

**Table 5.13a. Comments Requiring a Change in the Document: Adequacy and Analysis**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
WSA Supplement	US EPA	G-6	47	Table 4-1, Disturbance Assumptions, page 4-3: The basis assumption is that surface disturbance can be reclaimed within one year after completion of operations. Soil conditions, annual precipitation, and presence or absence of invasive plant species may lengthen reclamation time significantly.	The sentence has been rewritten as follows:  Interim reclamation will occur on 0.9 acres of surface disturbance within 1 year after completion of operations.

**Table 5.13b. Comments Requiring a Change in the Document: Areas of Critical Environmental Concern**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	SD130	The analysis indicates that ACECs may benefit from "fire resources, soil and watershed actions, and vegetation resources (including riparian areas and woodlands)," yet be negatively affected by mineral activities and OHV use. No explanation is given for these statements. Vegetation, fire, and soil treatments may affect the appearance of the land as much as mineral development, yet the end result is healthier vegetation. The bias against mineral development is evident, because no mention is made concerning the balance of uses which results in the extraction of resources useful to society versus the potential benefits of the ACEC, and because the analysis fails to	The distinction between fire resources, soil, watershed, and vegetation management actions and minerals activity and OHV use is that changes to the character of the landscape, including visual appearance, for the former category of actions are of far shorter duration and more consistent with the management objectives of ACECs than those of the latter category of actions.  Also, see Response to Comment SD125-G-1.

**Table 5.13b. Comments Requiring a Change in the Document: Areas of Critical Environmental Concern**

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				recognize the effect of proper mineral mitigation measures upon the ultimate effect on the relevant and important values. The state requests the BLM revisit these superficial analyses, consider mitigation part of the determination of effect, and consider the balance of uses as required.	
Draft RMP/EIS	State of Utah	G-1	SD143	The discussion of the relevant and important values of the proposed Nine Mile Canyon ACEC is inadequate in that it does not provide an actual description of said values, but rather it offers merely a recitation of the regulatory requirements for the nature of those values. How are these values significant in a regional context? What specifically are the qualities to be protected and managed through the ACEC?	The inconsistencies in cited relevant and important resource values have been corrected. Appendix G contains the correct list of values.
Draft RMP/EIS	State of Utah	G-1	SD168	Section 3.14.2.1 on page 3-80 discusses the Coyote Basin ACEC. Black-footed ferrets were released in 1999 under 10j status designation. However, this section is vague on that point. It only mentions ferrets as being raised for release but does not mention that ferrets are already successfully reproducing in the wild. The document fails to mention that the UDWR is also cooperating with the Vernal BLM and Utah State University in continuing the research project relating to the recovery of black-footed ferrets.	Chapter 3 in the PRMP/FEIS has been revised to clarify 10j status of black-footed ferrets in Coyote Basin.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SD320 (JSD-60)	Please change this section to state:  "Manage to protect high value wetland, wildlife,	Table 2.1 (Special Designations – Areas of Critical Environmental Concern (ACECs)) of the PRMP/FEIS has been revised to implement the suggested change.

**Table 5.13b. Comments Requiring a Change in the Document: Areas of Critical Environmental Concern**

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				and plant habitat resources,"  On page 3- 79, Table 3.14.1, it is stated for Pariette Wetlands that this is "Special status bird and plant species' habitat, a wetlands ecosystem, Significant population of the federally threatened plant species Sclerocactus glaucus."	
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SD322 (JSD-62)	The section on "Currently Designated ACECs" states that the management relevance and importance criteria (which include plan fish, and wildlife resources) are detailed in Chapter 3 of the Diamond Mountain RMP and ROD. As Chapter 3 of the Diamond RMP and ROD document provides little discussion on ACECs, their management relevance and importance, this discussion needs to be fully presented and expanded within this current RMP/EIS.	The inconsistencies in cited relevant and important resource values have been corrected. Appendix G contains the correct list of values.
Draft RMP/EIS	UBAOG	G-22	SD32	VRM Classes 2 and 3 are proposed here without discussion of need and what they are intended to protect. Approximately one half of the ACEC is VRM Class 2 and the other half Class 3. Given the definition of VRM Class 2 which states: "A low level of change in landscape characteristics, and activities not attracting the attention of the casual observer," it appears this would prevent development of existing leases and also on future leasing. The impacts to oil & gas and other permittee's was not analyzed or disclosed. The impacts of a VRM II must be analyzed in Chapter 4 and reflected in reasonable foreseeable	Based on the analysis of and response to the public comments, BLM has changed the proposed VRM classes to be more consistent with overall management objectives.

