary section 7 consultation with FWS on individual, specific actions.
Special Status Species	SUWA	The draft RMP fails to provide adequate protection for suitable Utah prairie dog habitat (both unoccupied and occupied) by failing to curtail land uses deleterious to prairie dogs and their habitat. The primary land uses at issue are livestock grazing, oil and gas drilling and exploration, and OHV use.	The current management prescriptions described in Chapter 2, including conservation measures and lease notices, were developed in coordination with FWS. Section 7 consultation with FWS on these prescriptions has occurred in the past and it was determined that implementation of these measures would provide the necessary protection for the Utah prairie dog. Livestock grazing will be managed according to the Standards for Rangeland Health, which includes management for "desired species, including native, threatened, endangered, and special-status species" (Standard #3). The Utah Prairie Dog Recovery Plan is currently (2008) being revised by the Utah Prairie Dog Recovery Team and USFWS. As noted in the Draft RMP/EIS Chapter 2 (page 2-10), the BLM will "Implement Recovery Plan, Conservation Agreement, and Strategy decisions to increase populations and improve habitat of special status species, including federally listed species, by enhancing, protecting, and restoring occupied and potential habitat."
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-10, Section 2.2.1, 3rd bullet: "...in managing listed species and their habitat." Add "sensitive species" or "special status species" to this sentence.	The Proposed RMP/Final EIS has been modified to include this change.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-10, Section 2.2.1: Management Actions, Special Status Species Conservation and Habitat Enhancement, last line: Rewrite to read, "Apply lease notices and conservation measures to activities occurring in special status species habitat."	The Proposed RMP/Final EIS has been modified for clarity.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field	Page 2-10 through 2-14 and Appendix M, Section 2.2.1, Special Status Species: Conservation measures included for the threatened, endangered, and candidate	The Chapter 2 management actions sections referred to by the commentor have been revised to reduce duplication and conflicting management actions with the

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	Office	species should be the same as those included in the June 19, 2007 Biological Opinion for the Existing Utah BLM Resource Management Plans. It appears that Appendix M includes the correct measures. However, the wording on pp. 2-10 through 2-14 is sometimes inconsistent with Appendix M, and not as complete. This makes the document confusing upon initial reading. Recommend including either all of Appendix M up front in Chapter 2, or referring to Appendix M without attempting to include partial measures in Chapter 2.	Conservation Measures in Appendix M.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-10 and 3-30, Section 2.2.1, Bald Eagles: The bald eagle has been delisted. However, eagles are still provided protection under the MBTA and Bald and Golden Eagle Act. We recommend moving the eagle discussion to the Fish and Wildlife or Migratory Bird section of the document. To ensure continued species conservation, we also recommend a commitment to the conservation measures agreed to in the aforementioned June 2007 biological opinion.	The Proposed RMP/Final EIS has been modified for clarity.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-11, Section 2.2.1, Bald Eagles: The document states that monitoring will occur in order to document the impacts to bald eagles in their breeding or wintering areas. The RMP should also clearly commit to avoiding or minimizing impacts that monitoring detects.	Management actions to address impacts identified during monitoring would be developed during the implementation level to best address the site-specific conditions. The Draft RMP/EIS, Chapter 3 (page 3-29) notes "Protective measures for migratory birds are provided in accordance with the Migratory Bird Treaty Act of 1918 and the Bald Eagle Protection Act of 1940."
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-11, Section 2.2.1, Bald Eagles: The "Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances" recommends a 1.0 mile buffer around bald eagle nests between January 1 and August 31. Although a 0.5 mile buffer may be appropriate for temporary activities at other times of the year, the 1.0 mile buffer should be used for permanent surface disturbances and during the bald eagle nesting season.	The Chapter 2 management actions sections referred to by the commentor have been revised to reduce duplication and conflicting management actions with the Conservation Measures in Appendix M.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Pge 2-11, Section 2.2.1, Utah Prairie Dog: The 1st sentence should require species occupancy and distribution information that is complete, available, and current. This is how it is stated in Appendix M, but needs to be written correctly in the document as well. All of Appendix M measures needed to be completely integrated into the document.	The Chapter 2 management actions sections referred to by the commentor have been revised to reduce duplication and conflicting management actions with the Conservation Measures in Appendix M.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-13, Section 2.2.1: A comprehensive and ongoing monitoring program is a critical element in determining the status and conservation needs for the Siler pincushion cactus. We recommend establishing monitoring plots to assist with successful species management.	Identification of monitoring methodologies is not a land use plan decision, and is outside the scope of this RMP/EIS.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-13. Section 2.2.1: In an effort to conserve and recover Welsh's milkweed, we recommend establishment of a designated conservation area for Welsh's milkweed on BLM lands. Consideration should be given to managing portions of the Coral Pink Sand Dunes as a SRMA and other portions as an ACEC with applicable recreational use closures to protect the species habitat from motorized use. Management should consider the shifting nature of the sand dunes and ensure that the designation of a protected area is large enough or adaptive to changing habitat conditions.	An ACEC is not required to close an area to OHV use. The Proposed RMP closes OHV use in approximately 790 acres of designated critical habitat for the Welsh's milkweed. Additionally, the vegetated portions of the dunes are closed to OHV use. The decisions regarding management of the Welsh's milkweed as described in the 2000 Vermilion Management Framework Plan Amendment are carried forward into the proposed plan. FWS was heavily involved in the development of this management. Section 7 consultation on the amendment and FWS concurred with the BLM management decisions regarding the milkweed.

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Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-13, Section 2.2.1: Monitoring for the past 10 years has shown that populations of the CPSD tiger beetle are in decline. Drought has probably been a primary factor in this decline. The RMP should clearly state that BLM will cooperate and facilitate recommendations from the CPSD tiger beetle Conservation Agreement technical team for ongoing monitoring, research, and conservation measures for this species. The 370 acre conservation area should continue to be monitored; adaptive management strategies may be appropriate given the shifting nature of the sand dunes.	The Conservation Agreement and Strategy are specifically mentioned in the Draft RMP/EIS in Chapter 1 (page 1-18) and in Chapter 2 (page 2-13).
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-15, Section 2.2.1, 1st paragraph: We recommend including the USFWS Raptor Guidelines as a Management Action in addition to the BLM BMPs.	The Draft RMP/EIS specifies that raptors are to be managed in accordance with the BMPs included in Appendix B. These BMP's implement the Utah Field Office Guidelines For Raptor Protection From Human and Land Use Disturbances (USFWS 2002) and provide for modifications of spatial or temporal raptor nest buffers, if an established set of criteria can be met. The document specifies that the BMPs, or specific elements of the BMPs, which pertain to the proposal, should be attached as Conditions of Approval to all BLM use authorizations that have the potential to adversely affect nesting raptors, or would cause occupied nest sites to become unsuitable for nesting in subsequent years. Therefore, the raptor BMPs can be applied to any surface disturbing action, including energy development activities, where raptor nesting may be affected. As specified in the U.S. Fish and Wildlife Service "Guidelines" document, modifications of spatial and seasonal buffers for BLM-authorized actions would be permitted, so long as protection of nesting raptors is ensured. State and/or Federally-listed, proposed, and candidate raptor species, as well as BLM State-sensitive raptor species, should be afforded the highest level of protection through this BMP process; however, all raptor species would continue to receive protection under the Migratory Bird Treaty Act. Modification of the buffers for threatened or endangered species would be considered pending results of Section 7 Consultation with U. S. Fish and Wildlife Service.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-15, Section 2.2.1, Wildland Fire Ecology: There should be an objective that includes protection and enhancement of threatened and endangered species and their habitats.	Protection of threatened and endangered species from wildfire suppression efforts and wildland fire ecology management actions were addressed in the 2005 FONSI/DR for the Utah Land Use Plan Amendment for Fire and Fuels Management and associated Section 7 consultation with the USFWS. The resource protection measures developed during that consultation effort are contained in the Draft RMP/EIS Appendix L, and referenced in Chapter 2 (page 2-21).
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-17, Table 2-1: Sagebrush: Areas with more than 30% sagebrush cover are described as "dense sagebrush" and are to be treated with fire and/or mechanical or chemical methods to reduce the canopy cover. Consideration should be given to species that desire greater densities of sagebrush cover and to maintaining a diversity of habitats. As such, some areas should have more than 30% sagebrush cover.	The Draft RMP/EIS contains resource protection measures developed for the 2005 FONSI/DR for the Utah Land Use Plan Amendment for Fire and Fuels Management and associated Section 7 consultation with the USFWS. These resource protection measures address applicable fire management practices in sagebrush habitats. Additionally, all proposed treatments would receive NEPA documentation prior to implementation.
Special Status	U.S. Fish and Wildlife	Page 2-44, Section 2.4.1: The Sand Hills located North of Kanab and East of	The language on page 2-47 of the Draft RMP/EIS addressing management of

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Species	Service, Utah Field Office	highway 89 is designated as critical habitat for Welsh's milkweed. Restrictive protections, including OHV management, should be considered for this area, in order to prevent adverse modification of the critical habitat. It is difficult to determine from the RMP if such protections are established in Alternative B.	Federally Listed and Candidate Plants was modified to specifically address the Welsh's milkweed designated critical habitat. OHV use is limited to identified routes in the Sand Hills portion of critical habitat in the Sand Hills area under Alternatives B, C, or D. This will limit impacts to areas that have already been impacted by the presence of routes.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-44, Section 2.4.1, Special Status Species (1st row): "...a case-by-case basis…" We recommend evaluating surface disturbing on a landscape level (not only case-by-case project activities) to ensure the development and implementation of successful, long-term conservation and recovery strategies for special status species.	The RMP makes landscape level decisions and therefore, its analysis is completed to address landscape level impacts. However, the site of every project for the life of the plan (20 years) is not known, therefore the specific impacts to special status species is impossible to determine. This level of analysis is supported by the Ninth Circuit Court ruling in Northern Alaska Environmental v. Kempthorne (No. 05-35085 D.C. No. CV-04-00006-J-JKS, July 26, 2006).
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-44, Section 2.4.1, Special Status Species Conservation and Habitat Enhancement (3rd row): For listed species, compensation of 1:1 for lost habitat is likely to be insufficient in most cases. Compensation would usually be greater than 1:1 due in part to the fact that the result would be a net habitat loss to the species even with mitigation.	The Proposed RMP has been revised to include the following management action: "The BLM will approach compensatory mitigation on an “as appropriate” basis where it can be performed onsite, and on a voluntary basis where it is performed offsite, or, in accordance with current guidance."
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-45, Section 2.4.1, Special Status Species Conservation and Habitat Enhancement (third row): For bald eagle nests, we recommend the seasonal 1.0 mile buffer be implemented in accordance with the U.S. Fish and Wildlife Service (Service) Raptor Guidelines and the June 2007 Biological Opinion for the Existing Utah BLM Resource Management Plans. The seasonal buffers for the other raptor species are appropriate for temporary surface disturbing activities. Permanent disturbances, particularly those that ensue human activities, should be precluded year-round within the spatial buffers.	The Draft RMP/EIS includes a 1 mile buffer from January 1 to August 31 on page 2-10.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-47, Section 2.4.1, Last Row (Federally Listed and Candidate Plants): Please define the term "moderate constraints." BLM should recognize the potential that closed or NSO stipulations may be appropriate or necessary in special status plant species habitats. Alternative B should alow for major constraints (NSO) in special status plant habitat.	Appendix C in the Proposed RMP/Final EIS has been modified to include the examples of surface stipulations, and what levels of leasing constraints each stipulation is associated with, as described in the BLM's planning handbook (BLM-H-1601-1).
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-49, Section 2.4.1, Special Status Species and Fish and Wildlife Management Action sections: See Attachment 1 to this spreadsheet (FWS Species-Specific Recommendations for Use in BLM RMP Plannin Efforts, May 2003). Although these were prepared for the Price, Richfield, and Vernal Field Office areas, many of the recommendations are applicable to the Kanab Field Office area. We recommend incorporating applicable guidelines (particularly those for "All Species" into Alternative B, as the Preferred Alternative. Incorporation of these measures will also help to strengthen the management direction for migratory birds.	The Draft RMP/EIS already incorporates most of the recommendations included in the commenter's recommendations. Several of the recommendations in the 2003 document have been superseded by more recent recommendations. Many of the recommendations are also contained in conservation measures developed by the USFWS and the BLM and incorporated into the Draft RMP/EIS in Appendices B and M. Finally, several of the recommendations are not land use plan level decisions.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-100, Section 2.4.1: Please check the acreage for Welsh's milkweed, Coral Pink Sand Dunes critical habitat throughout the document. Number stated on p. 2-13 is 790 acres. All of Coral Pink Sand Dunes is critical habitat for	Most of the designated critical habitat for the Welsh's milkweed is located on the Coral Pink Sand Dunes State Park, and therefore not subject to the decisions in the RMP. The language and acres (including the sand hills) describing the

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		Welsh's milkweed. OHV use in sand dunes open to cross country use is indicated as 1,100 acres on page 2-111. A rough, but not accurate, estimate of Coral Pink Sand Dunes acreage outside of the state park is 1,280 acres. In addition, critical habitat for Welsh's milkweed includes the acreage encompassing the Sand Hills areas. Jointly both areas are indicated to contain 4,000 acres on page 3-34. Also, please indicated critical habitat acreage involved in Moquith Mountain SRMA, in particular Dunes RMZ p. 2-71.	Welsh's milkweed critical habitat has been adjusted in the Proposed RMP to clarify the relationship with other land owners.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-32, Section 3.2.6: Translocation of Utah prairie dogs should be listed as a specific management activity. The translocation program is mentioned on p. 3-33, but it's authorization under the RMP is not clearly stated. Additionally, "control of plague vectors" needs to be included as an authorized UPD activity in this plan. These two management activities for UPDs (translocation and control of plague vectors) should be documented in all sections related to the species.	The Draft RMP/EIS specifically mentions prairie dog translocations in Chapter 2 on page 2-46. Additionally, Chapter 2 allows for the treatment of the plague on page 2-47.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 3-33, Section 3.2.6: The Coral Pink Sand Dunes tiger beetle (Cicindela albissima) has been determined to be a full species, not a subspecies of the tiger beetle Cicindela limbata (Morgan Knisley and Vogler 2000).	The Draft RMP/EIS has been modified to reflect the new taxonomic status.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 3-34, Section 3.2.6: The RMP states that the 2000 Vermilion Management Framework Plan amendment addresses management and protection of the Welsh's milkweed. Pleae clarify what conservation measures are included in this current RMP revision, and retained in the preferred alternative.	All decisions from the 2000 Vermilion MFP amendment were reviewed during this RMP revision. All the decisions were brought forward into the Draft RMP/EIS and are described in Chapter 2.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 3-34, Section 3.2.6: Please update the document to include the most current available information. The area described in 2000 by Hreha and Meyer is no longer considered the most viable of all known populations. This population comprised less than 10 individuals in 2007, a loss of more than 90% of previously known population levels. A monitoring program should be renewed at this past thriving population to determine if seedling recruitment still occurs, and if measures should be implemented to recover the population.	The Draft RMP/EIS has been modified to include the most recent monitoring data.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 3-34, Section 3.2.6: Please update the document with the most recent best available information. Monitoring in 2003 is not the most recent monitoring, nor is a comparison of stems between 2002 and 2003 (i.e., 2 years), a good indication of trend. Data collected by BLM should also include statistical verification for long-term trends.	The BLM has use the best available scientific information in developing the alternatives and analysis in the Draft RMP/EIS including studies on Welsh's Milkweed through 2005.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 3-34, Section 3.2.6: Please provide a brief summary regarding Welsh's milkweed populations in Arizona.	The Arizona populations of Welsh's milkweed are outside the scope of this NEPA document.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 3-39, Section 3.2.6: Recent evidence indicates that the southern leatherside chub (Lepidomeda aliciae), the species in the Kanab FO area, is one of two taxa formerly known as leatherside chub (Snyderichthys copei) and qualifies as a unique species (Johnson and Jordan 2000, Dowling et al. 2002, Belk et al. 2005, Johnson et al. 2004).	The Draft RMP/EIS has been modified to reflect the new taxonomic status.

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Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 3-39, Section 3.2.6:Other populations of Bonneville cutthroat trout exist within the KFO area. Refer to the Conservation Agreement for additional populations of introduced, reintroduced and core populations in the Southern Bonneville GMU: Upper Sevier, East Fork Sevier, and Upper Virgin HUC.	Upon reviewing the Conservation Agreement and Strategy for Bonneville Cutthroat Trout in the State of Utah, the only habitat on BLM managed lands is in Three-Mile Creek. Other populations exist within the Kanab planning area, but on not on lands administered by the BLM.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 3-84, Section 3.3.4: The document indicates that OHV use is resulting in impacts to resources at the Sand Hills and Coral Pink Sand Dunes areas. We therfore recommend that the RMP allow for the development and implementation of adaptive management strategies, including potential OHV use restrictions, in sensitive wildlife and plant habitats. Open use on all parts of these areas seems contra-indicated, as resources are already at risk.	As noted in the Draft RMP/EIS Chapter 3 (page 3-84), the management in the 2000 Vermilion MFP amendment addressed impacts from increasing use and is carried forward in the Proposed RMP. Also noted on page 3-84 is that many of the problems in the Sand Hills area is from being managed as open to cross-country OHV use. None of the action alternatives retain this management. By limiting OHV use to identified routes, sensitive wildlife and plant habitats will be protected, as described in Chapter 4.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-3, Table 4-2: The table does not include the Migratory Bird Treaty Act or EO 13186; these should be added to the table.	Migratory birds found in the planning area are listed in Table 3-14 on page 3-39 - 3-50 of the Draft RMP/EIS. Migratory birds are not identified by the BLM NEPA Handbook (BLM-H-1790) as a critical element of the human environment.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-49 through 4-58, Section 4.2.5: Effects throughout the section are described generally, without relating to individual species. The exception appears to be the consistent reference and discussion for the Greater sage-grouse. It seems inconsistent that other special status species are not discussed more fully in the same manner that the Greater sage-grouse is discussed. Please provide full descriptions of effects to all special status species; use of species subheadings would assist readibility of the document.	A Resource Management Plan contains decisions and analysis at a landscape level; subsequent NEPA analysis at the site-specific/project level must be completed prior to implementation. Additionally, the CEQ NEPA regulations direct that scoping be used to determine the scope and the significant issues to be analyzed in depth in the environmental impact statement, and to identify and eliminate from detailed study the issues which are not significant… (40 CFR 1501.7). During the scoping process for the Kanab RMP, special status species were raised as an issue generally, although the Greater sage-grouse was specifically identified as a species to address. Therefore, the Draft RMP/EIS addressed it to a greater degree than other special status species.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-49, Section 4.2.5: This section should reference tables 3-12 (page 3-30), 3-13 (page 3-34, and 3-14 [migratory birds], which identify "species needing special conservation actions" (page 3-48)). Referencing these tables and the species within would provide readers with a consistent point of reference.	The purpose of Chapter 3 in a NEPA document is to present the existing condition of the various resources and uses to be addressed. This presentation sets the context for the analysis of alternatives in Chapter 4. To refer back to the special status species section of Chapter 3 in the special status species section in Chapter 4 is duplicative, as such a relationship inherently exists within an EIS, as described in CEQs NEPA regulations in 40 CFR 1500. Additionally, while some migratory bird species are also special status species, not all of them are. Therefore, creating such a connection would be incorrect.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-50, Section 4.2.5, Impacts common to all Alternatives: The entire section is awkward -- it is difficult to discern if all activities/species have been evaluated for each alternative. Habitat alteration, fragmentation and/or loss is discussed relative to fire, ROW developments, and cultural resources, but fails to mention any other potential activity affecting habitat. For example, 48% of all acres would be open to oil and gas development under the preferred alternative, Therefore, it would be appropriate to list oil and gas development as an activity that would cause habitat loss, fragmentation and/or alteration. We recommend reorganizing by using subheadings for activities.	The Draft RMP/EIS Chapter 4 is organized in a manner to reduce needless repetition of impacts from similar activities resulting originating from different resource, use, or designation decisions. Using subheadings to identify impacts of alternative decisions from each resource, use, or designation results in extensive repetition and subsequent un-needed length to an already long document. For example, organization using subheadings for activities overemphasizes the impacts of potentially protective management tools such as VRM, as the protective impacts from managing an ACEC as VRM Class II would be addressed under the ACEC section as well as the VRM section. In the end, it doesn't matter

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			where the protective management originates, but what its effect is on the various resources. The commentors confusion with a lack of discussion of oil and gas impacts under the Common to All Alternatives header is because oil and gas decisions vary to a great degree between alternatives. Impacts resulting from habitat alteration, fragmentation, and/or loss of special status species habitat resulting from potential oil and gas development is analyzed in the draft RMP/EIS on page 4-58.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-51, Section 4.2.5: 2nd paragraph states, "…special status wildlife could seek alternative habitats." This section should also clarify that "alternative habitats" may be unsuitable or already occupied.	The Draft RMP/EIS language has been modified for clarity.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-56, Section 4.2.5, Alternative A: Only OHV use and Veg treatments are mentioned as activities that can cause displacement. There are other activities that should be included in this section -- e.g., grazing, recreation, oil and gas.	The analysis on page 4-56 of the Draft RMP/EIS identifies several actions with the potential to displace special status species including motorized recreation use, dispersed recreation use, oil and gas exploration and development, livestock grazing, vegetation treatments, and any other surface disturbing activity. As defined in the glossary on page G-18, surface disturbance includes oil and gas development and exploration activities.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-57, Section 4.2.5, Alternative B, Habitat Alteration, Fragmentation, and/or Loss: This section appears to only evaluate impacts from OHV, oil & gas, forest/woodland products, and locatable minerals. Impacts to special status species and their habitats should be clearly described for all activities occurring on BLM lands.	This section of the Special Status Species impact analysis for Alternative B describes habitat alteration, fragmentation, and/or loss. The other sections of the impact analysis describe displacement, habitat maintenance, and/or enhancement (pages 4-57 to 4-60). The common to all alternatives impact analysis are described on pages 4-49 to 4-53.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-57, Section 4.2.5, Alternative B, Habitat Alteration, Fragmentation, and/or Loss: The first paragraph states, "Managing OHV use…as limited to 1,387 miles…would minimize surface disturbances to special status species." We generally agree that less off-road use would reduce impacts to habitats. However, the document does not thoroughly evaluate 1) if/what special status species/habitats occur in the areas that will be open to OHV use, and 2) if/what effects will occur to those species/habitats. Please provide a thorough evaluation for each Alternative in Ch. 4.	An analysis of the Alternative management prescriptions on special status species and habitats is contained in Chapter 4.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-58, Section 4.2.5, Alternative B, Habitat Alteration, Fragmentation, and/or Loss: The 4th paragraph states, "…stipulations on disturbance in special status species habitats would decrease the potetnial for the impacts…" While this may be true, the section should also clearly describe the types of impacts that will still occur, e.g. habitat fragmentation.	The impact analysis of oil and gas activities on Special Status Species on page 4-58 refers to the habitat fragmentation impact analysis of Alternative A on pages 4-53 to 4-56 of the Draft RMP/EIS. As stated on page 4-1 of the Draft RMP/EIS, the impact analysis for Alternative A was prepared first to serve as the baseline for the comparison of the alternatives to avoid repetition.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-59, Section 4.2.5, Alternative B, Displacement: "Impacts from dispersed recreation activitiy, mineral exploration and development, and ROW development would be the same as described in alternative A…" The Alternative A, Displacement, section does not include evaluations of these activities. See previous comment to 4.2.5 -- using activity subheadings would help clarify these sections.	The analysis on page 4-56 of the Draft RMP/EIS includes impacts from activities such as cross-country OHV use, motorized recreation, dispersed recreation and/or surface disturbance activities. As defined in the glossary on page G-18, surface disturbance includes oil and gas development and exploration activities.
Special Status	U.S. Fish and Wildlife	Page 4-70, Section 4.2.6: There is virtually no discussion on the impacts to	The impacts to migratory birds are disclosed in the Special Status Species and