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				development, and be analyzed to insure they are the least restrictive necessary. As written it implies that the area would be open to oil and gas leasing subject to standard lease terms or controlled surface use. Oil and gas leasing and development are two different things given the fact that much of this area is VRM II. Being able to develop a lease in the majority of the area described here is questionable at best and not analyzed.	
Draft RMP/EIS	UBAOG	G-22	SD38	When Alternative D includes an ACEC designation in the Lower Green River Expansion of only 1,700 acres less than Alternatives A and C, how could Alternative D "not have the benefits" described for Alternatives A and C? It should provide the same benefits but to a slightly lesser degree.	Chapter 4 in the PRMP/F EIS has been revised to indicate that Alternative D would have lesser benefit than Alternatives A, C, and E.
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-24	SD89	It is proposed to designate 98,000 acres in Nine Mile Canyon as an ACEC. As written the alternative proposed here fails to clearly show that the Lears Canyon ACEC is included in the Nine Mile Canyon ACEC proposed in Alternative C and D.	Table 2.1 (Special Designations – Areas of Critical Environment Concern (ACECs)) of the PRMP/FEIS has been revised to show that Lears Canyon ACEC is a separate and not part of the Nine Mile Canyon ACEC for all alternatives.
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-24	SD93	The DEIS fails to analyze management decisions [for the Nine Mile Canyon ACEC] to insure they are the least restrictive yet protect identified and substantiated values as required by EPCA.	Appendix G in the PRMP/FEIS has been revised to clarify the relevance and importance of the Nine Mile Canyon ACEC.
Draft RMP/EIS	J.C. Brewer	I-111	SD215 (SD-JJ)	Black-footed ferrets were introduced in Coyote Basin under 10-J status and do not require special protections. The population of prairie dogs is not being threatened by current	Section 3.14.2.1 in the PRMP/FEIS has been revised to clarify 10j status of black-footed ferrets in Coyote Basin.

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				activities. All other values listed under Alternative A, B or C can be achieved by other means. This proposed ACEC does not meet the test of Relevance under 43 CFR 1610.7-2. Drop from further consideration.	See Appendix G for additional information on the relevance and importance of this proposed ACEC.
Draft RMP/EIS	Questar	O-12	SD329 (LSD-4)	The DEIS does not contain sufficient information to explain why the Nine Mile Canyon Expansion ACEC was created and why this area is more restricted under Alternative A than under B or D. There is no explanation of the 'importance criteria' for this area.	The inconsistencies in cited relevant and important resource values have been corrected. Appendix G contains the correct list of values.
Draft RMP/EIS	IPAMS	O-14	SD329 (LSD-4)	The DEIS does not contain sufficient information to explain why the Nine Mile Canyon Expansion ACEC was created and why this area is more restricted under Alternative A than under B or D. There is no explanation of the 'importance criteria' for this area.	The inconsistencies in cited relevant and important resource values have been corrected. Appendix G contains the correct list of values.
Draft RMP/EIS	IPAMS	O-14	SD331 (LSD-6)	No support is given for the statement that the Coyote Basin ACEC provides a 'crucial habitat' for special species	Appendix G in the PRMP/FEIS has been expanded to include more information for the rationale behind proposed ACECs.
Draft RMP/EIS	EOG Resources	O-17	SD200 (SD-V)	Alternative A would designate acreage along the White and Green River corridors as ACECs to protect unique geologic and high-value riparian areas. With closures in large portions of this proposed ACECs, oil and gas development would be precluded from potentially thousands of acres; however, EOG is not sure about the specifics impacts as no mapping or description of the dividing line between the western and eastern parts is presented.	Figures 22-24 in the PRMP/FEIS have been revised to show the boundaries of both the old and current ACECs for the different alternatives.  A written description of the ACEC areas is described in Appendix G.
Draft	EOG	O-17	SD211	Under Alternative B, the Nine Mile Canyon area	See Response to Comment SD50-G-25.

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RMP/EIS	Resources		(SD-FF)	would continue under the current program. There are current and existing laws and procedures in place to protect cultural resource areas. Therefore, additional protection is unwarranted. The analysis needs to address the detrimental impacts that implementation of these alternatives would have on oil and gas development.	Chapter 4 in the PRMP/FEIS has been revised to clarify the anticipated impacts of special designations on minerals and energy development.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SD381 (ME-CCC)	Appendix K states that the 71,000-acre Bitter Creek ACEC is established to protect 71,000 acres containing pinyon pines. This acreage differs from the 68,834 acres designated as the potential Bitter Creek ACEC on page 3-81 of the draft RMP/EIS. Please correct.	The Proposed RMP/Final EIS has been revised to correct acreage amounts or rationale provided for the differences.
Draft RMP/EIS	Julander Energy	O-34	SD288 (JSD-32)	There is no discussion of white-tailed prairie dogs or black-footed ferrets in this appendix, though there is a lot of discussion of various spatial and seasonal restrictions for raptors. This is further evidence that the BLM is not proposing any special management for white-tailed prairie dogs and that ACECs are not justified.	Appendix K has been revised in the PRMP/FEIS to include additional prescriptions.
Draft RMP/EIS	Center for Native Ecosystems	O-38	SD260 (JSD-4)	Prescriptions for the Coyote Basin ACEC are vague. Noxious weeds would be controlled but the primary weed in this area is cheatgrass, and we are unaware of any effective control strategy. Natural fire regimes would be restored, but we are not sure how this will be possible since it is overrun with cheatgrass, which alters fire regimes and is often better able to out-compete natives after fire. Page 4-232 says prescribed burns would take place in	Table 2.1 (Special Designations – Areas of Critical Environmental Concern (ACECs)) has been revised to clarify the prescriptions for the Coyote Basin ACEC under the various alternatives.