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Species	Service, Utah Field Office	migratory birds from management actions. Activities requiring vegetation removal in particular warrant some discussion. BMPs to reduce impacts to migratory birds, including seasonal buffers and habitat mitigation, should be developed and included in the RMP (see ATTACHMENT 1 recommendations). These may include commitments to develop and implement a standardized rigorous program to collect data on species identified in the BHCAs; and work with UDWR and others to develop a comprehensive monitoring program. Suveys should be completed one breeding season prior to land disturbing activities. Conservation measures should minimize habitat loss/fragmentation, prevent loss of eggs and nestlings, reduce indirect effects (e.g., introduction of noxious weeds), and avoid surface disturbing activities during the passerine breeding season (May 15 - July 15).	Fish and Wildlife Habitat sections in Chapter 4 of the Draft RMP/EIS. In addition, the Draft RMP/EIS already incorporates most of the commenter's recommendations to include conservation measures in Appendices B and M. Finally, several of the recommendations are not land use plan level decisions.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page 4-72, Section 4.2.6, Displacement (third paragraph): Oil on feathers of incubating birds will also kill developing embryos when adults are incubating eggs...it's not just ingestion; pits should be netted and propertly maintained to exclude migratory birds.	The Draft RMP/EIS language has been modified.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page AB-4, Appendix B, Unoccupied Nests (last paragraph): The document states that "empirical evidence would suggest that the 3-year non-use standard has been effective in conserving raptor species." We recommend the Kanab FO retain the seven-year non-use standard for nest protection as stated in the Raptor Guidelines. This seven year standard may be adjusted on a site-specific basis, depending on raptor species and other site-specific factors. The Utah Field Office has produced a white paper, “Elapsed Time between Raptor Nest Uses” (Megown and Romin, 2006) that reviews recent literature and expert knowledge to assess raptor nest reuse frequency. The paper finds that of the 19 raptor species examined regarding nest occupancy, half (10) of them have data that show the elapsed time between nest uses can be 7 or more years. Golden eagles, bald eagles, and peregrine falcons in particular can have especially long periods (i.e. 10-20 years) of nest non-use followed by successful nesting.	The 3-year non-use standard varies from the Guidelines’ suggested 7-year non-use standard before declaring nest abandonment. This variation is based upon a similar standard that has been applied for more than 20 years in two administrative areas within Utah. Empirical evidence would suggest that the 3-year non-use standard has been effective in conserving raptor species. The 3-year standard has been applied without legal challenge or violation of “Take” under the MBTA or the Eagle Protection Act.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page AB-8, Appendix B: The purpose of monitoring active raptor nests is more than simply documenting the impacts of an activity on the behavior and survival of raptors. The purpose of monitoring is to avoid impacts to raptors, particularly "take" of raptors (e.g., survival) which is an unlawful activity under the Migratory Bird Treaty Act. If monitoring detects an impact on bird behavior, especially one that might result in "take" the activity should be suspended or modified so that the impacts are removed.	The paragraph on page AB-8 does not limit monitoring to areas with potential impacts, but recognizes that given limited resources, monitoring should focus on projects that could potentially impact species. In addition, coupling monitoring with applying BMPs and the raptor guidelines would reduce impacts to raptors. Added the following language to Appendix B: "If monitoring detects an impact on bird behavior, especially one that might result in "take" the activity could be suspended or modified so that the impacts are avoided or removed.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page AL-4, Appendix L: "The U.S. Fish and Wildlife Service has completed a biological opinion on the Proposed Action…" This sentence is confusing because formal section 7 consultation has not been initiated for this RMP. In addtion, this entire section seems contradictory with Appendix M. Species-specific conservation measures were developed during section 7 consultation on the existing RMPs (not the RMP revisions). In an effort to streamline section 7	Appendix L of the Draft RMP/EIS includes the resource protection measures from the FONSI and Decision Record Utah Land Use Plan Amendment for Fire and Fuels Management (2005). Page AL-4 refers to the Proposed Action from the FONSI which amended the current land use plans (Alternative A) and is incorporated into the Kanab RMP under all alternatives. Section 7 consultation was completed for the 2005 Amendment and the USFWS prepared a biological

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		consultation on the RMP revisions, we have recommended that BLM incorporate the same conservation measures into the RMP revisions. The Kanab RMP appears to include these conservation measures in Appendix M; therefore Appendix L should be deleted or updated to reflect the correct conservation measures.	opinion. Appendix M includes the conservation measures identified during Section 7 consultation on the existing land use plans (Alternative A). These conservation measures have been applied to all of the alternatives. A separate Section 7 consultation will be conducted on the Proposed Alternative of the Kanab RMP.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page AM-1, Appendix M: Conservation measures should be developed and incorporated for federally listed plant species, including the Welsh's milkweed and Siler pincushion cactus. The Service is available to work with the BLM to develop these conservation measures.	Lease notices for the Siler pincushion cactus and Welsh's milkweed have been developed and are included in Appendix 9 of the Proposed RMP/Final EIS. These measures will be part of the committed mitigation for implementing the RMP.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page AM-12, Appendix ML: Lease Notices should be developed and included for KFO Federally-listed plant species, such as Welsh's milkweed and Siler pincushion cactus. Stipulations for plants have been developed for plant species at the Vernal BLM Field Office (for example, a 100 foot buffer is now required between surface pipelines and plant locations, rather than 10 foot indicated in the past). Attached are the two updated plant lease notices now used by Vernal Field Office (Attachment 2 and 3). The Service is available to work with BLM to develop these lease notices.	The Draft RMP/EIS includes a range of lease stipulations on page 2-47 and 2-48 that would be included on leases within occupied and suitable habitat for Federally listed and candidate plants. There is also a general lease notice for all listed species that would apply to potential leases in habitat for these species. Additional protections would be developed on a case-by-case basis at the implementation level to adjust to site-specific conditions.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Page AM-13, Appendix M: Include the Range-Wide Conservation Agreement and Strategy for Bonneville Cutthroat Trout (Oncorhynchus clarki utah) (2004).	The Bonneville Cutthroat Trout and the Colorado River Cutthroat Trout Conservation Agreements have been added to Appendix M and to the References in the Proposed RMP/FEIS.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Map 2-6: Restrictions on visually obtrusive developments VRM Class I and II is defined as limiting development and protecting special status species (page 4-61). Critical habitat for Welsh's milk-weed at the Sand Hills in Alternative B is VRM Class III. In Alternative C, a VRM Class II is indicated. We recommend implementing a Class I or II designation for all alternatives at Sand Hills, to ensure long-term conservation and recovery of Welsh's milk-weed.	As a multiple use agency, the BLM uses several management tools to manage the variety of natural, cultural, and scenic resources for which it is responsible. The BLM uses VRM Classes to manage scenic resources. While the Draft RMP/EIS describes the impacts to special status species from the VRM management decisions, with Classes I and II providing a degree of protection (as a result of other resource management prescriptions), using VRM Classifications to protect special status species is an incorrect application of the BLM's visual resource management policies.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Map 2-9: It is unclear if the Kanab Community, OHV RMZ encompasses Kanab Creek and, if so, what protections would be established for the stream and riparian area. Nearby upland landscape impacts also could affect these habitats. This reach of Kanab Creek is a historic site for the Kanab ambersnail and provides riparian habitat important for many species. We recommend appropriate buffers be established to protect the stream and riparian corridor from surface-disturbing activities (including OHV use).	The Kanab Draft RMP/EIS includes a land use plan decision to not allow surface disturbing activities within 330 feet of riparian/wetland areas (page 2-39). The Kanab Community OHV RMZ limits OHV use to identified routes, which is not a surface disturbing activity (page G-18 of the Draft RMP/EIS). The impacts from surface uses and disturbances on riparian areas and water resources are disclosed in section 4.2.4, impacts on vegetation, and section 4.2.3, impacts on water resources in the Draft RMP/EIS.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Map 2-13: The Kanab Community, OHV RMZ is located near Sand Hills, which provides habitat for the listed Welsh's milkweed. The document should evaluate the potential for the OHV RMZ open area to influence OHV use in the Sand Hills. We further recommend establishing OHV impact monitoring at Sand HIlls.	As noted in the Draft RMP/EIS (Chapter 3, page 3-24), the management in the 2000 Vermilion MFP Amendment addressed impacts from increasing use and is carried forward in the Proposed RMP. Also noted on page 3-84, is that many of the problems in the Sand Hills are from the area being managed as open to cross-country OHV use. None of the action alternatives retain this management. By limiting OHV use to identified routes, sensitive wildlife and plant habitats will be

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			protected, as described in Chapter 4.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Map 2-13; page 4-57 thru 4-61: Alternative B includes open OHV use in Coral Pink Sand Dunes and limited trail use in the Sand Hills. We recommend BLM evaluate areas that support dense concentrations of Siler pincushion cactus and Welsh's milkweed for effects from OHV use, and consider OHV restrictions or removal in these areas if warranted. The RMP should specifically commit to ongoing monitoring and evaluation of OHV impacts to these species. We further recommend designating a conservation area at Coral Pink Sand Dunes that is closed to off-road vehicle use, in accordance with the Welsh's milweed Recovery Plan.	In Alternative B of the Draft RMP/EIS, the OHV open areas do not include concentrations of or habitat for Siler pincushion cactus (the area with Siler pincusion habitat is limited to designated routes). The impacts to Welsh's milkweed from OHV use are disclosed on pages 4-53 and 4-54. The Welsh's milkweed conservation area B, in the BLM portion of the sand dunes, remains closed to OHV use in the Proposed RMP/Final EIS. This area was designated in consultation with the USFWS. The area is continuing to be monitored to ensure adequate protection of the species.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Maps 2-17, 2-20, 2-24, 2-30: We recommend that Welsh's milkweed critical habitat areas (the Coral Pink Sand Dunes and Sand Hill) and areas occupied by Siler pincushion cactus be designated as no surface occupancy. We recommend these areas be closed to mineral material disposals and have no new rights-of-way.	Welsh's milkweed critical habitat areas (Sand Hill) have been designated as NSO in the Proposed RMP/Final EIS. The Coral Pink Sand Dunes area is closed to oil and gas leasing due to WSA status. Lease notices for Welsh's milkweed and Siler pincusion cactus have been developed with the USFWS and incorporated into Appendix 9 of the Proposed RMP/Final EIS.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Map 2-34: The mineral leasing status is unclear for the areas that support Siler pincushion cactus and Welsh's milk-weed. We recommend that these areas be designated either closed or NSO to provide protection for these species.	Map 3-18 of the Draft RMP/EIS shows existing oil and gas leases in the Kanab Field Office. There are no leases on Siler pincushion cactus and Welsh's milkweed habitat.
Special Status Species	U.S. Fish and Wildlife Service, Utah Field Office	Map 3-4: The map showing "Areas with fragile soils or relict vegetation" should include Welsh's milkweed and Siler pincushion cactus habitats. Please revise accordingly.	The Siler pincushion cactus and Welsh's milkweed habitat does not occur within identified relict vegetation areas as defined in the Draft RMP/EIS Glossary.
Special Status Species	Walter Fertig	Welsh's milkweed: Adoption of the Welsh's milkweed ACEC would help ensure that this Threatened species does not decline further. Unfortunately, its habitat at Coral Pink sand dunes overlaps with much of the area being proposed for cross-country ATV recreation. The closure of 790 acres to ATV use at the extreme north end ofthe dunes is a good start (though this area doesn't cover the largest milkweed populations), but enforcement will remain a significant issue.	The ACEC proposal was evaluated by the BLM ID Team. The ID Team determined that existing management would protect and prevent irreparable damage to the relevant and important values (see Draft RMP/EIS page 4-213). The management decisions contained in the Vermilion MFP Amendment (existing managment) were the subject of extensive coordination and section 7 consultation with FWS. Enforcement of RMP decisions is outside the scope of this NEPA document.
Special Status Species	Walter Fertig	BLM monitoring data and independent research that I've been associated with indicate that the milkweed population is reasonably stable at Coral Pink (with weather-related fluctuations in numbers of stems). Data from the late Brent Palmer and my own team, however, show that flowering and fruit production are being depressed in areas where mature stems are run over. Vehicle damage tends to promote the production of new, vegetative stems (without flowers) through compensatory growth. Unfortunately, damage to flowering stems from vehicles results in the loss of fresh seeds to contribute to the seed bank and spread to new areas. We found flowering and seeding rates to be double inside the Coral Pink sand dunes tiger beetle exclosure compared to areas open to ATV travel in Coral Pink state park and BLM lands. This finding presents a management opportunity for the BLM - use ofa set of 5-10 short-term removable exclosures located over known patches of milkweed. These exclosures would	The BLM has use the best available scientific information in developing the alternatives and analsyis in the Draft RMP/EIS. In the future, additional research could be considered. Additional research or conservation measures, as proposed by the commentor, could be considered at the site-specific planning level, but are outside the scope of the Draft RMP/EIS.

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		remain in place for 2-5 years, giving the plants inside the opportunity to flower and set seed during that time (more than one year would be best to ensure that seed production isn't lost due to drought). After the allotted time, the exclosures would be removed and placed over different milkweed patches. At any given time the same amount of area would be in an exclosure (and the area outside open to recreation use), but the areas protected by exclosure would shift over time to increase the output of seed and allow new patches to develop. Exclosures could be as small as 20 x 20 feet and would need to be adequately marked to reduce impacts from collision.	
Transportation	Barry Clarkson Clarkson Draper & Beckstrom, LLC	The RMP, as drafted, does not address in any way the issue of access for private property owners across the public lands. In fact, Option C of the RMP leaves my client as well as others completely without access to their property.	FLPMA and 43 CFR 2801.2 requires BLM to provide reasonable access to private property owners through granting of a right-of-way.
Transportation	Betsy Shade	ORVs are given far too much in BLM's Alternative B - 1,387 miles of routes (including 101 miles in proposed wilderness areas) and 1,100 acres of "free play" in the Coral Pink Sand Dunes, in Moquith Mountain Wilderness Study Area. There should be no "free play" area in a WSA, and all ORV routes in proposed wilderness areas should be closed and rehabilitated. Lands with wilderness character are too scarce to allow any more damage by ORVs.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system. Issues that the commentor raises were considered in the evaluation (e.g., parallel and duplicative routes, environmental sensitivity, cultural resources, wildlife habitat sensitivity, and current and anticipated visitor use levels). The IMP allows for open OHV use in sand dunes and continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Chapter 4 describes impacts from the presence and use of OHV ways and routes in WSAs and non-WSA lands with wilderness characteristics. The Proposed RMP/Final EIS has been changed to include management of several non-WSA areas with wilderness characteristics for those characteristics. These areas are limited to designated routes in the Proposed RMP/Final EIS.
Transportation	Bob Wallen	During the comment period a Citizens Proposal to designate appropriate dry wash ways as Designated Off Highway Vehicle routes was presented to your planning team. Several conversations on this proposal between your office, Kane County officials as cooperative agency partners and myself indicated the BLM would consider this as a viable proposal for OHV management considerations. I could not find any reference that this Citizens Proposal was or would be considered in the recently released Draft RMP. This is cause for our concern that this request and information was omitted from your RMP planning considerations. Further concern is that by omitting consideration of this citizen proposal for dry wash routes OHV/ATV recreational opportunities have been substantially and negatively impacted.	The proposal the commentor raises was considered in Alternative D of the Draft RMP/EIS (see page 2-82).
Transportation	Bob Wallen	The requested trial(s) are located in an area currently designated as "open" and may have been "user created" within that designation. As a "user created route" this route was not considered in the draft planning. User created routes should still be considered if not created illegally or causing degradation or impairment. I believe these short trails should be considered.	The route the commentor references is already included in the route inventory and is open in the Proposed RMP/Final EIS.
Transportation	Debra Csenge	Restricting the range of motorized vehicles ranks high in importance because of	Appendix K of the Draft RMP/EIS includes a description of the process and

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		the impact inherent in motorized traffic on the environment. It contributes noise, pollution, and physical damage to the eco-system which are considerably greater than that of non-motorized recreation. Secondly, enforcement of restrictions is a difficult enough issue out in these remote and vast lands, given the limited number of enforcers available. Certainly, some people justifiably turn to motorization, and they deserve some routes open to them. But if we create a spiderweb of designated motorized routes, resources will become impaired. The Draft Plan shows that a great deal of study has already been made, of biodiversity, arch sites, geology and habitat. These things deserve protection. Hikers and horseback riders are not the only ones disturbed by too much motorization. All the aforementioned resources are as well.	criteria used to identify additional routes to include in the route system. Issues that the commentor raises were considered in the evaluation (e.g., parallel and duplicative routes, environmental sensitivity, cultural resources, wildlife habitat sensitivity, and current and anticipated visitor use levels). The impact of the proposed routes is discussed in Chapter 4 of the Draft RMP/EIS.
Transportation	George and Frances Alderson	Off-road Vehicles: The approval of 1,387 miles of ORV routes in Alternative B is excessive and would impose too many impacts on the wilderness, wildlife habitat, and public use values. Too many ORV routes are too close together, forming a dense network. We believe this network exceeds BLM's ability to enforce regulations keeping vehicles on the designated routes. We urge that ORVs be restricted to a smaller network of more widely spaced routes. In addition: • ORVs should be barred from all proposed wilderness areas, a total of 132,000 acres, including all the areas shown in Map 3-15 in either pink or green. • No ORV routes should be in riparian zones or dry washes, because these are essential wildlife habitat.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system. Issues that the commentor raises were considered in the evaluation (e.g., parallel and duplicative routes, environmental sensitivity, cultural resources, wildlife habitat sensitivity, and current and anticipated visitor use levels). The impact of the proposed routes is discussed in Chapter 4 of the Draft RMP/EIS.
Transportation	Jack Johnston U4WDA	I saw no provision for establishing new roads or trails.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system in the future.
Transportation	Jim & Bonnie Vann	It is my suggestion and proposal that the BLM place a sign at this location advising motorized users that the easement road continuing to the west is; "Closed - Private Utility Easement" as traveling further along it will only result in a dead end with no outlet without trespass across private property. Leaving this road open or unsigned will invite either trespass onto private property along the south side, or entrance into a road less closed BLM area on the north.	Signing is an implementation decision and will be addresses at a later date.
Transportation	Margaret Stone	Moquith Sand Dunes The BLM is not only not proposing to protect one of these areas - Moquith San Dunes - but in their preferred plan is proposing to place it in grave peril. One of the motorized focus areas would extend northeast from Coral Pink Sand Dunes S.P. I have been in the park and the sand dune area NE of the S.P. both on my own and on a field trip with the Utah Native Plan Society. Signs that indicated the limit for motorized traffic were routinely ignored. In the Sand Springs area tracks were crossing areas of vegetation on the sand dunes and destroying the plants growing there. The Moquith Sand Dunes should be given ACEC status and they need to be given real physical protection since signs in sand dune areas are not successful.	The Welsh's milkweed conservation area B, in the BLM portion of the sand dunes, remains closed to OHV in the Proposed RMP/Final EIS. This area was designated in consultation with the USFWS. The area is continuing to be monitored to ensure adequate protection of the species. The RMP is in compliance with the IMP which allows for vehicle use on "existing ways and trails or within pre-FLPMA sand dune… areas" if they meet the non-impairment criteria. The range of alternatives does not identify additional vehicle ways or use off of the ways identified in the 1979-80 inventory. The impact analysis in Chapter 4 of the Draft RMP/EIS identifies short-term localized impacts to wilderness characteristics from use of these ways, but this use would not disqualify these lands from wilderness consideration by Congress.

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Transportation	Mark Sterkel	Often these ATV tracks result in torn up microbiotic soil, fragile plants crushed , streams churned & soiled, and emerging riparian flora squashed. Hikers have their impact, & inconsiderate bad apples, but boots leave seperate, non-contiguous impact prints, while ATV's leave a continuous track that can channel run off and lead to accelerated erosion much quicker.	Impacts from OHV use are addressed and disclosed in Chapter 4 of the Draft RMP/EIS.
Transportation	Mark Sterkel	To protect the resource, the DRMP should include some provision to stop the lawless renegade riders who cause much of the impact. This group is confrontational, rude, threatening, inconsiderate, irresponsible, & dangerous. While on foot in the Canaan Mtn WSA, ATV's have sped by me, stopped & spun 'donughts' around me, increased the recklessness of their riding in my vicinity, and attempted to run me over.	Law enforcement is beyond the scope of this RMP.
Transportation	Mark Sterkel	Shared use areas have been considered, but with hikers vs. OHV's, it is a futile concept. Quiet-sports people don't want to be near noisy lazy-sports riders because of the noise, fumes, damaged & torn-up terrain, & belligerent attitudes they create. Therefore, hikers won't use a 'shared' area, and it becomes a de-facto OHN-only area. These machines simply need their own dedicated (preferably trash already by them) area in which to wreak havoc.	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation.
Transportation	Mark Sterkel	In the DRMP route designation maps, under all alternatives, there are shown rt's that are redundant, unnecessary, and parallel. BLM should consider only one route in each open to access area's, closing , obliterating, reclaiming & enforcing the unneeded routes, in order to "manage" the resource for continuity.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system. Issues that the commentor raises were considered in the evaluation (e.g., parallel and duplicative routes, environmental sensitivity, cultural resources, wildlife habitat sensitivity, and current and anticipated visitor use levels).
Transportation	Norris Brown	I, Norris Brown, own the Sheep Springs Grazing allotment at the head of Dairy Canyon out of Johnson Canyon. By limiting access you will severely impact the use and management of this allotment.	There are exclusions based on authorized use as defined in 43 CFR 8340.0-5.
Transportation	Randy & Cynthia Norton	The increasing demand for OHV recreation opportunities on public lands and National forests is extensively documented. Therefore, we believe it is incumbent upon the Kanab Field Office Draft Resource Management planning team to maximize recreation opportunities. It must be maintained that OHV use in roaded natural and semi-primitive motorized settings for recreation use, be acceptable and compatible with established resource management objectives. With the idea that OHV trails can be constructed and maintained with demand increases.	The FLPMA directs BLM to manage public lands for multiple use and sustained yield (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM's Land Use Planning Handbook requires that specific decisions be made for each resource and use (See, Appendix C, Land Use Planning Handbook "H-1601-1"). Specific decisions must be included in each of the alternatives analyzed during development of the land use plan. As each alternative is formulated, each program decision is overlaid with other program decisions and inconsistent decisions are identified and modified so that ultimately a compatible mix of uses and management prescriptions result.
Transportation	Rebecca Mann	Off-Highway Vehicle (OHV) use on BLM land. Areas with unrestricted overland travel by OHVs should be extremely limited or closed because OHV use destroys plants and biological soil crust, disturbs wildlife, threatens archeological and paleontological resources, and disturbs other visitors' experiences. In addition, existing roads and routes, which may be designated as established roads in the	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system. Issues that the commentor raises were considered in the evaluation (e.g., parallel and duplicative routes, environmental sensitivity, cultural resources, wildlife habitat sensitivity, and current and anticipated visitor use levels). The impact of the

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		future, should be carefully assessed. Roads and routes should be closed if they a) cross through high value natural areas, such as riparian zones, wildlife breeding habitat, or rare plant territory b) are redundant - where one road could serve the same purpose as two, or c) have significantly low traffic and no particular value to travelers. The limitation of OHV roads will lessen environmental damage and make backcountry wilderness experiences much more pleasant for those wishing to escape the noise and pollution associated with motorized vehicles.	proposed routes is discussed in Chapter 4 of the Draft RMP/EIS.
Transportation	Richard Csenge	In the Kanab RMP Draft, Alternative B places greater restrictions than does current policy in key areas, however it does not go far enough. For example, the proposed number of miles of designated OHV routes are utterly unenforceable, given budget trends for hiring LE officers and Rangers within the BLM. Without constant enforcement and stiff penalties for infraction, OHV users will continue going "offtrail", spreading the kinds of damage already underway throughout the decision area. (see enclosure #2)	BLM has developed management prescriptions based on the resource needs. During the process, BLM has made the assumption that users will comply with the rules in affect. In addition, BLM is committed to contiuing to develop partnerships with organizations and user groups to continue monitoring and patroling of high-use areas and these efforts may enhance BLM's law enforcement capabilities.
Transportation	Richard Csenge	An intelligent policy would be to designate only the number of routes and mileage that can be reasonably expected to be patrolled. Later, ifbudgets increase, demand is present, and the policy of restriction to designated routes has been faithfully observed by the public, more could be added. Due to the inherent nature and impacts of motorized vehicle use both on or off highway, licensing, restrictions, and enforcement are essential tools to safeguard the public interest, in this case, shared ownership interests in public lands. (see enclosure #3)	BLM has developed management prescriptions based on the resource needs. During the process, BLM has made the assumption that users will comply with the rules in affect. In addition, BLM is committed to contiuing to develop partnerships with organizations and user groups to continue monitoring and patroling of high-use areas and these efforts may enhance BLM's law enforcement capabilities.
Transportation	Richard Csenge	Such values as visual, archaeological, vegetative, wildlife habitat, and water resources will all be adversely impacted if either alternative A, B, or D as proposed, is selected in the final decision for at least two reasons. One, all of these alternatives leave open too much of the decision area to damage by OHVs, through motorized recreation designations either as "open" or as "designated routes only" . Secondly, these alternatives also provide for mineral exploration and extraction of coal, oil and gas, for the most part at the least stringent standard throughout the southern region ofthe Kanab District, which virtually guarantees future damage to biological, archaeological, visual, water, and paleo resources that have been identified elsewhere within the Draft RMP, to be of high caliber.	The FLPMA directs BLM to manage public lands for multiple use and sustained yield (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM's Land Use Planning Handbook requires that specific decisions be made for each resource and use (See, Appendix C, Land Use Planning Handbook "H-1601-1"). Specific decisions must be included in each of the alternatives analyzed during development of the land use plan. As each alternative is formulated, each program decision is overlaid with other program decisions and inconsistent decisions are identified and modified so that ultimately a compatible mix of uses and management prescriptions result. Chapter 4 of the Draft RMP/EIS discloses the impacts to other resources and uses from OHV use.
Transportation	Ross Tocher	BLM's preferred "Alternative B" looks backward to the era of ORVs, when BLM should be looking forward. It is ill-advised and damaging to the resource to suggest an ORV route network of 1,387 miles in Alternative B - many routes only a mile apart, many in areas of high value for wilderness and wildlife habitat. Alternative B would produce a route density of 1.6 miles of DRV routes for every square mile of public lands. That should be corrected in the final plan by severely reducing the ORV route network.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system. Issues that the commentor raises were considered in the evaluation (e.g., parallel and duplicative routes, environmental sensitivity, cultural resources, wildlife habitat sensitivity, and current and anticipated visitor use levels). The impact of the proposed routes is discussed in Chapter 4 of the Draft RMP/EIS.

Category Name	Commentor	Comment	Comment Summary Response
Transportation	Ross Tocher	At the very least, BLM should exclude DRVs from wilderness study areas (WSA) and "wilderness characteristics" areas (WCA), because these represent a rare resource that is vital to southern Utah's tourist economy. I believe the following areas should have a high priority for closure to DRVs: • Parunuweap Canyon and its tributary canyons, a complex that connects with Zion National Park and attracts many visitors for its wild character. The areas shaded pink in Map 3-15 should receive the same protection, as these are among the most easily accessible parts of Parunuweap, bordering on main tourism routes US Highway 89 and State Route 9. • Moquith Mountain WSA and WCA, a diverse area including pine forests and part ofthe Coral Pink Sand Dunes. An "open" area of 1,100 acres for ORV free play within the WSA (in Alternative B) would be inappropriate. The Moquith Mountain loop ORV route should be closed. • Areas close to Kanab city need more protection for their wild character, because these are the most accessible to visitors staying in Kanab, via US 89. Among them are Vermilion Cliffs, including Hog Canyon - an area BLM has unwisely excluded from the WCA; Upper Kanab Creek, including Elkheart Cliffs, with riparian habitat and perennial streams; and canyons in Moquith Mountain WCA on the west side ofUS 89. These areas are an asset to the tourist economy of Kanab, but ORV traffic could turm them into a liability.	The IMP allows for open OHV use in sand dunes and continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Chapter 4 describes impacts from the presence and use of OHV ways and routes in WSAs and non-WSA lands with wilderness characteristics. The Proposed RMP/Final EIS has been changed to include management of several non-WSA areas with wilderness characteristics for those characteristics. These areas are limited to designated routes in the Proposed RMP/Final EIS.
Transportation	Sedona Thomason	I feel that the roads should not be closed because what about emergencies? I guess what I really mean is that if you have the roads closed are you going to let emergency vehicles through, example if there is a fire are you going to let fire trucks through or let the forest burn down? I feel very strongly on the subject of roads being closed down or even blocked, most people will break down gates if there is a serious emergency. So the Route Designations Map 2 - 19 Alternative D is the best choice where only a few roads down by Kanab Creek is closed.	There are exclusions based on official use and emergency needs. The exclusions are defined in 43 CFR 8340.0-5.
Transportation	Thomas Forsythe	The only actual road in this area comes off of Zion Rd and leads to a Kane County Water Conservancy water tank. None of the other trails are even claimed by Kane County. This even includes the former right of way for the highway - a road the county abandoned when Johnson Canyon was extended south to join Hwy 89. Notwithstanding that this former road now crosses private property, it remains on the BLM map as open to motorized use. The most egregious example of this affront to private property rights is the spur that leads across a pristine piece of high desert land near the water tower. This route crosses private property and dead ends at the boundary between the private land and public land.	Routes in the area below Thompson Point were reviewed by the BLM interdisciplinary team according to the criteria listed in Appendix K of the Draft RMP/EIS. Changes were made to these routes and identified on the map in the Proposed RMP/Final EIS.
Transportation	Thomas Forsythe	During this more careful review, it should also be considered that this area contains three spurs that lead to the base of Thompson point within 1/4 of a mile. These spurs lead to what is essentially the same viewpoint as the single Kane County road in the area. They provide no additional recreational opportunity than what is available through riding the well maintained county road.	Routes in the area below Thompson Point were reviewed by the BLM interdisciplinary team according to the criteria listed in Appendix K of the Draft RMP/EIS. Changes were made to these routes and identified on the map in the Proposed RMP/Final EIS.
Transportation	Thomas Forsythe	Furthermore, each of these spurs has become the launching pad for additional	Routes in the area below Thompson Point were reviewed by the BLM

Category Name	Commentor	Comment	Comment Summary Response
		spurs, some of which I witnessed being created by rambunctious neighborhood teenagers who destroyed vegetation and destabilized sensitive hillsides in their efforts at 'finding their own way.' Once those trails were established, the children moved on to destabilize new areas, leaving behind dead foliage and new two tracks that the BLM now appears intent on legitimizing despite their lack of destination and their redundant nature.	interdisciplinary team according to the criteria listed in Appendix K of the Draft RMP/EIS. Changes were made to these routes and identified on the map in the Proposed RMP/Final EIS.
Transportation	Tom Carter	In general, I would like to point out that it is counter productive to designate OHV routes without adequate oversight and enforcement since otherwise there is no way to enforce these plans. Therefore, I propose that all OHV operators who wish to operate within the resource area be required to apply for an annual use permit and the revenues created be used to fund enforcement of use of designated routes. Otherwise, the proposed plan exists only on paper and there would be no way to know if the designated routes and closed areas are being observed by OHVers. This population has an history of not obeying regulations and is not accountable either as individuals or by organizational ties.	The commentor's recommendation is beyond the scope of this land use plan.
Transportation	Utah Archeological Research Institute	We do not see a clear distinction between licensed passenger vehicles and OHVs on roads or an adequate and accurate discussion of these distinctions. Throughout nearly all of the DRMP/DEIS there is no discussion in each alternative distinguishing and separating OHV travel from that of licensed passenger vehicles. Whenever you discuss topics like Motorized Use of Routes, you need to differentiate OHV travel from that of licensed passenger vehicles. Furthermore, there is little discussion of existing roads verses designated roads.	The BLM does not differentiate between OHV use of routes and licensed passenger vehicle use of routes (43 CFR 8340.0-5). These vehicle classes are not separated in the Draft RMP/EIS. There is no requirement to separate these vehicle classes.
Transportation	Utah Archeological Research Institute	Therefore, we ask that is distinction be made in the DRMP/DEIS and appropriate discussions and actions be added to all sections discussing OHV use.	The BLM does not differentiate between OHV use of routes and licensed passenger vehicle use of routes (43 CFR 8340.0-5). These vehicle classes are not separated in the Draft RMP/EIS. There is no requirement to separate these vehicle classes.
Transportation	Utah Archeological Research Institute	In addition, why can't you close an area to all OHVs and limit travel only to commercially manufactured licensed passenger vehicles? The absence of defining and separating motorized vehicles into at least two classes is the most frustrating and annoying feature ofthe DRMP/DEIS.	The BLM does not differentiate between OHV use of routes and licensed passenger vehicle use of routes (43 CFR 8340.0-5). These vehicle classes are not separated in the Draft RMP/EIS. There is no requirement to separate these vehicle classes.
Transportation	Vaughn Bussma	The Plan does not solve the damage caused by hunters in their ATVs and trucks, a problem expressed by the BLM representatives at the meeting. More postings and restrictions will not change the way that they behave. More enforcement of existing rules during hunting will be necessary.	Law enforcement is beyond the scope of this RMP.
Transportation	Vaughn Bussma	Much of the land designated as closed for ATV riders under Plan B will become inaccessible to the many Utahns in my elderly age group who can no longer hike the trails.	FLPMA does not require that all public lands be vehicle accessible. In addition, designated recreational motorized routes are an administrative decision. However, the accessibility was considered in identifying routes (see Appendix K in the Draft RMP/EIS).
Transportation	Walter Fertig	Travel management: Again, I commend the BLM Kanab FO for eliminating cross-country travel by vehicles (except for designated routes). This will be a big step towards reducing resource damage to soils and native vegetation, which in turn	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system. Issues that the commentor raises were considered in the evaluation (e.g., parallel and

Category Name	Commentor	Comment	Comment Summary Response
		negatively affects wildlife and livestock. Developing a system of designated routes for ATVs is a good step to ensuring that these recreationalists have a place to pursue their activities. I do think BLM could have done a better job in evaluating what roads and trails should be part ofthe designated route system. Essentially the BLM maps are an inventory ofroads and trails, not a plan for managing travel, as many of these roads were not established using any erosion-reducing standards. The maps provided in the draft RMP depict a lot of redundant roads (roads that parallel each other and go to the same destination). BLM ought to develop a more public process to evaluate the necessity of some of these redundant roads - roads that reduce the visual appeal of our area, reduce cover for wildlife and livestock, and increase soil loss. Having roads and trails available for use is important, but I see little value in creating road densities that are so high that they impede other uses.	duplicative routes, environmental sensitivity, cultural resources, wildlife habitat sensitivity, and current and anticipated visitor use levels).
Travel Management – OHV Area Categories	Anne McKibbin	I spend time each year in Utah's wild areas, particularly in the southern areas of the Grand Staircase-Escalante National Monument near the Cockscomb, the Paria River, and areas adjacent to (and including) the Paria Canyon wilderness. I am concerned that the BLM's Travel Plan for roads and recreational ORV use in the area would severely damage the beauty and quiet of these places. They are not appropriate places for a designated route, and I hope that you will reconsider your proposed Plan. Those of us who backpack, hike, camp, and ride horses in this area do so because of its unparalleled beauty and peacefulness. Please don't destroy that experience by allowing gasoline-driven vehicles. At the least, allow significant parcels of open space where a person can get two miles from a vehicle. Sound travels a long way in the open spaces of Utah and it would be a shame to never get out of earshot of an ORV.	The final designated route system is intended to allow for multiple-use, including a mix of motorized use along designated routes and non-motorized use away from those designated routes. The proposed designated route system allows for large blocks of non-motorized use areas throughout the decision area. Also, the Proposed RMP does recognize the Paria Canyon Wilderness as an area closed to OHV use.
Travel Management – OHV Area Categories	Capital Trail Vehical Association	Because ofthe significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be "no net loss" of motorized recreational opportunities with the Kanab DRMP and DEIS project. We would ask that this project address the attached checklist of issues and address the goals and needs identified.	Alternative A of the Draft EIS analyzed motorized recreation opportunities throughout the decision area through an "open to cross country OHV use". FLPMA does not require the BLM to manage for "no net loss" of motorized recreational opportunities.
Travel Management – OHV Area Categories	Lo I and Won Yin	It would be a mistake to open 1,100 acres of Moquith Mountain wilderness study area to ORVs roving across the Coral Pink Sand Dunes. That area should be protected for its natural splendor. Also, the Moquith Mountain loop should be closed to vehicles, so this area can retain its wilderness character.	The 1,100 acres within the Moquith Mountain WSA is an OHV open area on sand dunes. BLM continues IMP monitoring and surveillance and takes actions when necessary to protect the naturalness of the area to ensure wilderness suitability.
Travel Management – OHV Area Categories	Lynn Hague	In the Kanab plan it should be a high priority to stop abuse by off-road vehicles in the proposed wilderness areas, including Vermilion Cliffs, Upper Kanab Creek, Parunuweap Canyon, Moquith Mountain, Canaan Mountain, and Paria River. ORVs have damaged scarce riparian wildlife habitat, taking a toll on wildlife values. We urge BLM to close all proposed wilderness areas to ORVs, as in Alternative C.	The range of alternatives included closing OHV use in non-WSA lands with wilderness characteristics and in WSAs. The Proposed RMP/EIS limits OHV use to designated routes in non-WSA lands with wilderness characteristics and designated ways in WSAs. The designated routes were chosen while assessing the potential impacts to riparian habitat. In addition, BLM has made the assumption that users will comply with the rules in effect.
Travel Management –	Marleen Bussma	If new rules and boundaries are created to keep out offenders, what guarantee is	BLM has developed management prescriptions based on the resource needs.

Category Name	Commentor	Comment	Comment Summary Response
OHV Area Categories		there that the offenders will now start to obey the restrictions? We were told that there are not enough BLM people to patrol the areas to ensure compliance with the rules. What will change after new rules go into effect? Those who go off the established trails will continue to do so, while I am not allowed anywhere near the area. The same goes for the littering problem.	During the process, BLM has made the assumption that users will comply with the rules in affect. In addition, BLM is committed to contiuing to develop partnerships with organizations and user groups to continue monitoring and patroling of high-use areas and these efforts may enhance BLM's law enforcement capabilities.
Travel Management – OHV Area Categories	Richard Csenge	Lastly in the Vermillion Cliffs region, motorized recreation should be strictly limited to existing routes and trails in the Hog Canyon Trail System. Trails should not be extended into the North Fork ofHog Canyon, where incursions are already taking place. Nor should motorized use be allowed to impact hikers who have ascended the Squaw Trail from Kanab City. This trail, along with others, which cannot be negotiated by OHVs, provide those who favor quiet sports a place close to Kanab City, where they can recreate without being disturbed by dust and noise from ATVs.	OHV use in Hog Canyon is limited to designated routes. The routes were designated by an interdisciplinary team which used the criteria listed in Appendix K of the Draft RMP/EIS. The new Tom's Canyon loop route is intended for non-motorized use, but actually overlaps with some motorized use routes. The area is co-managed for both non-motorized and motorized uses. BLM is obligated to maintain access to routes adjacent to the Squaw Trail. The route system is a designated right-of-way to the communication tower site.
Travel Management – OHV Area Categories	Utah Archeological Research Institute	So, if an area is closed to OHVs, it is also closed to all motorized transportation on all roads? This is unreasonable. You need to clarify this in all areas of the DRMP/DEIS where OHVs are discussed. This is discussed in more detail below.	There are exclusions based on official use and emergency needs. The exclusions are defined in 43 CFR 8340.0-5.
Travel Management – OHV Area Categories	Walter Fertig	My main quibble with the proposal in Alternative B is that a larger area ofCoral Pink Sand Dunes should be off-limits to ATV travel to protect the federally Threatened Welsh's milkweed (Asclepias weishU) and other BLM Sensitive species. Coral Pink State Park already offers ATV recreation, and the area obligated to the rare species is unnecessarily small. The dune area needs to be shared among various interests more equitably.	The Welsh's milkweed conservation area B, in the BLM portion of the sand dunes, remains closed to OHV in the Proposed RMP/Final EIS. This area was designated in consultation with the USFWS. The area is continuing to be monitored to ensure adequate protection of the species.
Travel Management – OHV Route Identification	Amber Sharkey	As a high school sophomore I am concerned with the closing of roads in Poverty and Steep Trail Areas surrounding my community. I believe that it is important to keep these roads open in case of emergencies and recreational activities. It is important to have extra roads in case if nature blocks roads then there will be outlet roads for emergencies. I also think it is good to have recreational areas for people can go and enjoy the out doors and the beautiful area that we have here.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use. Most of the Steep Trail route, except for the segment that parallels the fence, is closed in the Proposed RMP/EIS.
Travel Management – OHV Route Identification	Anthony Frost	After looking at the map Alternative B 2-17 I have noticed that the trail into poverty is on the list of being closed down to through traffic and becoming an area where only hiking will be permitted. One of the other reasons that we go there is to look at the scenery in our four wheel drive vehicles. There is a lot of country that is spectacular in this area. Many people from all around come here to look at what we have to show them. If these trails start closing then how are they going to be able to enjoy the things that they have always loved?	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.
Travel Management – OHV Route Identification	Barry Clarkson Clarkson Draper & Beckstrom, LLC	Closure of roads and trails significantly affects the value of my client's property as well as his ability to use his property. Furthermore, his business, including trail rides and atv access to public lands will also be diminished. And yet, in spite of requirements to include matters of socio-economic data in any land use plan, the RMP did not include such data.	Chapter 3 and 4 of the Draft RMP/EIS address current economic baseline and impacts of the proposed management actions on local economies.
Travel Management –	Bill May	...these in my opinion should be added to Alternative B. Dry washes are an ideal	Future route designations that could include certain dry washes, could be

Category Name	Commentor	Comment	Comment Summary Response
OHV Route Identification		route for OHV travel; rain erases any OHV tracts.	considered in implementation-level decision making according to the criteria in Appendix K of the Draft RMP/EIS.
Travel Management – OHV Route Identification	BLM - Arizona Strip Field Office	The route designations for Vermilion Cliffs National Monument will be completed with the Vermilion Cliffs National Monument Record of Decision/Approved Plan, however, the decisions on the routes in the Arizona Strip Field Office have not yet been made. These comments concern routes near or leading to routes in the Arizona Strip Field Office. We request that Kanab Field Office work with Arizona Strip Field Office to insure that routes crossing the Arizona/Utah state line are consistently designated. Most of these comments refer to possible inconsistencies across state lines (numbers refer to specific points on attached GIS map plots).	The Kanab Field Office is committed to continued coordination with the Arizona Strip Field Office on travel management issues.
Travel Management – OHV Route Identification	Bob Wallen	Comment on road closure located at UTM 12 S 0341718, 4114570; See attached maps and photos. I would like to request that the Field Office reconsider the closing of this short 1 mile long road and instead utilize the way to establish a trail head at this site to allow easy and convenient non-motorized access from this point to the Parunuweap and Virgin river area as well as continue to provide long time established uses. Even when acknowledging this short way is within a WSA there appears to be significant evidence that the Field Office has acted without due consideration to all ofthe directives of managing a WSA. For example. I have traveled this road many times including 9 consecutive days this fall and while GPSing this route on Nov 4 and dispute any claims of OHV "intrusions" causing the "degradation and impairment" necessary to permit BLM to close this prior existing route.(see attached photos) It is also "unreasonable" for BLM to initiate closures on known Kane County RS 2477 assertions as they have in this case.	A portion of the one-mile route the commentor references was identified during the initial wilderness inventory. This segment of the route was closed in Alternative B of the Draft RMP/EIS, but is open in the Proposed Plan. The remaining portion of the route was not identified during the initial wilderness inventory and is not recognized as a way in the Proposed Plan.
Travel Management – OHV Route Identification	Capital Trail Vehical Association	Our comments document that the current management trend towards massive motorized closures (25 to 75% ofthe existing routes) is not responsible to the public's needs for motorized access and recreation and is contrary to the multiple-use management directives specified by congress.	The BLM considered a range of alternatives that closed between less than 1% to almost 21% of miles of motorized routes. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of motorized access and recreation.
Travel Management – OHV Route Identification	Capital Trail Vehical Association	The proposed action must meet the needs of motorized recreationists both today and tomorrow. We respectfully request that the evaluation and proposal be directed to adequately address these issues and goals.	The current use and projected trend of OHV recreation was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.
Travel Management – OHV Route Identification	Capital Trail Vehical Association	The current approach for OHV management is inequitable because it takes the current motorized route inventory and tries to make it the route inventory for all users. It leaves out possibilities for constructing or otherwise developing non-motorized trails and ignores existing non-motorized trails that exist in both the planning area and adjacent lands.	The route identification process is flexible and adaptable to the construction of new routes. Appendix K, Travel Management/Route Designation Process, of the Draft RMP/EIS outlines the process to identify routes. The route/trail identification process is an implementation level decision. The Draft RMP/EIS addresses motorized route identification. Future implementation level decisions could address route/trail identification for both motorized and non-motorized uses as explained in Appendix K.
Travel Management – OHV Route Identification	Capital Trail Vehical Association	We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non- motorized trails, then the agency should consider options that do not reduce the existing	The route/trail identification process is an implementation level decision. The Draft RMP/EIS addresses motorized route identification. Future implementation level decisions could address route/trail identification for both motorized and non-

Category Name	Commentor	Comment	Comment Summary Response
		opportunity for motorized users.	motorized uses as explained in Appendix K. This could include changing user type, route/trail alignment, or other management.
Travel Management – OHV Route Identification	Capital Trail Vehical Association	The site specific analysis of each road or trail to be closed must address or identify where the public would go to replace the motorized resource proposed for closure. In other words, the analysis must adequately evaluate the site specific value of a road or trail proposed for closure to motorized recreationists. It must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing. An incomplete analysis is not acceptable under NEPA requirements.	The BLM analyzed each route to determine the values adjacent to the routes and potential uses of each route. The BLM applied the criteria described in Appendix K, to determine route identification, including “how route designation would affect setting, recreation activity, and experience opportunities in the area.” This information was used in to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Travel Management – OHV Route Identification	Capital Trail Vehical Association	34. Note that some new construction may be required to accomplish a reasonable system of loops. Therefore, new construction must be included in the scope ofthe project.	The current use and projected trend of OHV recreation was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.
Travel Management – OHV Route Identification	Capital Trail Vehical Association	We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision.	All routes identified in the Draft RMP/EIS are multi-use and do not restrict the mode of travel.
Travel Management – OHV Route Identification	Capital Trail Vehical Association	The Plan for this project area does not recognize and address this trend. The management plan for the Kanab project area must adequately recognize and address this trend.	The current use and projected trend of OHV recreation was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.
Travel Management – OHV Route Identification	Capital Trail Vehical Association	A significant closing of roads and motorized trails in the project area is not consistent with meeting the needs ofthe public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657.	The BLM considered a range of alternatives that closed between less than 1% to almost 21% of miles of motorized routes. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of motorized access and recreation.
Travel Management – OHV Route Identification	Charles Robinson	The Proverty roads should not be closed in my opinion because we as older citizens need access into these very beautiful, interesting, and historical areas as the slot canyons, petroglyps, and Spanish sword engraving. I am all for all tracks to stay on existing roads. However, I and most of America, can't walk over a mile in deep sand, therefore I need a cherry stem road to these areas. These accesses to Prunaweep Canyon need to be left open for us to enter this most beautiful canyon.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.
Travel Management – OHV Route Identification	Charles Robinson	The proposed road closure of Elephant Cove would be a sad day at our home. These roads have been open for many years. The Shuns berg Mail Drop is a very significant historical venue. The road needs to be left open to the areas as it is too far for anyone (except 20 year-olds) to walk. As I get older (60 year old) I need a cherry stem road to be able to visit the drop site. I work for the post office and this part ofhistory is not only interesting, but significant for Kane and Washington County history.	The Shunsberg Mail Drop route is in the St. George Field Office and outside the scope of the Kanab RMP. The Elephant Cove route was open in the Preferred Alternative and remains open in the Proposed RMP.

Category Name	Commentor	Comment	Comment Summary Response
Travel Management – OHV Route Identification	Charles Robinson	The Broad Hollow Road should be left open for recreation and historical use. The loop is a great ride for the outdoor and historical enthusiast This could and should be a great ATV trail on BLM land. The old cabins, the beautiful scenery, the atmosphere are incredible and it would be a shame to shut us citizens out of such an area.	The Broad Hollow Road is in the St. George Field Office and outside the scope of the Kanab RMP.
Travel Management – OHV Route Identification	Charles Robinson	Access to Cannan Mountain from Broad Hollow should be left open for the scenery and historical reasons. The old sawmill, the shingle drop are really neat and we shouldn't be deprived of visiting this area. Only a very tiny percent (about 1/1000 of 1%) of American citizens or tourists will ever be able to visit, as it is way too far and difficult to walk to. A cherry stem road would at least get us into the vicinity of all this beauty.	The Broad Hollow Road is in the St. George Field Office and outside the scope of the Kanab RMP.
Travel Management – OHV Route Identification	Charles Robinson	Moquith Mountain (Lamb Point) closing the spurs off the loop road would be very detrimental to us older generations. The scenic pinnacles and pine trees are unmatched in beauty. The balanced rocks, windows and arches are incredible. Petroglyps and Indian caves are some ofthe best in the west. Each spur road goes to something incredible and is there for a reason. These should not be closed.	The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS.
Travel Management – OHV Route Identification	Chris Bell U4WDA	Not designating the following as wilderness since all these have existing machine made roads. A. Sheep Springs B. Four Mile Creek C. Kanab Creek	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Travel Management – OHV Route Identification	Coalition to Preserve Rock Art	As a result we believe that the proliferation of OHV routes in the area needs to be carefully considered. Those that provide direct access to important cultural resource sites should be closed at lease one quarter mile from sites eligible for NRHP status.	As noted in the Draft RMP/EIS page 4-3, one of the over-arching assumptions for the impact analysis is that "public land users would comply with the decisions and allocations contained in the alternatives." The Draft RMP/EIS proposes a variety of actions and analyses the impacts of those actions. There are countless ways that individuals can inadvertently or wantonly not comply with the Draft RMP/EIS prescriptions, none of which are actions proposed in any of the chapter 2 prescriptions. Impacts from illegal behavior are therefore an issue of enforcing the prescriptions contained in the various alternatives. Allocation of law enforcement presence is an Administrative Action by the BLM and does not require a specific planning decision to implement. The resources and uses that the commentor raises were considered in identifying routes. The criteria in Appendix K was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification.
Travel Management – OHV Route Identification	Colin Esplin	The reason that I'm writing this letter is to express my concern on the issue of road closing, more specifically the Poverty road. Because I have used this road before and enjoyed the things that you can see from the use of this road I would like to see it remained open. The young men and young women in my ward went	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use. The route that leads to the Virgin River is closed in the Proposed Plan due to recurring impacts to the WSA's wilderness suitability.

Category Name	Commentor	Comment	Comment Summary Response
		on a four wheeler ride on this road for an activity one night. I also went and had a great time. We rode down to the river to see the Indian art on the canyon walls. Being able to ride down there allows you to do it in one evening. The closing of this road would consequently not allow you to be able to do this.	
Travel Management – OHV Route Identification	Colorado Plateau Archaeological Alliance	Given the scope of the proposed Travel Plan as articulated in the Kanab Draft EIS, and the anticipated increase in OHV use over the next decade, a more careful consideration of cumulative impacts from future OHV use should be reflected in the planning and route designation document.	Impacts from continued OHV use along identified routes within the Kanab decision area are addressed in the Draft RMP/EIS in the Section 4.2.8. Impacts noted in this section are from all the actions proposed in chapter 2 of the Draft RMP/EIS. The commentor provides no specific information applicable to the Kanab Field Office of impacts that need to be added to either Section 4.2.8 or Section 4.6.
Travel Management – OHV Route Identification	Dale Grange	One of the routes that I feel should be included for continued use is the extension of the route on Moquith Mountain to the overlook at Hell's Dive Canyon. This is a magnificent overlook and always brings me a sense of exhilaration. I always enjoy viewing the wildlife in the area. It is amazing to see how much less threatened they appear when I am on my ATV than when I am simply hiking.	The Proposed RMP/EIS has been adjusted to open the route to Hell Dive to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	Dale Grange	A second route I would object to being closed is the route to the overlook of the East Fork of the Virgin River at the Barracks in the Elephant Butte area. Several great hikes are available from the overlook at the termination of the existing route. This route existed prior to the WSA inventory and should have been "inventoried" prior to the creation of the WSA. I urge BLM to use their authority to leave it open in the WSA and ultimately let Congress determine whether it should be closed. At present it is not detrimental to the wilderness values in the WSA and would not prevent its ultimate designation.	The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use.
Travel Management – OHV Route Identification	Dale Grange	The third route that concerns me is the route from the Hog Canyon area to Thompson Point. Again the views are tremendous and I great a great sense of well-being when I travel in this area. Each of the proposed Jamboree routes loops will be negatively impacted if they were to be unavailable for travel.	An adjustment was made to the Thompson Point route to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	David Armbruster	In general Special Recreation Management Areas (SRMA) designations need further clarification not to explicitly exclude any user group. Specifically the Kanab Community SRMA OHV Recreation Management Zone (RMZ) needs clarification for the process by which adding or expanding routes will be possible.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system in the future.
Travel Management – OHV Route Identification	David Armbruster	In studying the maps and documents in the DRMP/DEIS for Alternative B, the U4WDA has found roads shown to be closed that should not be closed and has been informed by the local clubs that some existing roads are not shown on the maps. This seems to be a mistake and an attempt to close roads that are part of the Counties Transportation Plans or RS2477 roads that are being claimed by the Counties. It is imperative that the status of these routes be determined and a legal public review be done before any action is taken to close them.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administrati
Travel Management – OHV Route Identification	Don Black U4WDA	We support the RMZ, but the RMP should include more direction regarding when and how additional or expanded routes would be provided. We feel that an expanded and improved trail system in the area would give the public an	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system in the future.

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		appropriate place for motorized tecreation and take pressure off of more sensitive areas.	
Travel Management – OHV Route Identification	Donald Kramer	Road closures that are shown in alternative B that concern me the most are the "lambs Point" at the southwest end of the Moquith Mountain road. This is a sandy area and keeping the road open does not appear to damage the environment while keeping the first 3/4 of the road open. In hot weather this lengthens the hike to the point with no available water to make it dangerous as hikers will not be able to carry enough water. This will also prevent a lot of people from being able to see this beautiful area as the hike will prevent the young, elderly and those not in "premium" physical condition from seeing it. Reasons to keep these motorized trails open- Benefits Personal- Bonding with family and friends, stress relief, enhanced awareness and appreciation of natural resources, greater self reliance and renewed human spirit, Improved physical fitness and health, closer relationship with nature. Community- Stronger sense of community dependancy on public lands, greater family/ group bonding. Economic- Enhanced local economy via purchases (gas, groceries, lodging, outdoor equipment, etc) Environmental- Increased awareness and protection of natural landscapes for future generations.	The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS.
Travel Management – OHV Route Identification	Donald Kramer	Two of the roads that lead to trail heads in the Parunuweap wilderness study area are shown for closure in alternatives "b and C" the one that is accessed from route 9 just west of the East Zion lodge and goes south into the wilderness study (73.11.910 by 112.47.715) area is listed for closure in these alternatives. I have hiked to mineral gulch from this road and its closure will make most of those areas unaccessible to me and my wife. Neither of us are handicapped but we are in average shape. Extending this hike would in effect make it inaccessible. Reasons to keep these motorized trails open- Benefits Personal- Bonding with family and friends, stress relief, enhanced awareness and appreciation of natural resources, greater self reliance and renewed human spirit. Improved physical fitness and health, closer relationship with nature. Community- Stronger sense of community dependancy on public lands, greater family/ group bonding. Economic- Enhanced local economy via purchases (gas, groceries, lodging, outdoor equipment, etc) Environmental- Increased awareness and protection of natural landscapes for future generations.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.
Travel Management – OHV Route Identification	Donald Kramer	Another motorized trail listed for closure is Lambs Point (36.59.952 byl12.41.418) the road most of the way down is shown open in option B but closed in option C. If there is not enough ecological impact to close the first 3/4 of the road how can the last couple miles make a difference. This is a beautiful area with views ofthe Arizona strip. Reasons to keep these motorized trails open- Benefits Personal- Bonding with family and friends, stress relief, enhanced awareness and appreciation of natural resources, greater self reliance and renewed human spirit. Improved physical fitness and health, closer relationship with nature. Community- Stronger sense ofcommunity dependancy on public lands, greater family/ group	The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS.

Category Name	Commentor	Comment	Comment Summary Response
		bonding. Economic- Enhanced local economy via purchases (gas, groceries, lodging, outdoor equipment, etc) Environmental- Increased awareness and protection ofnatural landscapes for future generations.	
Travel Management – OHV Route Identification	Donald Kramer	Rock Point approaching the Parunuweap Wilderness Study area from the south. (37.10.159 by 112.49.474) This closure will in effect close all access to the Virgin Canyon on that trail. It would be difficult to carry enough water to hike to the canyon then down in. It will also close access to all but the ultimately fit. This road is through thick sagebrush and I did not see any trails out off of the road. The road does not appear to create erosion problems and appears to be a wildlife trail. It does not appear to adversely effect wildlife. It is a popular hunting area and closures in this area will be hard to enforce with high numbers ofhunters used to access. Reasons to keep these motorized trails open- Benefits Personal- Bonding with family and friends, stress relief, enhanced awareness and appreciation of natural resources, greater self reliance and renewed human spirit. Improved physical fitness and health, closer relationship with nature. Community- Stronger sense ofcommunity dependancy on public lands, greater family/ group bonding. Economic- Enhanced local economy via purchases (gas, groceries, lodging, outdoor equipment, etc) Environmental- Increased awareness and protection ofnatural landscapes for future generations.	The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use.
Travel Management – OHV Route Identification	Donald Sprecher	I chose to address the road closures in the preferred Alternative "B". THOMPSON POINT T 0410 S ROAD CLOSURE IN SECTIONS: R 0090 W 20, 21,26,27, 28 This road has fantastic views to the south, from the top of Vermillion Cliffs, You can view the Kiabab Plateau, Kanab Creek, and Mt. Trumbull. If closed as marked it would require a hike for me of approximately 1-3/4 mile one way, over 3 miles round trip. I am physically unable to hike that distance.	An adjustment was made to the Thompson Point route to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	Donald Sprecher	LAMBS POINT ROAD CLOSURE SECTIONS: T 0440 S 12 R0080W This road will deny access into Arizona and the Piute Indian Reservation. It has become obvious the BLM has had a request from the Piute Tribe to deny access, and the federal lands managed by the Arizona Strip Field Office has not taken Any consideration how that road continues and re-enters the State of Utah further west. The closure is denying access back into Utah. Lambs Point offers excellent views to the south of Kanab Canyon and west to Mt. Trumbull from the end of the road. That would require a hike of over 4 miles round trip without a place to replenish Water.	The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS.
Travel Management – OHV Route Identification	Donald Sprecher	MOQUITH MT. T 0430 S ROAD CLOSURE SECTIONS: R 0070 W 27, AND 28 That road leads to a site of ancient historical resources. There are hieroglyphs and boulder-sized matates that are hard to find of that size. Plus there are pit houses that could be protected with a fence and an educational site and kiosk could be placed at the end of the road at that site. I can walk into that site. It would be impossible for me to hike the entire 2 1/2 mi round trip. And that would be a dry hike if no water in the canyon seep when you get there. I have worked with Doug McFadden (retired BLM archeologists) on privately owned property,	The Proposed RMP/EIS has been adjusted to open the route to Hell Dive to allow access for development of a public-use cultural site.

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		and have experience with those type of sites. The BLM should use that site as an educational resource, rather than close the area. Use the area to educate.	
Travel Management – OHV Route Identification	Donald Sprecher	BARRACKS/ROCK CANYON T 0420 S ROAD CLOSURE SECTIONS: R 0090 W 1, 11, 12, 14, 15,23 FANTASTIC VIEWS OF THE VIRGIN RIVER AND ZION NATIONAL PARK I HUNT THIS AREA FOR MULE DEER This road has been in use for many generations from the late 1800's according to my wife's grandfather (Merrill Robinson) who I questioned in 1987 his knowledge of this road. He told me that it was used as a cattle trail to cross the Virgin River and 4x4 vehicles had used the road after WW II when Jeeps and 4x4 became available to the civilians. I have a friend who was raised in Orderville Ut., and he told me when he was old enough at age 12, they would gather cattle on the Paria Plateau herd them across the Arizona Strip then to Moccasin Arizona, up thru Broad Hollow or over Canaan Mt. for water on top then back down into the Barracks or Rock Canyon. He told me they had many crossings down into the Virgin River and out to Mt Caramel or up Poverty and over to the Valley Junction up Long Valley to Alton or up to Glendale Bench to Alton. His name is Mac Sorenson. He hated the cattle drives. This closure would require a round trip of over 4 miles. 2 miles downhill, and 2 miles uphill with no place to refill water. I would have to carry over 2 gallons of water if I could make this hike.	The Barracks/Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use.
Travel Management – OHV Route Identification	Donald Sprecher	POVERTY ROAD CLOSURE SECTIONS T 0410 S R 0090 W SEE ABOVE COMMENT AS HISTORIC CATTLE TRAIL TURNED TO ROAD AS MODE OF TRANSPORTATION CHANGED THRU THE YEARS. I also hunt this area for mule deer.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.
Travel Management – OHV Route Identification	Donald Sprecher	BLOCK MESA ROAD CLOSURE SECTIONS T 0420 S 1O, 11, 14, 18, 22, 27, R0090W Here we have roads on top of a relatively flat top mesa, with beautiful views, but the sand is very difficult for me to walk on. I use my ATV for access when I hunt mule deer in this area. Sections 10, 11, and 17 would require 4 miles round trip. Part of the loop thru section 22, and 27 from the main Jeep trail could be eliminated, but not the entire road in that section.	The sections cited by the commentor include a network of routes. Some of the routes were included in the initial wilderness inventory and other routes were not. Some routes identified in the intial wilderness inventory remain closed in the Proposed RMP due to recurring impacts to the WSA's wilderness suitability. Routes not identified in the inventory are not included in the transportation system. Identifying and inventorying new ways within WSAs is beyond the scope of this plan. The route inventory within WSAs is based on the initial wilderness inventory (1979-1990).
Travel Management – OHV Route Identification	ECOS Consulting	The BLM should state clearly that "limited" means that OHV use will be limited to designated routes within riparian areas, that OHV use will not be precluded from riparian areas, and that such OHV use will adversely affect the riparian areas.	As defined in the Draft RMP/EIS glossary and Chapter 2, limited to designated routes means that OHV use will be limited to specific roads and trails identified by BLM regardless of resource interactions.
Travel Management – OHV Route Identification	ECOS Consulting	What are the purposes and reasons for each of the designated OHV routes? The DRMP/EIS fails to adequately address the purpose of these routes.	The BLM is not required by law or regulation to identify a purpose for each identified route. Resources and resource uses were considered in identifying the routes in each alternative. The criteria to select or reject specific roads and trails, as specified in the BLM's planning handbook (BLM-H-1601-1), are identified in Appendix K.
Travel Management – OHV Route	ECOS Consulting	Has the BLM documented the specific purpose of each OHV route it intends to designate? This must be done, and if a road is found to be redundant or if no	The BLM is not required by law or regulation to identify a purpose for each identified route. Resources and resource uses were considered in identifying the

Category Name	Commentor	Comment	Comment Summary Response
Identification		specific and compelling purpose, it must be closed and rehabilitated.	routes in each alternative. The criteria to select or reject specific roads and trails, as specified in the BLM's planning handbook (BLM-H-1601-1), are identified in Appendix K.
Travel Management – OHV Route Identification	Five County Association of Governments	In many cases, such class D roads have been slated for closure. We ask that the final RMP remove submitted Class D roads from routes slated for closure.	A "D" route does not equate to a County road assertion. The Draft RMP/EIS does not distinguish between types of routes (e.g., D or B roads). The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route Identification	Five County Association of Governments	County officials submitted inventories of Class D county roads during the planning process, and requested that the RMP honor such designations. In many cases, such class D roads have been slated for closure. We ask that the final RMP remove submitted Class D roads from routes slated for closure.	A "D" route does not equate to a County road assertion. The Draft RMP/EIS does not distinguish between types of routes (e.g., D or B roads). The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route Identification	Five County Association of Governments	Many of the routes identified as open only for administrative use lead to important water sources. Most of these locations have been identified by the Utah State Engineer as the source of formally approved state water rights. These are valid existing rights held by private citizens or corporations. Access to these valid existing rights should not be constrained by administrative use designations that allow use only by federal employees. Holders of valid state water rights should be allowed access.	BLM is obligated by law to honor valid, existing rights. Similarly, holders of valid, existing rights are obligated to honor federal laws regarding the use of federal lands for the exercise of those rights. BLM does not foresee frequent situations in which BLM's obligations under federal law would cause the agency to take actions that would prevent the holders from fully exercising their valid existing rights. BLM works diligently with the owners of valid, existing rights to prevent such situations from occurring. If the holder of a valid, existing right believes the BLM has taken an action that prevents the exercise of that right, the proper venue for determining equitable compensation or mitigation is in a court of valid jurisdiction, not within the context of a land use plan.
Travel Management – OHV Route Identification	Garrett Hill	It has been brought to my attention that there is a plan to close the poverty and steep trail roads. I have a few questions and some concerns. First off I would like to know the reasons that you are closing these roads. I would like these roads to remain open. Me and my family enjoy recreation and travel down these roads. I don't see why these roads need to be closed. There is nothing there that is harmed by riding through these areas. Also I would like to inform you that I am a high school senior and a seasonal intern in the Range Department. If these roads are closed it would mean that to maintain the fences and the box canyon spring at steep trail we would have to hike 1 mile with all the supplies needed to maintain these fences and box canyon spring. That would take a full ten hour day. With the road open it only took us about four hours to ride out there pack the supplies down a little hill and build the fence and put the gate in.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use. Most of the Steep Trail route, except for the segment that parallels the fence, is closed in the Proposed RMP/EIS.
Travel Management – OHV Route Identification	Geno Ramsey Canyon Country 4x4	The canan sawmill road is of major concern to me. The road has existed since the early 1900's and used for many things such as ranching, logging, and many recreational uses. Not to mention the unmatched beauty that the mountain has to offer and the local pioneer history. It is beyond be how such a road could closed.	The Canaan Sawmill route is in the St. George Field Office and outside the scope of the Kanab RMP. The Hell Dive route is one of the side roads on the Moquith Loop road and is open

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		Another is the "side roads" on the Moquith Loop road. These side roads lead to some ofthe most beautiful and unaccessible areas in our county. Rich in culture and history.	in the Proposed Plan.
Travel Management – OHV Route Identification	Jacalyn & Charles Liebfried	Roads to destinations such as, but not limited to, Lamb Point, Hell Dive and the Virgin River should remain open. These are beautiful spots and should not be limited to people in perfect physical condition.	The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS. The Proposed RMP/EIS has been adjusted to open the route to Hell Dive. The commentor refers to the Virgin River route and it is unclear which specific route is being referred to.
Travel Management – OHV Route Identification	Jack Christensen	3) Three areas having "Wilderness Characteristics" are in fact not. These areas are: Sheep Springs, Four Mile Creek and Kanab Creek. All three of these roads have been machine groomed and bladed by either the BLM or the County.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Travel Management – OHV Route Identification	James & Lorna Sills	Kanab Community Special Recreation Management Area (SRMA) Off-Highway Vehicle (OVID Recreation Management Zone (RMZ) aka. Hog Canyon Trail System We support the RMZ, however the RMP lacks direction regarding when and how additional or expanded routes would be provided. An improved trail system would give the public an appropriate place for motorized recreation while reducing pressure on more sensitive areas. We support the proposal and map submitted by Canyon Country 4x4 for managing this RMZ.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system in the future.
Travel Management – OHV Route Identification	James & Lorna Sills	Transportation In perusing the maps in the DRMP/DEIS for Alternate B, we note roads closed that should not be closed. Why is an attempt being made to close roads that are part of the Counties Transportation plans? These roads along with the RS2477 roads that are being claimed by the counties should remain open and identified on subsequent maps and documents. Further there are existing roads not shown on the maps, thus making it difficult if not impossible to make meaningful comments regarding the RMP process as it pertains to Alternate B. Management Actions for the Transportation System Management 2-26 states; "Coordinate transportation planning with Kane and Garfield Counties". In view of the above stated omissions and errors we would like to know how this is to be accomplished.	The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administrati
Travel Management – OHV Route Identification	Jeff, Kendalee, Mccrae, Buster and Maddie Cox C-4 Ranch	Third question, if you just put a sign in the ground, would the road be opened for administrative purposes and permit holders? If so, that's not good either, because if you can use the roads but close then to the public, you will have a lawsuit on your hands. I'm sure you have logically thought through all the possible scenarios. Personnally as a permitee, I don't enjoy the noise, dust, the traffic and the risks involved with managing the range, however I wouldn't want to deny anyone the right to travel the roads and view the scenery that has been done so for so many years. There are plenty of other slot canyons and places that I go,	There are exclusions based on administrative and official use. The exclusions are defined in 43 CFR 8340.0-5 and would include access to maintain or improve range improvements and other livestock management related needs.

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		where travel is not permitted or accessible, to enjoy the serenity of the great outdoors.	
Travel Management – OHV Route Identification	Jennifer Kaufman	I ask that the BLM in the final plan of the RMP close to OHVs the trail that runs east from the television towers past the bench to a dead end. Squaw Trail is a very popular well developed non-motorized trail just north of Kanab City and offers a fantastic recreation opportunity for local citizens and visitors. When visitors ask me for a hike close to town, I send them to Squaw Trail. OHVs still would have a spectacular view of all vistas from vantage points on routes by the television towers and along the tops of the cliffs trails system so I feel that it is unnecessary to continue a route near the top destination of Squaw Trail.	OHV use in Hog Canyon is limited to designated routes. The routes were designated by an interdisciplinary team which used the criteria listed in Appendix K of the Draft RMP/EIS. Minor adjustments were made to the existing route system due to resource and access concerns, including access to State sections.
Travel Management – OHV Route Identification	Jennifer Kaufman	I feel that all of the other proposed routes in this area duplicate each other as they appear to run parallel to each other and dead end into similar viewpoints. A few of the routes cross or deadend into private land. I have put a X on the routes that I feel are unnecessary as a motorized route for recreation.	Routes in the area below Thompson Point were reviewed by the BLM interdisciplinary team according to the criteria listed in Appendix K of the Draft RMP/EIS. Changes were made to these routes and identified on the map in the Proposed RMP/Final EIS.
Travel Management – OHV Route Identification	Jerry & Cindy Foote	1. One of our favorite areas to ride is down Poverty Canyon to the Virgin River. Under Alternative B the access to the Virgin River is proposed to be closed. We are against this closure for several reasons. First, the Virgin River in this area is a very scenic area with a magnificent Indian rock art panel. Second, this access is part of the Kane County travel plan and should be under their control. Third, the excuse has been given that this road was not part of the 1976 road inventory and as such should be closed. We submit that the 1976 road inventory plan was hastily done without actually examining the roads on the ground and thus to close this road on that basis is without merit.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use. The route that leads to the Virgin River is closed in the Proposed Plan due to recurring impacts to the WSA's wilderness suitability. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route Identification	Jerry & Cindy Foote	2. Mirrored across the Virgin River is the Rock creek we are against the closure of the Rock creek access road. This road has been in existence for over 30 years and is considered an RS-2477 road by Kane County.	The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route Identification	Jerry & Cindy Foote	We would like to comment on the closure of Moquith Mountian to Lambs Point road and the road to Hell Dive Canyon as proposed in Alternative B. Hell Dive Canyon has one of the premier Indian drawings and grinding stones in the area and to close them off to ATV access would deprive many from ever viewing their beauty. Making this an interpretive site by the BLM would allow people to enjoy and learn from these sites as well as offer any protection that is felt needed. This road is also considered an RS-2477 road by Kane County and is part of their transportation plan.	The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS. The Proposed RMP/EIS has been adjusted to open the route to Hell Dive to allow access for development of a public-use cultural site. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.

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Travel Management – OHV Route Identification	Jerry & Cindy Foote	The road out to the tip of Moquith Mountain, commonly called Lambs Point, presents the best panoramic views of the Arizona Strip and the Vermilion Cliffs. Alternative B proposes to close the road from where it leaves the Moquith Mountain road and enters Arizona. Further, according to the BLM Alternative B maps, this road does not exist where it returns back into Utah from Arizona. This indicates that the road inventory that the BLM has is wrong. This entire road from where it leaves the Moquith Mountian road out to Lambs Point was machine made and is clearly pre-1976. On this basis it is also an RS-2477 road and is rightfully claimed by Kane County as part of their transportation plan.	The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route Identification	Jim & Bonnie Vann	2.) The second road of concern is the one that crosses the state line into Arizona before returning to Utah and terminating at Ed Lamb Point. This road is of particular concern because it has been entirely omitted from the BLM maps under all four Proposed Alternatives as if it doesn't even exist. Interestingly, this road does appear on both the 2005 and 2006 BLM area maps however. What happened to it under this RMP? The Kanab Field Office staff have been verbally advised of this omission and oversight on several occasions, but have made no effort to correct this error. An error on the part of the BLM on a project of this size might be understandable were it not for a second road that has simply been eliminated from any maps associated with this RMP. That road leads to the north rim of the Virgin River and an incredible Indian petroglyph panel. Does the BLM think that they can simply take well known roads off a map and have them just disappear from comment? This shameful behavior by the BLM Field Office fuels the resentment, distrust, and animosity towards them by the local community. This road also qualifies as a Kane County road under RS-2477 rights. As stated earlier, I support those rights. Equally important however, is the fact that it allows access to Arizona and the upper reaches of the Kaibab Piute Indian Reservation, allows users to visit and enjoy a unique geologic area known locally as the "Beehives", and provides one of the few views off the Vermillion Cliffs across the Arizona Strip and down Kanab Creek to it's confluence with the Colorado River at the Grand Canyon. It is a truly spectacular "visual resource".	The first route the commentor cites is a way that was not identified in the initial wilderness inventory. Identifying and inventorying new ways within WSAs is beyond the scope of this plan. The route inventory within WSAs is based on the initial wilderness inventory (1979-1990). The second route that leads to the north rim of the Virgin River is the Rock Canyon route. The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use. The third route is the Lambs Point route. The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route Identification	Jim & Bonnie Vann	The area and roads of specific concern appear as part of "Alternative B and C" on the Mt. Carmel map in the Block Mesa portion of the WSA. The two roads proposed for closure are on the mesa top between Joseph Canyon and Merwin Canyon, and the second road is between Merwin Canyon and Baybill Canyon. Both of these roads were "mechanically built" sometime prior to 1976. The roads were put in to harvest juniper posts and for ranching purposes. These roads clearly appear on aerial photos prior to 1976 and are a part of the Kane County transportation plan by virtue of RS-2477 rights. I support the assertion of those county rights. The very nature of these roads should have eliminated any possibility of the surrounding lands being considered for Wilderness Study Areas after the completion of the previous WSA inventories. The fact that these roads were either accidentally or intentionally overlooked by the BLM in the prior	The first route was identified in the intial wilderness inventory and remains closed in the Proposed RMP due to recurring impacts to the WSA's wilderness suitability. The second route was not identifed in the initial wilderness inventory. Identifying and inventorying new ways within WSAs is beyond the scope of this plan. The route inventory within WSAs is based on the initial wilderness inventory (1979-1990). The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administrati

Category Name	Commentor	Comment	Comment Summary Response
		inventory calls into question the very validity of the WSA in this area now. More recently, these two roads have again been GPSed and photographed. The BLM Kanab Field Office staff have been specifically advised of the machine built nature of these roads. Yet, the roads remain on the map as a proposed closure. It would appear that the BLM is intentionally overlooking facts that are evident on the ground in an effort to support an inappropriate de facto WSA and using those distorted facts to drive road closures in the area. This deliberate error on the part of the BLM, and the fact that they continue to ignore new information that would not support a WSA, would call into question the completeness and integrity of the entire prior inventory, possibly affecting the existence of other Wilderness Study Areas within the Kanab Field office operating area. I do not believe that the BLM has the authority to designate this area as a WSA, and to propose the closure of these roads.	
Travel Management – OHV Route Identification	Jim & Bonnie Vann	The area and road of specific concern appears as part of "Alternative B and C" on the Thompson Point map. The road that is proposed to close is at the very south end of a section line fence road that terminates near a point on the topographical map called the "Mansard". This road, for all purposes turns into an ATV track where it comes off the ledges and descends to a spectacular Indian site under a large overhang. The site has numerous art drawings pecked into the stone and unusual slide marks that have been worn into the rock after years of use by native peoples. This area has been frequented for years by local residents and is well known to all. There is no impairment or degradation at this site even after years of visits. The only other way to reach this site is by an arduous climb up the face of the Vermillion Cliffs that takes about 1-1/2 hours and is not possible in the summer due the cliffs being south facing.	An adjustment was made to the Thompson Point route to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	Jim & Liz Robinson	It would be a mistake to establish an "open" zone for ORVs in the Coral Pink Sand Dunes in Moquith Mountain WSA. The adjacent state park caters to ORVs, allowing them on a "play area" of 1,000 acres. The wilderness character of the WSA would be degraded by allowing ORVs driving cross-country.	The OHV open area in the Moquith Mountain WSA has been designated for OHV use since during the initial WSA inventory in 1979-80. The OHV open area has been in use without impairing the wilderness characteristics for which it was inventoried.
Travel Management – OHV Route Identification	Jim and Bonnie Vann	1.) The first road of concern is the furthest east of the three roads with proposed closures under Alternatives B and C. It is a very short (but very significant) road that runs east & west off the main road from Elephant Cove and terminates at a place referred to as "Steep Trail" This area is well know to the BLM. This road was originally put in as a river crossing for sheep wagons and is a "cultural resource", although its descent down to the river gorge is no longer used, or passable. Grazing permitees are currently using this area, and cattle frequent it in their trips down to the river to drink. This road provides a spectacular view into the Virgin River Gorge and is claimed by Kane County as a RS2477 road. Since there is no possibility of travel beyond the current termination. I suggest that this road remain open for its "visual resource" view into the river gorge.	Most of the Steep Trail route, except for the segment that parallels the fence, is closed in the Proposed RMP/EIS. The remaining portion of the route was not identified in the initial wilderness inventory. Identifying and inventorying new ways within WSAs is beyond the scope of this plan. The route inventory within WSAs is based on the initial wilderness inventory (1979-1990). The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route	Jim and Bonnie Vann	3.) The third road on the south side of the river that is listed as a closure under Alternatives B and C is on the west side of Rock Creek. This road is proposed to	The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an

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Identification		close under alternative B where it exits a State School Section and enters the WSA. If this happens, it will require users to walk approximately 2.5 miles in very soft sand to reach the end. This road essentially ends at a big outcropping of rock and again provides a spectacular view into the Virgin River gorge (probably the best of the three roads on the south rim). The BLM has recently put posts in the ground to discourage OHV users from continuing down to the river. This area would make an excellent interpretive site for the BLM while still allowing the public to visit and enjoy it. This area would lend itself to a cooperative effort between the OHV communities and the BLM as a project to fence the end of the road at its current location with a kiosk containing interpretive information for visitors as both a "cultural and visual resource" area.	identified way open to OHV use.
Travel Management – OHV Route Identification	Jim and Bonnie Vann	1.) The first road proposed for closure under both Alternative B and C is the one farthest to the east and terminates across from the road described above as "Steep Trail" on the south rim. This is the north side of the old wagon road that crossed the Virgin River and is of both historical and cultural significance. At its motorized end on the ledges above the river, it provides one of the easier access points by foot trail down to the river. This road is also a Kane County RS-2477 road and should remain open to its current point.	The route that leads to the Virgin River is closed in the Proposed Plan due to recurring impacts to the WSA's wilderness suitability. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route Identification	Jim and Bonnie Vann	2.) Moving to the west, the second road proposed for closure has again been simply eliminated from any maps associated with the RMP where it exits a State School Section and heads south above the Virgin River. This road exists both on the ground and on previous BLM maps. The road is listed as a Kane County RS-2477 road and is used frequently for its access to one of the best Indian art panels in the entire area. This area would make an excellent interpretive site for the BLM while still allowing the public to visit and enjoy it, and there has been no impairment or degradation to this site. This area would lend itself to a cooperative effort between the OHV communities and the BLM as a project to fence the end of the road at its current location with a kiosk containing interpretive information for visitors as a "cultural resource" area. The real question is, what happened to this road under this RMP? The Kanab Field Office staff has been verbally advised of this omission and oversight on several occasions, but have made no effort to correct this error. An error on the part of the BLM on a project of this size might be understandable were it not for a second road that has simply been eliminated from any maps associated with this RMP. That road leads to Lamb's Point and has been noted previously. Does the BLM think that they can simply take well known roads off a map and have them just disappear from comment? This is shameful behavior by the BLM Field Office and fuels the resentment, distrust, and animosity towards them by the local community.	The route was not identifed in the initial wilderness inventory. Identifying and inventorying new ways within WSAs is beyond the scope of this plan. The route inventory within WSAs is based on the initial wilderness inventory (1979-1990).
Travel Management – OHV Route Identification	Jim and Bonnie Vann	3.) The third and last road in this area is the one farthest to the west and currently terminates above the Virgin River at Poverty Flat after crossing Poverty Wash.. This road was also machine built as a bulldozed stock tank exists at its end. It is a claimed RS-2477 road by Kane County and I do not believe the BLM has the	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.

Category Name	Commentor	Comment	Comment Summary Response
		authority to close it to travel.	
Travel Management – OHV Route Identification	Joan Thacher	I request that each separate route be evaluated to show it's necessity and "contribution to protection of sensitive resources". I do not believe that Alternative B should simply open 92% ofthe routes because they are already there.	The process used to designate routes is explained in Appendix K. The criteria in Appendix K was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Travel Management – OHV Route Identification	Joan Thacher	I request that the routes in these areas be re-evaluated and closed where erosion and scaring is a problem.	In the Proposed RMP, cross-country travel has been eliminated in fragile soil areas.
Travel Management – OHV Route Identification	Joan Thacher	OHV routes have no business in these areas. ATV's often use these areas as playgrounds. I request that you protect these areas and restrict travel there.	As noted in Appendix K of the Draft RMP/EIS, routes and impacts to riparian areas were considered in route designations.
Travel Management – OHV Route Identification	John Veranth	However, I will comment that in general, the proliferation of ORV routes shown in BLM Alt B is far in excess of any reasonable accomodation of recreational vehicle use and will lead to future resource management problems. A well defined network of main routes, scenic loops, and spurs to overlooks is managable and enforceable. The haphazard jumble of proposed routes not.	A range of alternatives was considered in developing the transportation system. The process used to identify routes in the transportation system is described in Appendix K.
Travel Management – OHV Route Identification	Josh Heaton	Because I really like to go hunting and four wheeling down on the poverty. And if those roads are closed that will stop me and many other people from enjoying a favorite past time.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.
Travel Management – OHV Route Identification	Karen Kramer	In the Kanab RMP/EIS area, I have hiked to Mineral Gulch, what a great slot canyon!!! However if I had to hike from the proposed closure site in plan "B" and "C" into Poverty Flat, which is part ofthe Parunuweap Wilderness study area, the hike down and then on the return hiking UP would stop me from even trying to hike into this slot The access to this slot canyon is by way of State Route 9 west ofthe Zion Lodge and goes south into the wilderness study area.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.
Travel Management – OHV Route Identification	Karen Kramer	Lamb's Point gives a wonderful view ofthe Arizona Strip. This vista is on the southwest end of the Moquith Mountain road. This is one ofthose deep sandy roads that are very tiring to hike, with no water source.	The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS.
Travel Management – OHV Route Identification	Karen Kramer	In plan "B" the Moquith Mountain road would be open except for the last several miles, essentially closing it to all except for the very fit hiker. In plan "C" the entire road would be closed, essentially closing it to everyone.	The Proposed RMP/EIS has been adjusted to open the route to Hell Dive to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	Karen Kramer	I have yet to get to Rock Point on the south end of the Parunuweap Wilderness study area. My understanding is that by closing this road it will close the access to the Virgin Canyon on the south end, to all except for the extreme hiker. It will make this area an additional 5+ mile hike just to the edge ofthe Virgin Canyon, with a 5+ mile return, this does not even include hiking into the Virgin Canyon itself. Effectively closing Virgin Canyon to almost everyone.	The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use.
Travel Management –	Lance Jackson	The closures that I am referring to are the following: The last mile of the Moquith	The last mile of the Moquith Mountain road is the Lamb's Point route. The route

Category Name	Commentor	Comment	Comment Summary Response
OHV Route Identification		mountain road, the roads that go down into the Parunaweap canyon from the south side of the river, and the roads going down to the parunaweap canyon froom the north side of the river known as the poverty area.	crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS. The road down to the Parunaweap Canyon on the south side is the Rock Canyon route. The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use. One route down to the Parunuweap Canyon from the north side is closed in the Proposed Plan due to recurring impacts to the WSA's wilderness suitability. The second route down to the Parunuweap Canyon from the north side was not identified in the initial wilderness inventory. Identifying and inventorying new ways within WSAs is beyond the scope of this plan. The route inventory within WSAs is based on the initial wilderness inventory (1979-1990).
Travel Management – OHV Route Identification	Land Use Volunteers of Kane County	There are significant problems with a number of the route segments contained in the Alternative B Travel Management Plan. The following tracks should be removed from the plan because they are already creating excessive resource damage, or they will encourage significant resource damage as more and more ORV's enter the area.	The routes described by the commentor were evaluated based on the criteria described in Appendix K of the Draft RMP/EIS. The routes remain open in the Proposed Plan.
Travel Management – OHV Route Identification	Land Use Volunteers of Kane County	Because this geographic area is of wilderness quality and has fulfilled the requirements for ACEC status, a more extensive inventory of resources should be completed before approval of an RMP Travel Plan. The current BLM inventory is inadequate and does not include or accurately map the distribution of many of the archeological, botanical, wildlife , cultural , and ecological resources present in the area that may be impacted by ORV's. This inventory needs to be completed before the final version of an DRMP is approved.	While the entire Kanab Field Office has not been inventoried for cultural, wildlife, etc. the best available data was used. As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available. The route identification process is flexible and adaptable to adding or removing routes from the transportation system. Appendix K of the Draft RMP/EIS outlines the criteria and process. Future implementation level decisions could address route/trail identification for both motorized and non-motorized uses as explained in Appendix K.
Travel Management – OHV Route Identification	Land Use Volunteers of Kane County	We recommend that designated routes be placed in dry washes only when the route is an established road that is necessary to travel to a major destination. The rest of the dry wash routes should be deleted from the Travel Plan.	Future route designations that could include certain dry washes, could be considered in implementation-level decision making according to the criteria in Appendix K of the Draft RMP/EIS.
Travel Management – OHV Route Identification	Land Use Volunteers of Kane County	We recommend that the Travel Management Plan avoid designating any routes that parallel streams or riparian zones. Alternative designated routes should be sought out and used.	As noted in Appendix K of the Draft RMP/EIS, routes and impacts to riparian areas were considered in route designations. The route identification process is flexible and adaptable to adding or removing routes from the transportation system. Appendix K of the Draft RMP/EIS outlines the criteria and process. Future implementation level decisions could address route/trail identification for both motorized and non-motorized uses as explained in Appendix K.
Travel Management –	Land Use Volunteers	We recommend that the BLM complete the necessary field work and analysis to	Appendix K of the Draft RMP/EIS includes a description of the process and

Category Name	Commentor	Comment	Comment Summary Response
OHV Route Identification	of Kane County	rid the Travel Plan of redundant, parallel, and unnecessary routes before completing the final version of the RMP.	criteria used to identify additional routes to include in the route system in the future. The criteria in Appendix K includes considering redundant, parallel, and unnecessary routes.
Travel Management – OHV Route Identification	Land Use Volunteers of Kane County	We also think that routes that dead end at the boundaries of Wilderness Study Areas and School Trust Lands be deleted from inclusion in the Travel Plan for the same reason mentioned above.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system in the future. Dead end routes can be beneficial depending on topography, resources, and access needs.
Travel Management – OHV Route Identification	Land Use Volunteers of Kane County	We recommend that no designated transportation routes should cross private land. Additionally, no designated routes should dead end at the border of private land, because this will lead to uninvited incursions onto private land by ORV's. We have seen this happen in the field. Sometimes the riders break down gates and cut fences to gain entry.	BLM does not designate routes across private property. The BLM transportation plan is limited to routes on BLM-administered lands. Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify routes in the route system. While use patterns were a consideration in the route designation process, the potential for illegal use is an implementation issue and was used as a sole determination for closing routes.
Travel Management – OHV Route Identification	Laura Welp	Does this re-opening of roads imply that the problems for which the designated trail system was put in place, i.e. "to protect soil, vegetation, wildlife, cultural and riparian area resources that have been adversely impacted or are at risk of being adversely impacted by OHV use", resolved? The level of non-compliance with the Hog Canyon OHV trail system is such that reopening roads will only lead to more damage (photos available upon request).	OHV use in Hog Canyon is limited to designated routes. The routes were designated by an interdisciplinary team which used the criteria listed in Appendix K of the Draft RMP/EIS. Minor adjustments were made to the existing route system due to resource and access concerns, including access to State sections.
Travel Management – OHV Route Identification	Laura Welp	The plan also shows new roads that were not in the original Hog Canyon transportation plan (for example, see photos on page 9 of attachment). Those roads were not planned under the appropriate NEPA process and should not be legitimized in the RMP.	OHV use in Hog Canyon is limited to designated routes. The routes were designated by an interdisciplinary team which used the criteria listed in Appendix K of the Draft RMP/EIS. Minor adjustments were made to the existing route system due to resource and access concerns, including access to State sections.
Travel Management – OHV Route Identification	Laura Welp	In doing so, the BLM failed to conduct any analysis concerning whether these roads were necessary, had defined destinations, went through sensitive areas, were duplicative, etc. The plan lacks the rigorous analysis that would have supported the BLM's decision.	OHV use in Hog Canyon is limited to designated routes. The routes were designated by an interdisciplinary team which used the criteria listed in Appendix K of the Draft RMP/EIS. Minor adjustments were made to the existing route system due to resource and access concerns, including access to State sections.
Travel Management – OHV Route Identification	Laura Welp	The BLM can not please everyone with their transportation plan, but it would go down easier with all segments of the public if the method by which the BLM decided which roads to close and which to leave open was transparent and understandable. To provide the best transportation plan for the public, the BLM should analyze all roads before designating them as open or closed. Analysis should include impacts to wildlife, soil erosion, hydrological function, loss of AUMs, vegetation, and archaeological resources. As it stands, the BLM's proposed transportation plan is not a fair balance between open and closed areas.	The process used to designate routes is explained in Appendix K. The resources and uses that the commentor raises were considered in identifying routes. The criteria in Appendix K was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Travel Management – OHV Route Identification	Laura Welp	These OHV trails are often just tracks that were driven on once, but they are being enshrined in the RMP. Many of the homeowners adjacent to this informal network of trails will be subjected to noise, dust, declining property values, and annoyance of OHV use directly adjacent to their homes. The concentration of roads within this two-section block is excessive and unnecessary; in fact, the	The identified routes in the Proposed RMP located north of the Vermilion Cliffs subdivision have been modified based on public comment and review by the Kanab Field Office.

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		BLM is creating a de-facto, back-door play area here. Every ridgeline does not have to have a trail on it.	
Travel Management – OHV Route Identification	Laura Welp	Trails should not be designated open in riparian zones.	As noted in Appendix K of the Draft RMP/EIS, routes and impacts to riparian areas were considered in route designations.
Travel Management – OHV Route Identification	Margaret Stone	Routes that end up causing damage to the resources and beauty of an area either because of their location or because riders refuse to stay on them should be eliminated.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system in the future. Resource impacts were considered in identifying routes to include in the transportation system.
Travel Management – OHV Route Identification	Marlin Sharp Lone Peak 4 Wheelers	I believe the BLM needs to allow for additional trails to be added to the area in the future. This area economy of recreation could benefit by added trails and an expanded trail system.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify additional routes to include in the route system in the future.
Travel Management – OHV Route Identification	McClain Cox	I looked at the information that was given and I am still at a loss as too why exactly the roads are being closed down. If you could tell me why the poverty road on map M-217 is possibly being closed I would be most appreciative. I know there is reasons for this and I know that there is a compromise available. If the BLM could let us locals know exactly what we are doing wrong that is hurting the landscape let us know instead of cutting it off from us.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.
Travel Management – OHV Route Identification	Mitch Thompson	Specifically the Mail Drop. Please consider leaving access to these areas open in your plans.	The Shunsberg Mail Drop route is in the St. George Field Office and outside the scope of the Kanab RMP.
Travel Management – OHV Route Identification	Richard Csenge	To manage OHV use properly, there must be a transportation system that identifies designated routes and trails . No lands should be simply left open for cross country travel. The number ofmiles of routes should be small; three to five hundred miles at most.	The action alternatives of the Draft RMP/EIS include a transportation system that identifies designated routes.
Travel Management – OHV Route Identification	Robert Aiken	The road to Thompson Point, in "Alternative B" is proposed to be closed. This will eliminate all the accesses for individuals to see the beautiful views along the rim to the point. We have made several visits to area and enjoy the views and the wildlife in the area. In our visits we have not seen any other ATV operators. People with handicaps and limited mobility will not be able to enjoy the area.	An adjustment was made to the Thompson Point route to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	Russell Howe	I believe that the BMP User Stats are not correct, and that Table 3.26 should be eliminated. I believe many of the proposed closing of roads should be kept open to large groups of familys, friends, and friendly organizations. These roads include Rock Canyon, Spur, The Poverty, Flat Road, Virgin River Access Road (The Barracks). Also the Hell Drive, Ed Lamb Point Road (Moquith Mountain), Vermillion Route, Willis Canyon (Thompson Point) and Black Mesa Route (Black Mesa). Also the Sheep Springs, Four Mile Creek, and Kanab Creek have existing machine made roads which have been in service for many years.	Table 3-26 in the Draft RMP/EIS is based on the recreation management information system (RMIS) data collected by the Kanab Field Office. As stated on page 3-78 of the Draft RMP/EIS, "It is important to note that the visitation figures in Table 3-26 are only estimates and do not reflect actual visitation occurring in any given year for specific activities in specific areas. Many areas lack direct visitation monitoring facilities such as traffic counters or visitor registers. Direct monitoring by BLM staff is focused on areas of greater use or conflict. Discrepancies in actual use are also a result of the remote nature of much of the decision area that does not receive frequent monitoring. In addition, many of the popular use areas/trails are not designated and there is currently no way to

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			accurately determine the actual amount of recreational use these areas receive." As cited in Section 4.1.6, the recreation data is noted as incomplete, however the best available data was used to compile baselines and depict trends in use. Visitor-days are calcuated as described on pages 3-77 and 3-78. This is the standard BLM definition of visitor-days and is a common recreation unit of meaure used among federal agencies. The routes in Sheep Springs, Four Mile Creek, and Kanab Creek are open in the Proposed RMP.
Travel Management – OHV Route Identification	Samuel & Janet Smith	We have noticed that the road to Thompson Point, in "Alternative B", is proposed to be closed. This will eliminate all the accesses for individuals to see the beautiful views and vistas offered as the road winds its way out to Thompson Point. For the past 8 years our family and visitors have traveled to the point to enjoy the vista overlooking the Shinarump Cliffs, the White Sage Flats and beyond; the Kaibab Plateau. We have taken numerous photos ofour family from this location. We have enjoyed this area very much. From there we are able to hike to the white rock outcroppings and enjoy other explorations as we hike along the Vermillion Cliffs which overlooks our home below. In our many visits we have only seen other OHV operators, all of which have been locals from this area.	An adjustment was made to the Thompson Point route to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	Samuel & Janet Smith	We are equally distressed at the proposed closing of access into Willis Canyon. That is where we take our Grandchildren, visiting from the City, and teach them of the importance of conservation, respecting the land as an obligation for them to remember. We have visited and picnicked along Willis Creek on many occasions. Here we have rarely seen others, and have not disturbed the land other than passing over the deep sand to reach our favorite locations.	The Willis Canyon route was closed due to cultural resource concerns.
Travel Management – OHV Route Identification	Samuel & Janet Smith	I would also like to make a comment on the proposed closure ofthe Moquith Mountain and the road to Hells Dive Canyon. Hells Dive Canyon has some ofthe premier Indian Pictographs and Grinding Stones in this area, to close access off from the general public would be very disappointing. We would suggest that the B.L.M. use this area as an interpretive site, somewhat like the one in Indian Canyon where people could go and enjoy these great sites without damaging them. This should be a relatively easy project with help coming from both the Hiking and O.H.V. community. This would also keep another Kane Co. RS 2477 road open for public use.	The Proposed RMP/EIS has been adjusted to open the route to Hell Dive to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	Samuel & Janet Smith	The view off the end of Moquith Mountain is one of the most spectacular views that are available of the Arizona Strip. It is the only place that a person can look off the Vermillion Cliffs to see this magnificent view that reaches to the confluence of the Kanab Creek and the Grand Canyon to the south. This is also a very long hike, 10 to 15 miles, through the deep sand; that I'm sure is not for the general public or senior citizens. Without the use of an OHV many of us senior citizens will be denied the opportunity to enjoy many areas of public lands.	The route the commentor refers to is Lamb's Point. The Lamb's Point route crosses the state line into the Kaibab-Paiute reservation. In consultation with the Tribe, the Lamb's Point route is closed in the Proposed RMP/Final EIS.

Category Name	Commentor	Comment	Comment Summary Response
Travel Management – OHV Route Identification	Shane Baird	The first comment is that I believe Alternative D is the best choice except for the roads to Poverty I think they should stay open, because the community and I plan to hunt there.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.
Travel Management – OHV Route Identification	Steven Edmunds	Sheep Springs Road, Four Mile Creek and Kanab Creek are man made roads with many man made fixtures, such as corrals, tanks, spurs.	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Travel Management – OHV Route Identification	Susan Hand	Parunaweap, Motorized Canyon RMZ. I strongly disagree with the placement of an OHV touring route in a WSA! There are many opportunities available elsewhere, and motors are simply not compatible with management guidelines established for WSA's. On the other hand, I applaud the closure of the Barracks and Poverty Flat routes.	The Parunuweap SRMA is removed from the Proposed RMP. After further review, the inventoried way is open to OHV use in the Proposed RMP.
Travel Management – OHV Route Identification	Susan Hand	Upper Squaw Trail. This is the most popular hiking trail in our community, and the one that most visitors are directed to. The ridge which is the primary destination of this trail should not be open to OHV use. The KFO provides few developed hiking trails, and it seems a shame to sacrifice any of them. Please protect this important resource from unnecessary user conflicts.	OHV use in Hog Canyon is limited to designated routes. The routes were designated by an interdisciplinary team which used the criteria listed in Appendix K of the Draft RMP/EIS. Minor adjustments were made to the existing route system due to resource and access concerns, including access to State sections.
Travel Management – OHV Route Identification	SUWA	Th BLM preferred alternative travel plan includes high route density across the planning, and wanton designation of redundant routes devoid of clear purpose and need to the very real detriment of non-motorized recreation and resource preservation.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify routes to include in the route system. Under FLPMA's multiple-use mandate, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple-use concept, the BLM does not necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands.
Travel Management – OHV Route Identification	SUWA	The DRMP/EIS does not present this information with respect to the differing travel networks under consideration in the DRMP/EIS. There is no way for a reviewer to identify the basis for the specific route designations proposed or confirm that the BLM has ensure that these designations comply with the legal and policy obligations set out above.	Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify routes to include in the route system. The routes were designated by an interdisciplinary team which used the criteria listed in Appendix K of the Draft RMP/EIS.
Travel Management – OHV Route Identification	SUWA	In order to justify the suitability of the proposed route network, the BLM must provide information on the reasons for designating the routes (i.e., destination, use), impacts of the routes on other resources, how those impacts can otherwise be mitigated or avoided, and the manner in which designation of the route for the proposed use is consistent with the agency's obligations under its regulations and policy.	The routes were designated by an interdisciplinary team which used the criteria listed in Appendix K of the Draft RMP/EIS. Appendix K of the Draft RMP/EIS includes a description of the process and criteria used to identify routes to include in the route system.
Travel Management –	Tobin Gardner	The roads I pray will remain open include: Rock Canyon Spur, (The Barracks) the	The routes in Sheep Springs, Four Mile Creek, and Kanab Creek are open in the

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OHV Route Identification		Poverty Flat Road, (The Barracks) Virgin River Access Rd, (The Barracks) Hell Dive, (Moquith Mountain) Ed Lamb Point Road, (Moquite Mountain) Vermillion Route, (Thompson Point) Willis Canyon (Thompson Point) Block Mesa Route (Block Mesa). Sheep Springs, Four Mile Creek, and Kanab Creek all have existing machine made roads that have been around for many many years. It would be a shame to see this beautiful land closed.	Proposed RMP.
Travel Management – OHV Route Identification	Tom Carter	I live below the Thompson Point Archeological site located above my residence where I have hiked to observe the unique and irreplaceable Petroqlyphs over the past 10 years. And I have witnessed the steady illegal intrusion by OHVs into this area, creating a worn entry road that has at this time been developed to a point just below the arc site and has continued below as well making a illegal loop around the mesa that shelters the site. I suggest that barriers be constructed to block entry and that the two track illegal road be re- vegetated.	An adjustment was made to the Thompson Point route to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	Tom Grant	The Squaw Trail. Under the proposed plan "B" the top of this trail would be opened to ATV traffic. Although it is currently closed, I see regular evidence of ATV use. This includes tracks not limited to an old road heading out to the "bench" and the Kanab Overlook, but tracks all over the top of the plateau, without regard to any trails.	OHV use in Hog Canyon is limited to designated routes. The routes were designated by an interdisciplinary team which used the criteria listed in Appendix K of the Draft RMP/EIS. Minor adjustments were made to the existing route system due to resource and access concerns, including access to State sections.
Travel Management – OHV Route Identification	Tony Wright	All of the roads that lead down to the Virgin River, below the Barracks, in "Alternative B", are proposed to be closed. This will eliminate all the accesses for anyone to see the beautiful Virgin River as it winds its way down the canyon through the White Cliffs.	The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use.
Travel Management – OHV Route Identification	Tony Wright	You may say that hikers will visit this area. But they will have to travel about 15 to 20 miles in an O.H.V. before being able hike to the river on the Poverty side of the Virgin River. It would eliminate the general public from seeing one of the best Indian Pictographs in our area, because of the hike into them, about 3 miles one way.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use. The route that leads to the Virgin River is closed in the Proposed Plan due to recurring impacts to the WSA's wilderness suitability.
Travel Management – OHV Route Identification	Tony Wright	On the south side of the Virgin River, you are proposing to close the Rock Creek accesses road. This road has been in existence for over 30 years, and I personally traveled down this road in 1972 with a group of 10 people who were camping and sightseeing in the area in our O.H.V.'s. This is also, considered a RS2477 road claimed by Kane County. It is my understanding that a RS2477 road cannot be closed except by court order and there have been no cases in the court, to date, that have changed this ruling.	The Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route Identification	Tony Wright	This is the access that hikers use when they travel down Fatmans Misery Canyon to the Virgin River, they then travel up stream and come out at their O.H.V.'s at Rock Creek for the trip home. This closure would make them hike another 4 to 5 miles in the deep sand. It would also keep any handicaped people from seeing the great site off of the end of this road down to the Virgin.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use.
Travel Management –	Tony Wright	I have heard from an employee of the B.L.M. that the Rock Creek road is being	The Rock Canyon route was considered in the range of alternatives in the Draft

Category Name	Commentor	Comment	Comment Summary Response
OHV Route Identification		closed because there has been some damage to the area out on the end. Wouldn't it be better to put up a fence around the end of the road, so that people can not go any further than where the road ends? This seems like a better alternative than to close the road to everyone, who would like to enjoy it.	RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use.
Travel Management – OHV Route Identification	Tony Wright	Hells Dive Canyon has some of the premier Indian drawings and Grinding Stones in this area, and to close them off from the public would be a crime. I would suggest that the B.L.M. use this area as an interpretive site, somewhat like the one in Indian Canyon where people could go and enjoy these great sites without damaging them. This should be a relatively easy project with help coming from both the Hiking and O.H.V. community. This would also keep another Kane Co. RS 2477 road open for public use.	The Proposed RMP/EIS has been adjusted to open the route to Hell Dive to allow access for development of a public-use cultural site. The RMP does not adjudicate, analyze, or otherwise determine the validity of the claimed ROWs. The BLM will update and adjust the transportation plan and elements of this RMP through plan maintenance as RS 2477 ROW assertions are acknowledged administratively or adjudicated by court decision.
Travel Management – OHV Route Identification	Tony Wright	All of the roads that lead down to the Virgin River, below the Barracks, in “Alternative B”, are proposed to be closed. This will eliminate all the accesses for any one to see the beautiful Virgin Riveras it winds its way down the canyon through the White Cliffs. You may say that hikers will visit this area. But they will have to travel about 15 to 20 miles in an O.H.V. before being able hike to the river on the Poverty side of the Virgin River. It would eliminate the general public from seeing one of the best Indian Pictographs in our area, because of the hike into them, about 3 miles one way.	The Barracks/Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use.
Travel Management – OHV Route Identification	Tony Wright	On the south side of the Virgin River, you are proposing to close the Rock Creek accesses road. This road has been in existence for over 30 years. This is the access that hikers use when they travel down Fatmans Misery Canyon to the Virgin River, they then travel up stream and come out at their O.H.V.’s at Rock Creek for the trip home. This closure would make them hike another 4 to 5 miles in the deep sand.	The Barracks/Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use.
Travel Management – OHV Route Identification	Tony Wright	Hells Dive Canyon has some of the premier Indian drawings and Grinding Stones in this area, and to close them off from the public would be a crime. I would suggest that the B.L.M. use this area as an interpretive site, somewhat like the one in IndianCanyonwhere people could go and enjoy these great sites without damaging them.	The Proposed RMP/EIS has been adjusted to open the route to Hell Dive to allow access for development of a public-use cultural site.
Travel Management – OHV Route Identification	Tracy Hiscock	The BLM RMP recognizes and allows use of numerous short, spur routes which lead to the boundaries of legislatively protected areas such as Wilderness Study Areas, Zion National Park, Bryce Canyon National Park, and Grand Staircase/Escalante National Monument, where continued motorized travel onto such adjacent lands is prohibited. All such spurs should be closed under the RMP because they only create opportunities for illegal behavior resulting in resource damage.	The Proposed RMP has been revised based on input from public comments and coordination with federal agencies and the Kaibab-Paiute Tribe.
Travel Management – OHV Route Identification	Utah Rock Art Research Association	We believe the only OHV road that should provide access to this area is the current trail that starts from Highway 237 and proceeds through Elephant Gap to the rim of the East Fork of the Virgin River and then proceeds east along the river to Mount Carmel. The many other trails in this area, both east and west and on	The process used to designate routes is explained in Appendix K. The resources and uses that the commentor raises were considered in identifying routes. The criteria in Appendix K was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route

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		the north side of the river, should be closed. This will provide the most appropriate level of protection for the area rich in archeology and wilderness resources.	identification. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Travel Management – OHV Route Identification	Utah Rock Art Research Association	As a result we believe that the proliferation of OHV routes in the area needs to be carefully considered. Those that provide direct access to important cultural resource sites should be closed at least one quarter mile from sites eligible for NRHP status.	As noted in the Draft RMP/EIS page 4-3, one of the over-arching assumptions for the impact analysis is that "public land users would comply with the decisions and allocations contained in the alternatives." The Draft RMP/EIS proposes a variety of actions and analyses the impacts of those actions. There are countless ways that individuals can inadvertently or wantonly not comply with the Draft RMP/EIS prescriptions, none of which are actions proposed in any of the chapter 2 prescriptions. Impacts from illegal behavior are therefore an issue of enforcing the prescriptions contained in the various alternatives. Allocation of law enforcement presence is an Administrative Action by the BLM and does not require a specific planning decision to implement. The resources and uses that the commentor raises were considered in identifying routes. The criteria in Appendix K was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification.
Travel Management – OHV Route Identification	Wayne Cox	I strongly disagree with the proposed road closures in the Barracks and Poverty BLM areas. These roads have existed for decades and should remain open to the public. I have traveled these roads my whole life, with my father and siblings, and now with my own family. For many people, these roads are the only access to certain areas along the Virgin River. I feel there are many benefits to leaving these roads open.	The Proposed RMP/EIS has been modified to include the Poverty Flat route as an identified way open to OHV use. The Barracks/Rock Canyon route was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include this as an identified way open to OHV use.
Travel Management – OHV Route Identification	Western Watersheds Project, Inc.	The DEIS/RMP should provide or reference more specific details concerning motorized and non- motorized designations and designated travel routes including the total and percentage of acres and their condition within: .each stream drainage or subbasin; aoverlapplnq livestock grazing allotments, aoverlapplnq special designation area (ACECs, WSAs etc) asensitive areas such as fragile soils, sensitive wildlife habitats .and those acres of sensitive values affected by motorized and non-motorized and travel route proposals.	The process used to designate routes is explained in Appendix K. The resources and uses that the commentor raises were considered in identifying routes. Impacts to all resources and resources uses from OHV use and identified routes are contained in Chapter 4 of the Draft RMP/EIS.
Travel Management – OHV Route Identification	Western Watersheds Project, Inc.	BLM has not adequately analyzed the direct, indirect and cumulative effects of the RA's road and trail network, the huge number of closed roads and trails that continue to be used illegally by ATVs and dirt bikes, and the incidence of newly created, illegal routes. There has been no analysis of road density effects.	The BLM analyzed each route to determine the values adjacent to the routes and potential uses of each route. The BLM applied the criteria described in Appendix K, to determine route identification, including “how route designation would affect setting, recreation activity, and experience opportunities in the area.” This information was used in to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS on pages 4-189 through 4-192.
Travel Management – OHV Route Identification	Zion National Park	As part of the Preferred Alternative for the FRMP, we ask that the KFO designate specific roads and/or trails for mountain bike use.	The route identification process is flexible and adaptable to the construction of new routes. Appendix K, Travel Management/Route Designation Process, of the Draft RMP/EIS outlines the process to identify routes. The route/trail identification

Category Name	Commentor	Comment	Comment Summary Response
			process is an implementation level decision. The Draft RMP/EIS addresses motorized route identification. Future implementation level decisions could address route/trail identification for both motorized and non-motorized uses as explained in Appendix K.
Vegetation	ECOS Consulting	What are these treatments? The BLM must provide a list of proposed treatments, a detailed description of them, and the direct , indirect, and cumulative impacts that they entail.	The RMP sets the goals and objectives for prioritizing vegetation treatments. The planning handbook (BLM-H-1601-1) requires identifying desired outcomes for vegetative resources, including the desired mix of vegetative types, structural stages, and landscape and riparian functions. Implementation actions for vegetation treatments include identification of site-specific vegetation management practices such as vegetation treatments, or manipulation methods (including fuels treatments) to achieve desired plant communities. Site-specific NEPA analysis would occur prior to performing vegetation treatments. This would give the public a chance to comment on each individual treatment project as it is proposed.
Vegetation	ECOS Consulting	The BLM must show an analysis of why particular habitats have become degraded, and provide maps of the locations of degraded areas and proposed "vegetation treatments".	Ecological sites (habitats) that may be lacking desired functionality (i.e. pinyon-juniper encroachment, cheat grass) are generally a result of the interaction of complex, multifaceted, and largely historical issues. These interactions will be analyzed with site-specific NEPA prior to implementation. Section 3.2.5 of Chapter 3 of the Draft RMP/EIS includes a summary of the functioning condition of upland ecological sites and a vegetation departure from historic and estimated disturbance regimes.
Vegetation	ECOS Consulting	Casting the vague term "vegetation treatments" as the remedy to most of the impacts of proposed management actions is arbitrary, and in direct violation ofNEPA, and must not be used in this Kanab DRMP/DEIS.	Ecological sites (habitats) that may be lacking desired functionality (i.e. pinyon-juniper encroachment, cheat grass) are generally a result of the interaction of complex, multifaceted, and largely historical issues. These interactions will be analyzed with site-specific NEPA prior to implementation. Section 3.2.5 of Chapter 3 of the Draft RMP/EIS includes a summary of the functioning condition of upland ecological sites and a vegetation departure from historic and estimated disturbance regimes.
Vegetation	ECOS Consulting	The BLM is proposing to manage the resources by “vegetation treatment” of an average of 22,300 acres a year, or over 88% of the total area of the decision area in the next 20 years. This appears to be an arbitrary and excessive figure for which no basis is provided in the Draft RMP/EIS.	The management action to perform vegetation treatments on an average of 22,300 acres a year is designed to give BLM management flexibility in performing vegetation treatments. As stated in on page 2-42 of Alternative B Chapter 2 of the Draft RMP/EIS, the treatment of 22,300 acres a year is the maximum average amount of acres that would potentially be treated per year. This average is based on the ecological threshold that the vegetation communities are adapted to based on the research described in Chapter 3 of the Draft RMP/EIS. This research is summarized in Table 3-8 which identifies the thresholds of disturbance for the 20 year planning window for each vegetation type under both frequent and infrequent disturbance regimes.
Vegetation	ECOS Consulting	Vegetation treatments over 22,300 acres a year is excessive and over the life of this management plan would cover the whole Decision Area. This is intensive management at its worst because of the long-term negative impacts to soils	The management action to perform vegetation treatments on an average of 22,300 acres a year is designed to give BLM management flexibility in performing vegetation treatments. As stated in on page 2-42 of Alternative B Chapter 2 of the

Category Name	Commentor	Comment	Comment Summary Response
		(destruction of BSC's and compaction) and potential natural vegetation communities.	Draft RMP/EIS, the treatment of 22,300 acres a year is the maximum average amount of acres that would potentially be treated per year. This average is based on the ecological threshold that the vegetation communities are adapted to based on the research described in Chapter 3 of the Draft RMP/EIS. This research is summarized in Table 3-8 which identifies the thresholds of disturbance for the 20 year planning window for each vegetation type under both frequent and infrequent disturbance regimes.
Vegetation	John Veranth	Section 3.2.5 Regarding Non-native and Invasive Plants, there is inadequate attention paid to this issue throughout the RMP specifically in regard to effects of motorized recreation surface disturbance and grazing. Eradication efforts are the only way to deal with invasive plants. An aggressive program to control Russian olive, tamarisk, and other non-native invasive plants needs to be part of all alternatives. Active invasive plant control programs in Glen Canyon NRA and in GSENM will benefit from upwind / upstream control on Kanab RMP mananaged lands. This is only indirectly addressed in the listed alternatives as part of the vegetative treatments.	The Draft RMP/EIS Chapter 2 (pages 2-9 and 2-41) addresses the control of noxious weeds and invasive species. Site specific weed control actions are implementation-level decisions. The impacts that implementing the various alternatives will have on noxious weeds and invasive species (e.g., motorized recreation) is addressed in Chapter 4 of the Draft RMP/EIS.
Vegetation	Laura Welp	With this in mind, I recommend that the plan not put minimum acreages for restoration in the plan alternatives. As recent history has shown on the Grand Staircase Escalante National Monument, putting minimal acreages in the plan and projecting that you'll get X number of acres done in your annual objectives puts pressure on the BLM to implement projects when it might be better to wait, or re-design a project to do fewer acres.	The management action to perform vegetation treatments on an average of 22,300 acres a year is designed to give BLM management flexibility in performing vegetation treatments. As stated in on page 2-42 of Alternative B Chapter 2 of the Draft RMP/EIS, the treatment of 22,300 acres a year is the maximum average amount of acres that would potentially be treated per year. This average is based on the ecological threshold that the vegetation communities are adapted to based on the research described in Chapter 3 of the Draft RMP/EIS. This research is summarized in Table 3-8 which identifies the thresholds of disturbance for the 20 year planning window for each vegetation type under both frequent and infrequent disturbance regimes.
Vegetation	Merlin Esplin	Page 2-9 discloses that" ... preventing net loss of properly functioning sagebrush steppe habitat" is one of the objectives listed under vegetation. What is meant by this statement? Do you intend to try to have more sagebrush? Do you want pure stands of sagebrush, or un-evenaged stands, etc.? Perhaps the answer to my question is on page 217?	The objective is addressed on page 2-17 of the Draft RMP/EIS, in relation to the desired wildland fire condition for the sagebrush steppe. Additionally, page 2-42 addresses how future implementation projects would achieve this objective.
Vegetation	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-42, Section 2.4.1, Vegetation Restoration Treatments (first row): Under the preferred alternative, up to 80% of the total acres would be treated over the life of the plan (4% x 20 years). This time frame (20 years) may not allow sufficient time for vegetative communities to develop a full range of age classes and diversity, depending in part on the habitat type. This is especially true for long-lived species and for maintaining old growth. Consider removing the minimum requirement for vegetation treatments and allowing managers to implement appropriate acreages given habitat and climatic circumstances.	The management action to perform vegetation treatments on an average of 22,300 acres a year is designed to give BLM management flexibility in performing vegetation treatments. As stated in on page 2-42 of Alternative B Chapter 2 of the Draft RMP/EIS, the treatment of 22,300 acres a year is the maximum average amount of acres that would potentially be treated per year. This average is based on the ecological threshold that the vegetation communities are adapted to based on the research described in Chapter 3 of the Draft RMP/EIS. This research is summarized in Table 3-8 which identifies the thresholds of disturbance for the 20 year planning window for each vegetation type under both frequent and infrequent disturbance regimes.

Category Name	Commentor	Comment	Comment Summary Response
Vegetation	U.S. Fish and Wildlife Service, Utah Field Office	Page 2-43, Section 2.4.1: Alternative B, consider adding the following factor: "Restore special status species habitats to achieve long-term conservation and recovery objectives."	The Proposed RMP/Final EIS was modified to include the proposed language.
Vegetation	Walter Fertig	Vegetation treatments: I think setting numeric goals of 51% or 76% or more of lands at a state of "potential natural community" is an unrealistic management expectation. Potential natural community is essentially the "climax" state for a specific vegetation type and is more of an abstraction than a biological/ecological reality. A better (and more realistic) goal would be to manage BLM lands to have a mix of seral states - including early, mid, and late successional and PNC conditions. This would allow for the maximum diversity of wildlife and plants, provide a mixture of habitats for forage and cover, and improve fire/fuel management. The BLM should develop vegetation management plans to ensure this range of natural variability using existing grazing allotment boundaries, or develop vegetation management zones analogous to those proposed for recreation management.	The Draft RMP/EIS was changed on page 2-38 to include the following language on the rehabilitation decisions: "…unless site specific management objectives for other resources dictate otherwise (e.g., special status species adapted to 0-25% of PNC)."
Visual Resources	Brent Gardner	In Kanab Creek Canyon, approximately 2 to 3 miles North of Kanab on the East and West sides of Highway 89, water is derived from the Navajo Sandstone formation. These areas, where underground water resources are being developed, are classified as a Class III visual resource in Alternative B and Class I, II, and III in Alternatives C & D. This would be too restrictive for water development with its associated wells, access roads, and power lines. Alternative A, with its class IV designation, is preferred in this area.	This area would be VRM Class III in the Proposed RMP. VRM Class III would not preclude underground water resources being developed in this area. VRM Class III would have certain stipulations to mitigate visual impacts (e.g., placement of facilities, coloration, shape). The stipulations would be considered on a site-specific and case-by-case basis.
Visual Resources	Bryce Canyon National Park	The scenic values in and around Bryce Canyon National Parks is well known and is a primary park purpose. We believe that the appropriate Visual Resource Management objective in the Resource Management Plan in the vicinity of Bryce Canyon National Park should be VRM Class I, or "To preserve the existing character of the landscape. The level of change to the characteristic landscape should be very low and must not attract attention." The VRM objective should be no less than similar BLM-managed National Monument lands near Bryce Canyon with a VRM Class II, where the objective is "...to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. And changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape."	The Draft RMP/EIS provides a reasonable range of alternatives for VRM classifications in the parcels directly adjacent to Bryce Canyon National Park. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives in the vicinity of the park for VRM classifications, as well as for other resources and uses, include restrictions on surface disturbing activities and resource uses to address the issues raised.
Visual Resources	David Armbruster	There is no clear definition of the Visual Resources Management (VRM) in the DEIS. The DEIS states that "To the extent practicable, bring existing visual contrasts into VRM Class conformance as the opportunity arises." This statement is far too vague and subjective to be useful. I believe this language should be eliminated unless the specific Management Action to be done is defined.	The definition of visual resource management is on Page G-20 of the Draft RMP/EIS.
Visual Resources	James & Lorna Sills	Visual Resources Management Classes (VRM) The DEIS page 2-58 states" To	The definition of visual resource management is on Page G-20 of the Draft

Category Name	Commentor	Comment	Comment Summary Response
		the extent practicable, bring existing visual contrasts into VRM Class conformance as the opportunity arises. What is meant by "To the extent practicable"? This is too vague and subjective regarding what the Management Action is. Unless the Management Actions are properly defined, we are opposed to the designation of VRM Classes as shown in Alternate B.	RMP/EIS.
Visual Resources	PacifiCorp	The following statement is included in Appendix A, Page, 5 Reducing Impacts to Visual Resource Management Class II and III Areas Bullet 4: "paint all above ground structures". This statement contradicts the statement in Chapter 2, Section 2.4.1, Lands and Reality Table where it states "Construct power lines using non-reflective conductor. Towers would be constructed using non-reflective material".	Best management practices (BMP) are those land and resource management techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts and negative environmental impacts from management actions. BMPs can include structural and nonstructural controls, specific operations, and maintenance procedures. BMPs can be applied before, during, and after activities to reduce or eliminate negative environmental impacts. BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the Resource Management Plan (RMP). The best practices and mitigation measures for a particular site are evaluated through the site-specific National Environmental Policy Act process and vary to accommodate unique, site-specific conditions and local resource conditions.
Visual Resources	SUWA	The Kanab Field Office should ensure that scenic value is a resource that will be conserved and must establish clear management direction describing areas inventoried and possessing high scenic importance with clearly defined objectives that limit surface disturbance within important viewsheds.	The BLM has designated VRM management for the entire planning area within the DRMP/EIS. The scenic values of the planning area are placed in appropriate management classes by alternative.
Water Resources	Barry Clarkson Clarkson Draper & Beckstrom, LLC	A third issue which was not addressed in any way in the RMP is that of water rights and access to points of diversion. The fact is that there are many water rights which exist on the public lands in question. The point of diversion of several water rights also lie within the affected parcels of public land. Yet, the RMP makes no mention whatsoever of access points and use by those who hold said water rights and/or points of diversion. In order for a full and accurate assessment of the true impacts of the RMP the issue of water rights must be addressed. A map needs to be included which shows the existence of any and all water rights and/or points of diversion located upon the public lands. Said map should also include authorized routes to access and to use the water rights identified.	BLM is obligated by law to honor valid, existing rights. Similarly, holders of valid, existing rights are obligated to honor federal laws regarding the use of federal lands for the exercise of those rights. BLM does not foresee frequent situations in which BLM's obligations under federal law would cause the agency to take actions that would prevent the holders from fully exercising their valid existing rights. BLM works diligently with the owners of valid, existing rights to prevent such situations from occurring. If the holder of a valid, existing right believes the BLM has taken an action that prevents the exercise of that right, the proper venue for determining equitable compensation or mitigation is in a court of valid jurisdiction, not within the context of a land use plan.
Water Resources	ECOS Consulting	The results of past monitoring, showing trends, must be presented in order for the public to determine if these areas are being properly managed, and if not, what mitigation needs to be done to improve conditions.	The water quality monitoring data from the Utah Division of Water Quality was used in the Draft RMP/EIS. The information can be found on the STORET web page at http://ww.epa.gov/storet/dw_home.html. Chapter 3 of the Draft RMP/EIS provides the baseline conditions and trends of the decision area. This chapter is a summary of the data that has been collected by BLM. Additional information can be found in the administrative record, Analysis of the Management Situation, and Kanab Field Office files. There is no legal or regulatory requirement to provide monitoring/ evaluation/ feedback reports in the

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			Draft RMP/EIS.
Water Resources	ECOS Consulting	It is highly recommended that the BLM take the time to complete WPM's for at least the major watersheds within the Kanab Decision Area before this Kanab DRMP is finalized.	The Draft RMP/EIS chapter 3 section 3.2.4 identifies that there is one completed WMP (Upper Sevier Watershed Management Plan) and one underway on the Virgin River Watershed. Since the Draft RMP/EIS was published, the Virgin River Watershed Management Plan has been completed. The page 3-15 of the Draft RMP/EIS was modified to include the updated information. Watershed Management Plans are interagency plans; preparation of these plans are not required for the BLM to complete its land use planning process and are out of the scope of this NEPA document.
Water Resources	ECOS Consulting	Have there been any peer-reviewed reports? If so, this data should be summarized in this DRMP/EIS, so that the public can assess trends and whether or not the BLM is effectively managing this resource.	The Utah Division of Water Quality oversees groundwater monitoring. Groundwater quality monitoring is an implementation action and site-specific project-level program.
Water Resources	ECOS Consulting	In this DRMP/EIS, the BLM must show plans to be proactive in assessing water quality trends and identifying sources of water quality deterioration. Waiting for water bodies to be included on the 303(d) list is ineffective management and may be too late for many systems.	Chapter 2 of the Draft RMP/EIS presents decisions that would protect and benefit water quality. Additionally, the BLM Kanab Field Office has been and would continue to actively participate in the water quality monitoring program administered by the Utah Division of Water Quality with oversight from the EPA.
Water Resources	ECOS Consulting	This includes Cottonwood Canyon for the Fredonia water supply, and the watersheds serving Kanab, Panguitch, Hatch, Orderville, Escalante, Glendale, Tropic, Big Water, and Boulder. Are there any additional safeguards for these watersheds? If so, what are they, and they should be listed in this DRMP/EIS.	The Cottonwood Canyon ACEC in Alternative B and Alternative C of the Draft RMP/EIS provides protection for the Cottonwood Canyon and the Fredonia culinary water system. There are oil and gas leasing stipulations to protect the Kanab culinary water supply and watershed. The RMP provides management actions to continue to work with local communities to develop and protect culinary water sources.
Water Resources	Five County Association of Governments	These are valid existing rights held by private citizens or corporations. Access to these valid existing rights should not be constrained by administrative use designations that allow use only by federal employees. Holders of valid state water rights should be allowed access.	BLM is obligated by law to honor valid, existing rights. Similarly, holders of valid, existing rights are obligated to honor federal laws regarding the use of federal lands for the exercise of those rights. BLM does not foresee frequent situations in which BLM's obligations under federal law would cause the agency to take actions that would prevent the holders from fully exercising their valid existing rights. BLM works diligently with the owners of valid, existing rights to prevent such situations from occurring. If the holder of a valid, existing right believes the BLM has taken an action that prevents the exercise of that right, the proper venue for determining equitable compensation or mitigation is in a court of valid jurisdiction, not within the context of a land use plan.
Water Resources	L. Edward Robbins Kane County Water Conservancy District	While a good number of these are accessed by roads which would not be affected by any alternative under the RMP, there are certainly many whose primary access is by way of roads which are addressed by one or more of the alternatives considered under the RMP, and again, we are unable to determine from the RMP the extent to which water-related access was considered, if at all, in evaluating the alternatives under the RMP.	There are exclusions based on administrative and official use. The exclusions are defined in 43 CFR 8340.0-5 and would include water-related access to areas such as diversion structures and spring developments.
Water Resources	Laura Welp	However, I'm confused that the area around Zion National Park has no such restrictions, although that area is within the watershed for the park and for the town of Springdale. This seems inconsistent. Watersheds providing water for all	Kanab and Fredonia specifically requested that BLM manage the public lands around their water systems. Springdale has not requested BLM to manage Kanab Field Office lands to protect their water systems. This was not raised as an issue

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		towns in the management area should have the same restrictions.	during the public scoping period.
Water Resources	Mark Sterkel	A concievable end result of escalating OHV abuse in the Lake Powell watershed, not addressed in DRMP, is the increase in siltation that results from all the erosion from all those machines churning in & out of formerly unimpacted & remote canyons and drainages. Lake Powell will fill up with sediment faster, if the BLM doesn't get control of and manage OHV use shouldn't burec be concerned?	BLM has developed management prescriptions based on the resource needs. During the process, BLM has made the assumption that users will comply with the rules in affect. In addition, BLM is committed to contiuing to develop partnerships with organizations and user groups to continue monitoring and patroling of high-use areas and these efforts may enhance BLM's law enforcement capabilities.
Water Resources	Merlin Esplin	Another objective under the same heading is to "Ensure water availability for multiple-use management and functioning, healthy riparian and upland systems." What do you mean by this and where will you get the water rights, considering BLM has no way to put the water to "beneficial use" as required by state law to hold water rights?	The federal government has delegated the authority to allocate water within state boundaries to state governments. This means that even though BLM is a federal agency, it must seek water rights from state governments to obtain and provide water for BLM uses (e.g., livestock watering, recreation).
Water Resources	Merlin Esplin	Under Water Resources on page 2-37, I believe some statement about working with the State of Utah on these issues would be appropriate since the state has the principle responsibility to protect water quality, etc. as it relates to the division of Oil, Gas, and Mining.	As stated on page 3-15 of the Draft RMP/EIS, BLM recognizes that the State of Utah administers the water rights in Utah. Additionally, the BLM Kanab Field Office has been and would continue to actively participate in the water quality monitoring program administered by the Utah Division of Water Quality with oversight from the EPA.
Water Resources	Norris Brown Kanab Irrigation Company	The areas north of Kanab City, involving all of the Kanab Creek drainage has had a serious erosion problem that impacts the Kanab City. The Kanab Irrigation Company is the major stock holder in the Kanab Creek drainage and we need access to maintain our water right of ways. It will also effect UDOT road highway 89, sportsman and livestock permits. The NRCS (soil conservation) have been cooperative with the Kanab Irrigation company and KCWCD to establish a reeseding project to reduce the erosion and silt in the Kanab Creek and stabilize the water supply. We feel that now is not the time to close down the access to these areas of Kane County, but to join and cooperate with local and national agencies to improve and restore these vital resources of water and range management. Limiting access will severely hurt managing our water right of ways.	There are exclusions based on administrative and official use. The exclusions are defined in 43 CFR 8340.0-5 and would include water-related access to areas such as diversion structures and spring developments.
Water Resources	Susan Hand	Oil and Gas Leasing I appreciate the more restrictive guidelines for oil and gas leasing in the vicinity of Kanab as imposed by Alternative B. This is especially important to protect our community watershed. It would seem that the watershed for Zion National Park and the town of Springdale--indeed any community watershed--are equally deserving of protection.	Kanab and Fredonia specifically requested that BLM manage the public lands around their water systems. Springdale has not requested BLM to manage Kanab Field Office lands to protect their water systems. This was not raised as an issue during the public scoping period.
Water Resources	Western Watersheds Project, Inc.	BLM in relying on the State of Utah to list streams in its TMDL process, is abrogating its responsibility to manage so that water quality standards are met. A copy of thatJ vJfirT review is included as Appendix 3.	Chapter 2 of the Draft RMP/EIS presents decisions that would protect and benefit water quality. Additionally, the BLM Kanab Field Office has been and would continue to actively participate in the water quality monitoring program administered by the Utah Division of Water Quality with oversight from the EPA.
Wild and Scenic Rivers	BLM - Arizona Strip Field Office	Appendix G, Wild and Scenic Rivers, Pages AG-36 and 37 This section on the Paria River Wild and Scenic River status fails to mention the recommended Wild and Scenic River status for this river in either Grand Staircase-Escalante National Monument or in Vermilion Cliffs National Monument.	This is addressed on page 2-105 in Chapter 2 of the Draft RMP/EIS.

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Wild and Scenic Rivers	John Veranth	Regarding Wild and Scenic river segments the segments listed in Alternative C all are appropriate. Appendix G, I disagree with the statement that the geologic formations in the North Fork of the Virgin River, East Fork of Virgin River, Orderville Canyon etc are not rare or unique. The fact that the same geologic formation occurs elsewere in the area does not address the specifics of a canyon with Class A scenery.	Appendix G describes the process and authority for the Wild and Scenic Rivers Study.
Wild and Scenic Rivers	L. Edward Robbins Kane County Water Conservancy District	However, the District would add that there is no adequate factual basis on which long-term or permanent management of any of the proposed river segments could give rise to a federal reserved water right, and no legal basis on which any river segment upgradient from Zion National Park could be found to carry any federal reserved water. The District is a signer of the 1996 Zion National Park Water Rights Settlement Agreement. This Agreement entirely settles the issue of federal reserved water rights with respect to all waters which are upgradient from Zion National Park. The District reiterates its earlier position that at least with respect to those waters which are upgradient from Zion National Park, the entire wild and scenic rivers process is flawed since the issues inherent in that process have already been settled contractually by the United States, the State of Utah, and other entities including the Kane County Water Conservancy District.	There is no effect on water rights or in-stream flows related to suitability findings made in a land use plan decision, barring Congressional action. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no affect on existing, valid water rights. Section 13 (b) of the Wild and Scenic River Act states that jurisdiction over waters is determined by established principles of law. In Utah, the State has jurisdiction over water. Although the Wild and Scenic Rivers Act implies a Federal reserved water right for designated rivers, it does not require or specify any amount, and instead establishes that only the minimum amount for purposes of the Act can be acquired. Because the State of Utah has jurisdiction over water, BLM would be required to adjudicate the right as would any other entity, by application through State processes. Thus, for congressionally designated rivers, BLM may assert a Federal reserved water right to appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. In practice, however, Federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values.
Wild and Scenic Rivers	Mark Sterkel	Page AG-8 shows Birch Creek, 5 miles west of Escalante, as not having potential (let alone existing) outstanding remarkable value. A quick field visit will indicate that Birch Creek is a recovering riparian area, functioning under risk. It is a stunning, stark, beautiful canyon & stream corridor, wth high brownish-yellow scuplpted & block cliffs, archaeo & paleo resources, year round stream flow & associated flora/fauna. Views of the Escalante Monocline and distant Henry Mtns. can be seen from the old-growth pinyon-juniper benches. Birch Creek is recovering from 150 yrs. of grazing abuse. The DRMP should protect it as WSR, or at least an ACEC.	Appendix G of the DRMP/DEIS details the steps undertaken in the eligibility review process including the identification of outstandingly remarkable values as well as the Suitability Considerations by eligible river segments. The BLM complied with all applicable Federal laws, regulations, and policies in the Wild and Scenic Rivers Study Process. The BLM is confident of the high-standard approach used to evaluate river segments and stands by its eligibility and suitability findings.
Wild and Scenic Rivers	Merlin Esplin	Page 2-3, 2-28, and elsewhere discuss the desire or apply "protective management" to seven river segments by recommending them to be included in the national Wild and Scenic Rivers system. Once again, I question why this is even needed or desired. Current policies and laws give ample authority to the protection of all resources along or near streams or anywhere on public lands.	Section 5(d) of the Wild and Scenic Rivers Act requires that Federal land management agencies make wild and scenic river considerations during land use planning. Two stages of review are involved. Eligibility is an inventory, solely involving river values. Suitability involves consideration of manageability and resource conflicts. As per BLM Manual 8351-Wild and Scenic Rivers-Policy and Program, Section .32C, all eligible rivers are considered in the EIS for the planning effort as to their suitability for congressional designation into the National Wild and Scenic Rivers System. With any suitability determination made in the ROD for the PRMP/FEIS, the free-flowing, outstandingly remarkable values, and

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			tentative classification of rivers would continue to be protected until Congress makes a decision on designation. Appendix G describes the process and authority for the Wild and Scenic Rivers Study.
Wild and Scenic Rivers	Merlin Esplin	In particular I question the Meadow Creek/Mineral Gulch segment. Man's influence certainly is limited, practically non-existent, except for a couple of short fence segments, however, I doubt these canyons meet the real intent of the congressional directive. I realize there are no diversions within the segment listed, however water is damned and diverted above the segment and water rarely flows through the segment.	Appendix G describes the process and authority for the Wild and Scenic Rivers Study.
Wild and Scenic Rivers	Merlin Esplin	Some of the river segments listed for inclusion in the National Wild and Scenic Rivers system flow through Zion National Park, which is very scenic. However, if one wishes to see a flagrant misinterpretation of the Wild and Scenic Rivers Act (WSR), look at the number of segments in Zion where "man's influence" is certainly more than "temporary". Numerous rock walls, trails, rip-rap of various sorts, and roads are the rule along the Virgin River - not the exception. Please follow the intent of the law when considering river segments to recommend for inclusion in the Wild and Scenic Rivers system.	Section 5(d) of the Wild and Scenic Rivers Act requires that Federal land management agencies make wild and scenic river considerations during land use planning. Two stages of review are involved. Eligibility is an inventory, solely involving river values. Suitability involves consideration of manageability and resource conflicts. As per BLM Manual 8351-Wild and Scenic Rivers-Policy and Program, Section .32C, all eligible rivers are considered in the EIS for the planning effort as to their suitability for congressional designation into the National Wild and Scenic Rivers System. With any suitability determination made in the ROD for the PRMP/FEIS, the free-flowing, outstandingly remarkable values, and tentative classification of rivers would continue to be protected until Congress makes a decision on designation. Appendix G describes the process and authority for the Wild and Scenic Rivers Study.
Wild and Scenic Rivers	SUWA	The East Fork of the Virgin River, through Parunuweap Canyon, has been found eligible with the classification of "wild" (Segment 37-40a). DRMP/EIS 2-104. The preferred alternative would downgrade this classification to "scenic," perhaps to allow the BLM to add some facilities along the primitive way through this section. However, this section is already within a WSA, and as such, should be managed to the IMP standard. SUWA urges the BLM to classify this section as "wild," which is appropriate within a WSA.	Appendix G of the Draft RMP/EIS (page AG-18) describes the rationale for classifying this segment as "scenic". Designation of this segment as a "wild" river segment could create conflict with use along the RS-2477 claimed routes.
Wild and Scenic Rivers	Utah Rivers Council	However, the Council respectfully disagrees with failing to include several rivers in that recommendation and with the classification of two segments in the preferred alternative. The Council supports all of the following rivers as suitable to become Wild and Scenic Rivers with the classifications listed: *North Fork Virgin River segment 48-49: Wild *North Fork Virgin River segment 46-47: Recreational *Orderville Gulch and Esplin Gulch: Wild *Meadow Creek and Mineral Gulch: Wild *East Fork Virgin River segment 36-37a: Scenic *East Fork Virgin River segment 371-41: Wild *Paria River: Wild *Kanab Creek segment 7-8: Wild *Kanab Creek segment 8-9: Wild *Kanab Creek segment 9-10: Scenic *Bob Creek: to be determined *Tiny Creek: to be determined	Appendix G of the Draft RMP/EIS details the steps undertaken in the eligibility review process including the identification of outstandingly remarkable values as well as the Suitability Considerations by eligible river segments. The BLM complied with all applicable Federal laws, regulations, and policies in the Wild and Scenic Rivers Study Process.
Wild and Scenic Rivers	Utah Rivers Council	The Council urges the Kanab Field Office to give these segments the classification that they were given in the Draft Evaluation Report, which is the same as that given in Alternative C on page 2-104 for segment 37-40a.	The BLM's wild and scenic rivers manual (BLM-M-8351 - (8351 – Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management), section .33(c) states, "Whenever an eligible river segment has

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			been tentatively classified, e.g., as wild, other appropriate alternatives may provide for designation at another classification level (scenic or recreational).” During the alternative preparation process, the BLM ID Team made a specific field trip to the East Fork Virgin River segments in August 2006 to review the initial findings of the inventory. Based on that field trip, the two inventoried segments were revised to be three segments. The East Fork Virgin River segment 36-37, which was originally classified as “scenic” was found to include more route crossings than were originally known. As a result, its tentative classification was adjusted to “recreational” to comply with BLM-M-8351 section .51(C). As the field trip continued along the entire extent of the route, it was found that the some routes came close to the river several times along the upper portion of the segment. As a result, the East Fork Virgin River segment 41-37 was separated into two segments, with segment 41-40a retaining the “wild” classification between the last route and the planning area boundary and segment 40a-37 being modified to “scenic” to comply with BLM-M-8351 sections .51(A) and .51(B).
Wild and Scenic Rivers	Utah Rivers Council	But then the Draft goes on to muddle the clear language of the Wild and Scenic Rivers Act by finding segment 37-40a of the East Fork Virgin River "wild" in alternative C and "scenic" in alternative B. Similarly, segment 36-37 of the East Fork Virgin River was found to be "scenic" in the Draft Evaluation Report and "recreational" respectively in Alternative B of the Draft RMP. All of these segments are downgraded in the preferred Alternative, Alternative C of the Draft RMP.	The BLM’s wild and scenic rivers manual (BLM-M-8351 - (8351 – Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management), section .33(c) states, “Whenever an eligible river segment has been tentatively classified, e.g., as wild, other appropriate alternatives may provide for designation at another classification level (scenic or recreational).” During the alternative preparation process, the BLM ID Team made a specific field trip to the East Fork Virgin River segments in August 2006 to review the initial findings of the inventory. Based on that field trip, the two inventoried segments were revised to be three segments. The East Fork Virgin River segment 36-37, which was originally classified as “scenic” was found to include more route crossings than were originally known. As a result, its tentative classification was adjusted to “recreational” to comply with BLM-M-8351 section .51(C). As the field trip continued along the entire extent of the route, it was found that the some routes came close to the river several times along the upper portion of the segment. As a result, the East Fork Virgin River segment 41-37 was separated into two segments, with segment 41-40a retaining the “wild” classification between the last route and the planning area boundary and segment 40a-37 being modified to “scenic” to comply with BLM-M-8351 sections .51(A) and .51(B).
Wild and Scenic Rivers	Utah Rivers Council	The tentative classification given to East Fork Virgin River segments 36 through 41 in the 2005 Draft Evaluation Report is based on the actual development and accessibility to the river at the time of the study. Thus, this is the classification that these segments should be given in the suitability determination. Downgrading the classification of these segments is not consistent with current development and simply opens them up to future threats that may negatively harm the outstanding values of these rivers.	The BLM’s wild and scenic rivers manual (BLM-M-8351 - (8351 – Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management), section .33(c) states, “Whenever an eligible river segment has been tentatively classified, e.g., as wild, other appropriate alternatives may provide for designation at another classification level (scenic or recreational).” During the alternative preparation process, the BLM ID Team made a specific field trip to the East Fork Virgin River segments in August 2006 to review the initial findings of the inventory. Based on that field trip, the two inventoried segments were revised to be three segments. The East Fork Virgin River segment 36-37,

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			which was originally classified as “scenic” was found to include more route crossings than were originally known. As a result, its tentative classification was adjusted to “recreational” to comply with BLM-M-8351 section .51(C). As the field trip continued along the entire extent of the route, it was found that the some routes came close to the river several times along the upper portion of the segment. As a result, the East Fork Virgin River segment 41-37 was separated into two segments, with segment 41-40a retaining the “wild” classification between the last route and the planning area boundary and segment 40a-37 being modified to “scenic” to comply with BLM-M-8351 sections .51(A) and .51(B).
Wild and Scenic Rivers	Utah Rivers Council	The Council requests that the Kanab Field Office respond to and incorporate all of the comments on the Draft Evaluation Report, and make those publicly available.	The BLM’s ID Team reviewed and considered any comments submitted during the review period for the Draft Evaluation Report for Wild and Scenic River Eligibility. The Draft RMP/EIS Appendix G documents the final eligibility review, including the integration of applicable public comments, as well as the suitability review. There is no legal or regulatory requirement for BLM to provide its responses to public comments on the Draft Evaluation Report for Wild and Scenic River Eligibility.
Wild and Scenic Rivers	Utah Rivers Council	Regardless of the Kanab Field Office's eventual or potential designations of river segments, the identification of all qualifying sections is required and should be completed objectively without predecisional influences. We kindly request that the Kanab Field Office properly revaluate the eligibility of those streams found ineligible in the 2005 Draft Evaluation Report, including but not limited to: North Fork Virgin River segment 46-47, Bob Creek, Tiny Creek, and all segments of Kanab Creek. Additionally, we request that the Kanab Field Office fully disclose the results of the revaluation to the public.	The BLM Kanab Field Office used the 1997 publication A Citizen’s Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council during the evaluation of rivers potentially eligible to become congressionally designated Wild and Scenic Rivers. This information aided in the identification of outstandingly remarkable values for various streams that BLM identified as eligible. In some cases, however, an interdisciplinary team of resource specialists disagreed with the information or, more often, the significance of the information. In these cases, a rationale is provided in Table AG-1 and AG-2 of the Draft RMP/EIS Appendix G. All streams in the decision area were given consideration for their potential designation as a Wild and Scenic River. Appendix G fully discloses the review and evaluation process for determining which are eligible and suitable for such designation.
Wild and Scenic Rivers	Utah Rivers Council	The Council requests that those streams dismissed from being evaluated for eligibility due to their being ephemeral be reconsidered in the evaluation based on this and a more appropriate evaluation of ORVs. These rivers are not limited to the following: *Fisher Canyon *Robinson Creek *Sink Valley Wash *Trail Canyon *Pugh Canyon *Maranger Canyon *Oak Canyon *Dairy Canyon *Dry Wash *Peterson Wash *Butler Wash *Bunting Canyon	All streams in the Kanab Field Office were given consideration for their potential designation as a Wild and Scenic River. Appendix G fully discloses the review and evaluation process for determining which are eligible and suitable for such designation. However, page 4 of the Draft RMP/EIS Appendix G quotes BLM Instruction Memorandum 2004-196, which states, “The segment should not be ephemeral (flow lasting only few days out of a year).”
Wild and Scenic Rivers	Utah Rivers Council	However, the Kanab Field Office did not follow this regarding the eligibility of segment 46-47 of the North Fork Virgin River. For example, in their evaluation of the North Fork Virgin River, when looking at ORVs, "Wildlife -Spotted Owl designated critical habitat is present; however, checkerboard ownership makes management difficult." Checkerboard ownership is not something that should be considered in the eligibility phase. Furthermore, this segment possesses spotted owl habitat, which means that this segment has a wildlife value.	Language in Table AG-2 from the Draft RMP/EIS Appendix G was clarified to better reflect the ID Team conclusions.

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Wild and Scenic Rivers	Utah Rivers Council	The Council concurs with the Kanab Field Office that all segments of the East Fork of the Virgin River are suitable to become a Wild and Scenic River. However, the Council respectfully disagrees with the Kanab Field Office regarding classification of the segments. The Council recommends the East Fork Virgin River be found suitable with the following classifications: *East Fork Virgin River segment 36-37a: Scenic *East Fork Virgin River segment 371-41: Wild	The BLM's wild and scenic rivers manual (BLM-M-8351 - (8351 – Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management), section .33(c) states, "Whenever an eligible river segment has been tentatively classified, e.g., as wild, other appropriate alternatives may provide for designation at another classification level (scenic or recreational)." During the alternative preparation process, the BLM ID Team made a specific field trip to the East Fork Virgin River segments in August 2006 to review the initial findings of the inventory. Based on that field trip, the two inventoried segments were revised to be three segments. The East Fork Virgin River segment 36-37, which was originally classified as "scenic" was found to include more route crossings than were originally known. As a result, its tentative classification was adjusted to "recreational" to comply with BLM-M-8351 section .51(C). As the field trip continued along the entire extent of the route, it was found that the some routes came close to the river several times along the upper portion of the segment. As a result, the East Fork Virgin River segment 41-37 was separated into two segments, with segment 41-40a retaining the "wild" classification between the last route and the planning area boundary and segment 40a-37 being modified to "scenic" to comply with BLM-M-8351 sections .51(A) and .51(B).
Wild and Scenic Rivers	Utah Rivers Council	This change in classification of segment 37-40a makes no sense based on the development and accessibility to the river. As stated in the Draft RMP, classification of a river segment is based on the type and degree of human development associated with the river and adjacent lands at the time of inventory.12	The BLM's wild and scenic rivers manual (BLM-M-8351 - (8351 – Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management), section .33(c) states, "Whenever an eligible river segment has been tentatively classified, e.g., as wild, other appropriate alternatives may provide for designation at another classification level (scenic or recreational)." During the alternative preparation process, the BLM ID Team made a specific field trip to the East Fork Virgin River segments in August 2006 to review the initial findings of the inventory. Based on that field trip, the two inventoried segments were revised to be three segments. The East Fork Virgin River segment 36-37, which was originally classified as "scenic" was found to include more route crossings than were originally known. As a result, its tentative classification was adjusted to "recreational" to comply with BLM-M-8351 section .51(C). As the field trip continued along the entire extent of the route, it was found that the some routes came close to the river several times along the upper portion of the segment. As a result, the East Fork Virgin River segment 41-37 was separated into two segments, with segment 41-40a retaining the "wild" classification between the last route and the planning area boundary and segment 40a-37 being modified to "scenic" to comply with BLM-M-8351 sections .51(A) and .51(B).
Wild and Scenic Rivers	Utah Rivers Council	Therefore, instead of downgrading the classification of the entire segment from Wild to Scenic it could be resegmented in order to better reflect the reality on the ground. The Council requests the E Fork Virgin River be resegmented from point 38 upstream to where the road leaves the corridor, point 37a, as Wild, then have the next part of the segment upstream to 37 as Scenic.	The BLM's wild and scenic rivers manual (BLM-M-8351 - (8351 – Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management), section .33(c) states, "Whenever an eligible river segment has been tentatively classified, e.g., as wild, other appropriate alternatives may provide for designation at another classification level (scenic or recreational)." During the alternative preparation process, the BLM ID Team made a specific field

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			trip to the East Fork Virgin River segments in August 2006 to review the initial findings of the inventory. Based on that field trip, the two inventoried segments were revised to be three segments. The East Fork Virgin River segment 36-37, which was originally classified as “scenic” was found to include more route crossings than were originally known. As a result, its tentative classification was adjusted to “recreational” to comply with BLM-M-8351 section .51(C). As the field trip continued along the entire extent of the route, it was found that the some routes came close to the river several times along the upper portion of the segment. As a result, the East Fork Virgin River segment 41-37 was separated into two segments, with segment 41-40a retaining the “wild” classification between the last route and the planning area boundary and segment 40a-37 being modified to “scenic” to comply with BLM-M-8351 sections .51(A) and .51(B).
Wild and Scenic Rivers	Utah Rivers Council	The preferred alternative proposes to designate a road along the East Fork of the Virgin River, specifically along segment 36-37a. This proposed road crosses the river numerous times during its course along the East Fork Virgin River.13 We request that this entire proposed road along the river corridor be closed in order to protect the outstanding values of the East Fork of the Virgin River.	The Draft RMP/EIS analyzes the commentor’s recommendation. The routes that interact with the East Fork Virgin River segment 36-37 are closed under Alternative C. Alternative C is an option for decision-maker to consider in preparing the Proposed RMP.
Wild and Scenic Rivers	Utah Rivers Council	Therefore, the Council requests that the Kanab Field Office close the proposed road that follows the East Fork of the Virgin River in order to be consistent with the intention of the Wild and Scenic Rivers Act and protect the values for which the East Fork Virgin River is being recommended as suitable to become a Wild and Scenic River. With the closure of the proposed road we request that the East Fork Virgin River be found suitable and classified as follows: *East Fork Virgin River segment 36-37a: Scenic *East Fork Virgin River segment 37a-41: Wild	The Draft RMP/EIS analyzes the commentor’s recommendation for closing the route. The routes that intersect with the East Fork Virgin River segment 36-37 are closed under Alternative C. Alternative C is an option decision-maker to consider in preparing the Proposed RMP. However, as noted in BLM-M-8351 section .51(c), “the basic distinctions between a “scenic” and a “recreational” river area are the…extent of shoreline development…” As described in the Draft RMP/EIS Appendix G, the East Fork Virgin River segment 36-37 has a route running along the entire segment, including several river crossings. While Alternative C would close the route, the physical disturbance associated with the shoreline development would remain for the life of the RMP, therefore the BLM’s ID Team determined the even with the route closure, the segment retained the qualities of a recreational classification.
Wild and Scenic Rivers	Utah Rivers Council	The Council reiterates the same concerns that we expressed in comments submitted to the Kanab Field Office on the Draft Evaluation Report in a letter dated January 27, 2006. The Council respectfully disagrees with the Kanab Field Office's determination that Kanab Creek is not eligible. The Council strongly recommends that the entire length of Kanab Creek be found eligible for wild and scenic status as classified below: *Segment 7-8 from the falls to the BLM boundary in the northeast corner in section 32- Wild *Segment 8-9 from the falls at T.40S., R.6W., Sec.35 to T.41S., R.6W., Sec.33 - Wild *Segment 9-10 - from point 9 to the Highway 89 crossing - Scenic	The BLM Kanab Field Office used the 1997 publication A Citizen’s Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council during the evaluation of rivers potentially eligible to become congressionally designated Wild and Scenic Rivers. This information aided in the identification of outstandingly remarkable values for various streams that BLM identified as eligible. In some cases, however, an interdisciplinary team of resource specialists disagreed with the information or, more often, the significance of the information. In these cases, a rationale is provided in Table AG-1 and AG-2 of the Draft RMP/EIS Appendix G. All streams in the decision area were given consideration for their potential designation as a Wild and Scenic River. Appendix G fully discloses the review and evaluation process for determining which are eligible and suitable for such designation.
Wilderness Study	Allen Gilberg	The proposed play area in the Moquith Mountain WSA would become a sacrifice	The OHV open area in the Moquith Mountain WSA has been designated for OHV

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Areas		area – and would damage that area irreparably. Non-motorized visitor use on BLM lands is larger – in visitor days – than are visitor days by ATVs and ORVs. But the damage created by motorized visitation is much, much greater.	use since during the initial WSA inventory in 1979-80. The OHV open area has been in use without impairing the wilderness characteristics for which it was inventoried.
Wilderness Study Areas	Charles and Nancy Bagley	The chart of WSA Management options, page 2-110, shows for your preferred Alternative B that 1100 acres of Moquith Mt WSA will be open to cross-country OHV use. This is an increase from current management (No Action) that allows 730 acres of such OHV use. Yet your Objectives for WSA management (2-30) are stated in the first sentence: "Manage WSA's in a manner that does not impair their suitability for designation as wilderness." Obviously, allowing 1100 acres of cross-country OHV use in a WSA will impair its suitability for wilderness designation!! Your plan fails to meet your stated objectives.	There is no intended change in the management of the OHV open area in the Moquith Mountain WSA. The acreage discrepancy is an GIS calculation error and has been corrected in the Proposed RMP/Final EIS. The correct acreage is 1,000 acres.
Wilderness Study Areas	Christopher Lish	I am extremely upset that the BLM's plan will allow 1,100 acres of the Moquith Mountain WSA to be used as an ORV recreation area, where vehicles would be allowed to travel anywhere on these lands which have otherwise been found suitable for wilderness designation - unnecessarily putting at risk the sensitive plant and invertebrate species that have been found in this area, as well as the wilderness values that the agency is charged to protect.	The OHV open area in the Moquith Mountain WSA has been designated for OHV use since during the initial WSA inventory in 1979-80. The OHV open area has been in use without impairing the wilderness characteristics for which it was inventoried.
Wilderness Study Areas	Connie Ball	It is noted in the RMP that there are incursions into Wilderness Study-Areas which the BLM is required under the law to protect as wilderness until Congress acts on those areas. Most notably there-are- proposed Of existing ATV trails into areas such as Moquith Mountain and Coral Pink Sand Dunes. Any ATV trails in these areas as well as areas of critical environmental concern must be protected to the fullest extent possible, and as required by law, and to a degree greater than your RMP calls for in any of the Alternates. It should also be noted that the BLM should have assessed the impact of ATV's on global warming and their impact on regional air quality. Certainly the Wilderness Study Areas are adversely affected by ATV emissions, plant destruction and erosion from soft tires cutting deeply into soil, and wildlife disturbance from the high decibel level of the engines. Again, these vehicles should not be allowed at all in all such areas.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Monitoring and law enforcement are issues beyond the scope of this land use plan. Chapter 4 describes impacts from the presence and use of OHV ways and routes in WSAs.
Wilderness Study Areas	Connie Ball	As a citizen of the area concerned about the welfare of the wildlife, including the protection of the Coral Pink Sand Dunes tiger beetle which is a candidate for Federal protection under the Endangered Species Act, which is threatened by ATV's, according to the State of Utah's Division of Wildlife Resources, I request that the BLM go beyond Alternative C in restricting ATV's t-o very small and already destroyed areas and to strictly enforce the candidate areas for Wilderness Study Areas as well as the existing Wilderness Study Areas, by disallowing all ATV traffic.	A range of alternatives was considered that include closing the BLM portion of the Coral Pink Sand Dunes area to OHV use in Alternative C to allowing for cross-country OHV use in Alternatives A, B, and D. The impacts to the Coral Pink Sand Dunes tiger beetle are noted in Chapter 4 of the Draft RMP/EIS.
Wilderness Study Areas	Jim & Bonnie Vann	It is my belief that there are several current areas with inappropriate Wilderness Study Area designations. I believe that these are either the result of previously flawed inventories, or an intentional act by the BLM to create de-facto wilderness in areas that clearly do not qualify. This thought would hold true as well for lands	The WSAs are managed according to the IMP until Congress acts to either designate these areas as Wilderness Areas or to release them from designation. As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field

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		with Wilderness Characteristic designations. I do not believe it is appropriate for the BLM to attempt to manage these lands as if they have already been approved by Congress as Wilderness Areas. Some of these areas would include Kanab Creek, Four Mile Creek, and Sheep Springs. There are numerous areas of both WSA and lands with Wilderness Characteristic that clearly have machine built roads on them prior to 1976 that a simple review of Kane County aerial maps will confirm.	inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Wilderness Study Areas	Land Use Volunteers of Kane County	The Kanab BLM has been unable to curb illegal ORV activity and resulting damage to wilderness quality lands within its jurisdiction; therefore, no designated routes should be placed within areas identified to be of wilderness quality by the 1999 BLM Wilderness Inventory or in existing Wilderness Study Areas.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Monitoring and enforcement are issues beyond the scope of this land use plan.
Wilderness Study Areas	Land Use Volunteers of Kane County	The current BLM inventory is inadequate and does not include or accurately map the distribution of many of the archeological, botanical, wildlife, cultural, and ecological resources present in WSA's or wilderness characteristic areas. Designating hundreds of miles of travel routes will impact these resources over time. Even if there are not designated routes in the WSA's and other wilderness characteristic areas, there will probably be extensive illegal travel by ORV's. This inventory needs to be completed before the final version of the RMP is approved , so that the BLM can monitor the impact of ORV's over time in these sensitive areas.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Monitoring and enforcement are issues beyond the scope of this land use plan.
Wilderness Study Areas	Land Use Volunteers of Kane County	Both the Kanab BLM and the Land Use Volunteers of Kane County have documented evidence of persistent and increasing damage being done to this WSA by OHVs. No designated motorized routes should be placed within the Moquith Mountain WSA.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Monitoring and law enforcement are issues beyond the scope of this land use plan. Chapter 4 describes impacts from the presence and use of OHV ways and routes in WSAs.
Wilderness Study Areas	Land Use Volunteers of Kane County	Given the wilderness quality of this land, and the laws governing the preservation of resources within a WSA, it is inappropriate to place designated transportation routes in the area. Both the Kanab BLM and the Land Use Volunteers of Kane County have documented evidence of persistent and increasing damage being done to WSA's by OHV's. No designated motorized routes should be placed within the Parunuweap WSA.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Monitoring and law enforcement are issues beyond the scope of this land use plan. Chapter 4 describes impacts from the presence and use of OHV ways and routes in WSAs.
Wilderness Study Areas	Laura Welp	I commend you for making the difficult decision to close some roads in the WSAs. However, there should be no designated routes in wilderness quality lands because they degrade the wilderness quality of those areas, which is contrary to the BLM's charge to maintain wilderness characteristics.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Chapter 4 describes impacts from the presence and use of OHV ways and routes in WSAs and non-WSA lands with wilderness characteristics.
Wilderness Study Areas	Laura Welp	However, as with other WSAs in the project area, there are roads open to OHV use throughout, which is incompatible with wilderness designation that Congress might make in the future. Activities in WSAs must create no new surface disturbance, but as the attached photos show, Sand Springs, Coral Pink Sand Dunes, and the Moquith Mountain Loop all show OHV damage that has not been	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Monitoring and enforcement are issues beyond the scope of this land use plan.

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		confined to designated areas.	
Wilderness Study Areas	Laura Welp	I understand that this is a popular campground and provides convenient OHV access to the dunes, but its proximity to the wilderness study area is problematic. These photos show OHV use within the WSA closed area, well within sight of signs indicating that the area is closed. I suggest moving the campground to a location with less impact to the WSA.	Moving the campground is an implementation level decision that will be address with development of a recreation activity plan for the SRMA.
Wilderness Study Areas	Lynn Hague	Alternative B is off-base in proposing an "open" area for ORVs on 1,100 acres within Moquith Mountain Wilderness Study Area in the Coral Pink Sand Dunes. Wilderness values should come first in the WSA. ORVs can romp in the Coral Pink Sand Dunes State Park, where 1,000 acres are already open to them.	A range of alternatives was considered that include closing the BLM portion of the Coral Pink Sand Dunes area to OHV use in Alternative C to allowing for cross-country OHV use in Alternatives A, B, and D. The impacts fro this decision are analyzed in Chapter 4 of the Draft RMP/EIS.
Wilderness Study Areas	Lynn Hague	We also urge BLM to close ORV routes that are degrading wilderness values within WSAs on the Moquith Mountain loop and on Canaan Mountain.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Monitoring and enforcement are issues beyond the scope of this land use plan.
Wilderness Study Areas	Ray and Sharon Wells	Paruunuweap WSA road closures: 1. West end of the main road leaving the state section to be closed was in fact a machine built road that had to have been built prior to the 1976 WSA proposal T0410S - R0090W Sec. 33,34,35 2. The southwest road, which doesn't even show on the work maps, to be closed south of the state section goes over slick rock down to an area suitable for parking then walking down towards the river to a unique petroglph panel T0420S - R0090W Sec. 11 3. The southeast road to be closed used to be a part of a connecting road that crosses the Virgin River and goes up the south side to what is called steep trail. T0420S - R0090W Sec. 12. All of the above roads were inventoried pre- 1976 by Kane County road department. Which leads me to believe that the WSA really should not qualify to even be a WSA. If I'm not mistaken WSA's were supposed to have wilderness characteristics before becoming a WSA, not developed into WSA's by closing existing roads after the fact. I also believe it states in managing WSA's, existing roads in a WSA are not to be closed just because they are in a WSA.	Inventoried ways within WSAs were identified during the original 1979-80 section 603 wilderness review. Modification of this inventory using the commentor's recommendation number 3 is beyond the scope of this land use plan. Recommendations 1 and 2 both address inventoried ways that were considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include recommendations 1 and 2 as identified ways open to OHV use.
Wilderness Study Areas	Ray and Sharon Wells	South of Virgin River - Parunuweap WSA 1. Rock Canyon road. The most western road on south side of the Virgin, to be closed from state section to the view point above the river and the Barracks. This is another Kane County pre 1976 inventoried road. It is approximately two miles from the proposed closure to the view point above the river. This is a view point that is frequently visited and closing the road two miles up from the view point would eliminate the use of this area from all but the few people willing and able to hike the distance. This would be managing the area for a select group of people, not the majority. T0420S - R0090W Sec. 11,14, 15 2. Steep trail, the short road on the south side of the river which is the south half of the road coming out of Poverty across to the sands. A short road offering a good view of the river, Barracks and Poverty. T0420S - R0080W Sec. 18	Inventoried ways within WSAs were identified during the original 1979-80 section 603 wilderness review. Modification of this inventory using the commentor's recommendation number 2 is beyond the scope of this land use plan. Recommendation 1 addresses an inventoried way that was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include recommendation 1 as an identified way open to OHV use.
Wilderness Study	Ray and Sharon Wells	Moquith WSA 1. Southeastern road leading to Lamb's point view area goes to	The commentor's first recommendation includes trails that cross the state line into

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Areas		and through Arizona boarder, to two beautiful view points, one being the Bee Hives, and overlook, from atop the Vermilion Cliffs into the Arizona Strip. The Bee Hives area is very interesting and the view fabulous. The road continues back into Utah, to Lambs Point. Another beautiful view toward Fredonia from above the Vermilion cliffs. Note, this road also does not appear on the BLM work maps! Few people drive there almost no one will ever walk there. What a loss, let alone, I was told that the BLM has evidence that this road was built in the 1950's by a Kanab resident, probably to access the area for a cattle operation. T0440S - R0080W Sec. 12 2. Hell Dive road closure east of the state section fairly steep and sandy leads to a turn around area,where a short steep walk takes you to a beautiful pictograph panel, along with a big row of rocks, that are filled with matatees. A very special place I would suggest leaving the road open to the turn around area then possibly an informative sign explaining the significance of the area. T 0430S - R0070W Sec. 28, 29	the Kaibab-Paiute reservation. The Kaibab Paiute tribe, in consultation with BLM, has requested that BLM not provide public access to their reservation. Recommendation 2 addresses an inventoried way that was considered in the range of alternatives in the Draft RMP/EIS. The Proposed RMP/EIS has been modified to include recommendation 2 as an identified way open to OHV use.
Wilderness Study Areas	Ray and Sharon Wells	After inventorying and photographing, I question how the Moquith and Parunuweap WSA's every managed to qualify as WSA's in the first place. There were too many roads and other improvements that must have been overlooked at the time by the BLM to have been able to set the areas aside as WSA's and trying to do it now in retrospect, to make these areas more suitable as WSA's is just wrong.	The WSAs are managed according to the IMP until Congress acts to either designate these areas as Wilderness Areas or to release them from designation. The Moquith and Parunuweap WSAs were identified during the original 1979-80 section 603 wilderness review. Modification of this inventory is beyond the scope of this land use plan.
Wilderness Study Areas	SUWA	We emphasize that continued motorized use in WSAs (i.e. "open" areas and on "ways" BLM proposes to designate as official ORV routes) can damage wilderness suitability and therefore should be prohibited in this DRMP under both the interim management policy and the ORV regulations.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Chapter 4 describes impacts from the presence and use of OHV ways and routes in WSAs.
Wilderness Study Areas	SUWA	The proposed "open" ORV designation within the sand dunes portion of the Moquith Mountain WSA is inimical to IMP management. BLM must account for soil, riparian, wildlife, vegetative, and T&E species impacts at the dunes which according to the IMP should cause the BLM to stop this use - not propose to legitimize it in the RMP. BLM must also take into account its own surveillance reports and other documentation regarding impacts to wilderness values in the WSA, and ensure that concerns which flow from those documents are addressed.	The IMP allows for open OHV use in sand dunes and continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Chapter 4 describes impacts from the presence and use of OHV ways and routes in WSAs and non-WSA lands with wilderness characteristics.
Wilderness Study Areas	SUWA	The DRMP/EIS provides for designation of "routes" in the WSAs. DRMP/EIS, p.2-43. In order to comply with the IMP, any designations should refer only to "ways," rather than routes.	The Proposed RMP/Final EIS has been revised to refer to ways instead of routes in WSAs.
Wilderness Study Areas	SUWA	These portions of the RMP set out an appropriate summary of the standards for managing WSAs and how those standards should apply to permitting continued use of ways in WSAs. However, the analysis and management approach set out in the RMP do not comply with these standards.	The RMP is in compliance with the IMP which allows for vehicle use on "existing ways and trails or within pre-FLPMA sand dune… areas" if they meet the non-impairment criteria. The range of alternatives does not identify additional vehicle ways or use off of the ways identified in the 1979-80 inventory. The impact analysis in Chapter 4 of the Draft RMP/EIS identifies short-term localized impacts to wilderness characteristics from use of these ways, but this use would not

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			disqualify these lands from wilderness consideration by Congress.
Wilderness Study Areas	SUWA	This conclusion is not supported and is contradicted by the analysis of impacts in the DRMP/EIS and accepted science. Further, there is no acknowledgment of the important benefits to biological or environmental characteristics from closing WSAs to ORV use in the RMP's description of management of WSAs.	The OHV open area in the Moquith Mountain WSA has been designated for OHV use since during the initial WSA inventory in 1979-80. The OHV open area has been in use without impairing the wilderness characteristics for which it was inventoried. Chapter 4 of the Draft RMP/EIS identifies the impacts to environmental and biological characteristics from closing areas to OHV use. These closures are the result of management decisions for other resources and resource uses, including WSAs.
Wilderness Study Areas	SUWA	Recommendations: Leaving any portion of WSAs open to cross-county ORV use violates the BLM's obligations under both the IMP and the ORV regulations to protect wilderness suitability. There should be no open areas in the WSAs.	The OHV open area in the Moquith Mountain WSA has been designated for OHV use since during the initial WSA inventory in 1979-80. The OHV open area has been in use without impairing the wilderness characteristics for which it was inventoried.
Wilderness Study Areas	SUWA	In order to ensure ongoing protection of the wilderness characteristics in the WSAs, the Preferred Alternative should provide for the WSAs to be managed to protect wilderness characteristics in the event that all or part of any WSA is released by Congress.	The WSAs are managed according to the IMP until Congress acts to either designate these areas as Wilderness Areas or to release them from designation. In the event Congress releases any WSA, in whole or in part, management will be re-evaluated on a case-by-case basis.
Wilderness Study Areas	Walter Fertig	Wilderness Study Areas: WSA management remains driven by needs to maintain wilderness characteristics until such time that Congress designates these areas as official Wilderness Areas, or releases them. These were areas BLM itself identified as having wilderness potential and qualified for Wilderness designation when they were selected. Developing travel corridors through these areas goes against the spirit of WSA management and would seem to put the BLM in violation of its own WSA policy. This needs to be reassessed before the final decision is made on the RMP.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Monitoring and enforcement are issues beyond the scope of this land use plan.
Wildlife and Fish	Bryant Shakespear Garkane Energy	Alternative B, C, D require the use of non-reflective wore (non-specular conductor). Projects using non-specular conductor have had a marked increase of avian collision with the conductor and its use may be counterproductive to the avian protection measures included as part of the draft RMP.	The Proposed RMP/Final EIS has been adjusted to require non-reflective wire on lines greater than 230 KV.
Wildlife and Fish	Carl Albrecht Garkane Energy	Alternative B, C, and D require the use of non-specular conductor). Projects using non-specular conductor have had a marked increase of avian collision with the conductor and its use may be couterproductive to the avian protection measures included as part of the Draft RMP.	The Proposed RMP/Final EIS has been adjusted to require non-reflective wire on lines greater than 230 KV.
Wildlife and Fish	ECOS Consulting	All of these activities will adversely affect migratory birds, yet there is no mention of the impacts of these activities on migratory birds. The BLM must fully analyze the impact of these activities on migratory bird habitat.	The Draft RMP/EIS considers migratory birds throughout the document. They are noted as a planning issue in chapter 1, they are described in chapter 3 section 3.2.7, including Table 3-14 in Chapter 3 of the Draft RMP/EIS identifies migratory bird species and their habitats. They are addressed in chapter 2 in both objectives and management actions. The impact analysis in Chapter 4 of the Draft RMP/EIS identifies impacts to these habitats in the vegetation, fish and wildlife, and special status species sections. Migratory birds and their habitat was one of the resources that was considered throughout the development of the Draft RMP/EIS, including the identification of routes.

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Wildlife and Fish	ECOS Consulting	The BLM must plan for the protection of migratory birds by listing and mapping important habitat types, and keeping designated OHV routes and other management activities to a minimum in these areas. Natural processes must be allowed in certain areas, unencumbered by management activities or treatments. None of this type of planning is evident in this document.	The Draft RMP/EIS considers migratory birds throughout the document. They are noted as a planning issue in chapter 1, they are described in chapter 3 section 3.2.7, including Table 3-14 in Chapter 3 of the Draft RMP/EIS identifies migratory bird species and their habitats. They are addressed in chapter 2 in both objectives and management actions. The impact analysis in Chapter 4 of the Draft RMP/EIS identifies impacts to these habitats in the vegetation, fish and wildlife, and special status species sections. Migratory birds and their habitat was one of the resources that was considered throughout the development of the Draft RMP/EIS, including the identification of routes.
Wildlife and Fish	ECOS Consulting	Page 4-75, 8th paragraph: Forest and woodland product harvest, cross-country and on-route OHV use, road construction, facility construction, mineral development and the construction of related facilities, and ROW construction all can individually have serious adverse impacts. The activities are of such intensity and seriousness that they should not be lumped together, but considered separately. Their impacts should be treated separately and then an analysis of cumulative impacts should follow. This is important because habitat loss, alteration, and fragmentation are the primary causes of fish and wildlife population loss throughout the country.	Based on the condition and trend of the resources presented in the Draft RMP/EIS chapter 3, the analysis identifies the anticipated impacts of the habitat alteration, fragmentation, and/or loss of wildlife habitat.
Wildlife and Fish	Merlin Esplin	On page 2-47 under Utah Prairie Dog, the Draft RMP uses the wording, "Allow introduction, ..." Please ensure that any and all introductions of any species are reviewed through the public process, and that permittees are notified directly.	The BLM is required to complete NEPA docuementation for all implementation actions.
Wildlife and Fish	Norman McKee	2 – 12: Fish & wildlife management actions should include a beaver habitat inventory, along with a recommendation to re-introduce beaver in appropriate areas.	The Draft RMP/EIS Chapter 2 (page 2-53) includes language that allows the "introduction, translocation, transplantation, restocking, augmentation, and re-establishment of native and naturalized fish and wildlife species in cooperation and collaboration with UDWR..." Habitat inventories are not precluded by any of the proposed alternatives, and could be considered during implementation of the RMP.
Wildlife and Fish	Norman McKee	2 – 15: The majority of bighorn sheep lambing occurs prior to April 15 to June 15, usually a month earlier.	Habitat for desert bighorn sheep in the Kanab decision area occurs adjacent to Zion National Park in the Parunuweap WSA. This habitat is higher in elevation than most of the Desert bighorn sheep habitat in the region. While Desert bighorn sheep lambing season can extend from January-June, “the lambing season for bighorn sheep in colder climates is more concentrated and most births occur in April-June” (Bighorn Institute, 2008).
Wildlife and Fish	Norman McKee	3 – 46: Does the Panguitch Valley pronghorn population also include the Sage Hen Hollow population? Maybe, should be clarified. The two populations are physically separated from each other.	The Proposed RMP/Final EIS has been adjusted to clarify the fact that there are two pronghon populations in the Panguitch Valley.
Wildlife and Fish	SUWA	Despite the accepted and readily available scientific study and methods, the Kanab DRMP/EIS fails to conduct a sufficiently detailed analysis of fragmentation, which impairs the consideration of impacts of the various alternatives and prevents an informed comparison.	Based on reasonably forseeable level of development for oil and gas, as well as for other potential land uses and proposed alternatives, the level of analysis for fragmentation contained the Draft RMP/EIS in sections 4.2.5 and 4.2.6 is sufficient to describe the anticiapted impacts.
Wildlife and Fish	SUWA	As in the discussion special status species, there is no analysis of the actual	Based on reasonably forseeable level of development for oil and gas, as well as

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		fragmentation of habitat that is likely to occur using standard metrics or a thorough discussion of individual species. While the data provided is relevant, it is not sufficient. Without this information, the BLM cannot fully assess the direct, indirect and cumulative impacts of the management alternatives, as required by NEPA.	for other potential land uses and proposed alternatives, the level of analysis for fragmentation contained the Draft RMP/EIS in sections 4.2.5 and 4.2.6 is sufficient to describe the anticiapted impacts.
Wildlife and Fish	SUWA	In order to comply with the requirements of NEPA to conduct a thorough analysis of impacts of the management alternatives and to facilitate meaningful public participation and review of the DRMP/EIS, the BLM must thoroughly analyze the specific impacts of habitat fragmentation on affected species and provide a comparison of the management alternatives, as described in detail above. This analysis should include the impacts of ORVs and motorized routes, as well as roads.	Based on reasonably forseeable level of development for oil and gas, as well as for other potential land uses and proposed alternatives, the level of analysis for fragmentation contained the Draft RMP/EIS in sections 4.2.5 and 4.2.6 is sufficient to describe the anticiapted impacts.
Wildlife and Fish	SUWA	The DRMP/EIS should be revised to give sufficient weight to the benefits to wildlife, including special status species, from managing areas to maintain wilderness characteristics, including by reducing fragmentation. The management alternatives, including the Preferred Alternative, should include managing more lands outside WSAs to maintain wilderness characteristics.	The Proposed RMP has been revised to include management of 27,770 acres of non-WSA lands with wilderness character.
Wildlife and Fish	Theodore Roosevelt Conservation Partnership	The Kanab DEIS fails to adequately address oil and gas development and how it can be conducted in a way that does not unnecessarily impact fish and wildlife and their habitats.	Please see Appendix C of the Draft RMP/EIS for surface stipulations applicable to oil and gas leasing and other surface-distrubing activities. Also, please see Section 4.2.6 for the discussion of impacts of mineral resource decisions on wildlife and fisheries resources.
Wildlife and Fish	Theodore Roosevelt Conservation Partnership	We recommend that all areas of crucial fish and wildlife habitats available for oil and gas leasing and without NSO stipulations should have upfront planning prior to leasing to ensure that subsequent developments will be conducted responsibly.	The Kanab Field Office will establish plans for mitigation, including detailed fish and wildlife monitoring and the use of adaptive managmenet strategies to prevent, minimize or mitigate impacts of oil and/or gas exploration and development for future parcels offered for leasing during the site specific NEPA stage for each proposed lease parcel.
Wildlife and Fish	Theodore Roosevelt Conservation Partnership	The DEIS fails to provide a commitment to adequate fund wildlife management, monitoring, and restoration for oil and gas development projects. In times of increasing pressure from energy development on our federal public lands, fish and wildlife management needs more funding, not less.	The impact analysis assumes that funding would be available to implement the land use plan. Additionally, the funding for the RMP will vary in the future based on national priorities, available workforce, etc.
Wildlife and Fish	Theodore Roosevelt Conservation Partnership	The BLM fails to show how it will work to maintain wildlife objectives set by the UT Division of Wildlife Resources (UT DWR). Any determination of areas available for leasing and the appropriate development of those leases should be done with careful consideration of wildlife management objectives set by the UT DWR.	The Draft RMP/EIS Section 2.2.1, on page 2-15 states that the BLM will "Work cooperatively with other agencies, such as UDWR or Utah Partners for Conservation and Development, to identify and manage habitat for non-listed fish and wildlife species." The status of the existing UDWR management plans, management objectives, and wildlife population trends in relation to the objectives is described in the Draft RMP/EIS Chapter 3 pages 3-45 through 3-51.
Wildlife and Fish	Western Watersheds Project, Inc.	Pronghorn protection stipulations within Chapter 2 page 2-50 identify May 15 to June 15 as protection periods during fawning. However, based on local phenology, protective periods are too late to protect spring forbs necessary for successful fawning and lactation. Authorization should require rest from livestock grazing which extend from March 15 to June 15 for adequate protection of forage	Based on local plant phenology, the timing stipulation is adequate to protect pronghorn habitat necessary for successful fawning and lactation.

Category Name	Commentor	Comment	Comment Summary Response
		cover and other habitat requirements.	
Wildlife and Fish	Western Watersheds Project, Inc.	There was no meaningful analysis of the benefits of roadless areas (WSA, Wilderness, potential, conservation/refugia, research natural areas) to wildlife, and how those benefits to wildlife will be diminished by the visual and sound presence of these machines across the landscape.	Section 4.2.5 and section 4.2.6 of Chapter 4 of the Draft RMP/EIS include this analysis.
Wildlife and Fish	Western Watersheds Project, Inc.	The same goes for protection of sage grouse nesting and brood rearing areas. Where are the criteria for sage grouse habitats as regards maintaining forb, grass and shrub canopy cover and height that are ecologically necessary? Where are important wildlife areas that support sensitive species or those listed or proposed for listing under the ESA.	As stated on page 2-14 of the Draft RMP/EIS, BLM would implement the Utah Division of Wildlife Resources Sage-Grouse Strategic Management Plan, BLM National Sage-Grouse Habitat Conservation Strategy, and recommendations from local sage-grouse working groups to protect, maintain, or enhance current Greater sage-grouse populations and habitat. These documents include recommendations for aiding in the management of sage-grouse habitats.