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				desert shrublands, but also says fire won't take place in black-footed ferret habitat, which is confusing. The main special management that could benefit prairie dogs (the reason for ACEC designation) consists of "implementing actions to maintain or enhance...habitat". What ARE the actions? What about prohibiting actions that reduce habitat? Instead, BLM proposed to continue to lease habitat with standard lease terms, or perhaps with timing limitations, but does not spell out what the stipulations would be in place where.	
Draft RMP/EIS	Enduring Resources	O-40	SD177 (JPR-2) SD-Temp1	NEPA and BLM policy require that the BLM make available for public comment the information upon which the decision to designate ACECs were reached, including the underlying analysis for the proposed and existing.	Information on the evaluation and determination of ACEC designations was provided in Appendix G of the Draft RMP, which was available for public review and comment. The information in this appendix has been expanded in the PRMP/FEIS. Additional opportunities for public input were provided during the scoping process as well as the public comment period for the Vernal Supplement to the DRMP and EIS. Section 4.21.2.9 and Table 4.21.2 discuss ACECs.
Draft RMP/EIS	Utah Petroleum Association	O-42	SD305 (JSD-47)	The proposed Lower Green River ACEC Expansion fails to meet regulatory criteria of importance and relevance. There is no documentation in Chapters 3 or 4, or in Appendix G, that verifies that this area has "substantial significance due to qualities that make them fragile, sensitive, rare, irreplaceable exemplary and unique". Appendix G states that the significance of these importance resources	See Responses to Comments SD14-G-13,SD27-G-22.  Additional information has been added to Appendix G and Chapters 3 and 4 to clarify the proposed Lower Green River Expansion ACEC.

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				has been recognized (no citation given). Without such supporting documentation, this area should be eliminated from consideration as an ACEC. Figure 22 shows many areas of overlap in current and proposed ACECs. This is inconsistent with the text in the RMP, since the stated goal is not to re-propose or layer additional restriction onto the existing ACEC areas within the planning area.																					
Draft RMP/EIS	Utah Petroleum Association	O-42	SD306 (JSD-48)	<p>The RMP should include a table that clearly identifies the stipulations for each proposed ACEC under all the alternatives. The table should approximate the following:</p> <table border="1" data-bbox="732 818 1283 989"> <thead> <tr> <th></th> <th>Standard</th> <th>T&amp;CSU</th> <th>NSO</th> <th>closed</th> </tr> </thead> <tbody> <tr> <td>ACEC1</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>ACEC2</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>etc</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Standard	T&CSU	NSO	closed	ACEC1					ACEC2					etc					This information has been added to the Final EIS.
	Standard	T&CSU	NSO	closed																					
ACEC1																									
ACEC2																									
etc																									
Draft RMP/EIS	Utah Petroleum Association	O-42	SD309 (JSD-50b)	Appendix K states that the Bitter Creek ACEC is 71,000 acres. Page 3-81 says it is 68,834 acres. Please correct this contradiction.	The Proposed RMP/Final EIS has been revised to correct acreage amounts or rationale provided for the differences.																				
Draft RMP/EIS	Westport Oil and Gas Co.	O-44	SD296 (JSD-40)	Even if ACEC designation was supported, BLM has not provided the requisite legal or factual support for the management actions it has proposed. The draft RMP does not adequately describe the Coyote Basin management requirements, and the limited management descriptions provided are inappropriate and unnecessary for the protection of the white-tailed prairie dog in the White River corridor. The RMP fails to provide information as to	<p>See Responses to Comments SD27-G-22, SD8-G-9,</p> <p>The white-tailed prairie dog is considered a sensitive species under IM 2007-078 and BLM Manual 6840 provides guidance that does not allow actions that would lead to listing. In addition, the 1999 Black-footed Ferret Reintroduction Plan Amendment and those portions of the Cooperative Plan for the</p>																				

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				resource use limitations, particularly with respect to oil and gas production. The RMP indicates that the appendices list all the surface use stipulations in the Vernal Planning area. However, Appendix K does not contain any timing limitation stipulation or controlled surface use stipulations for white-tailed prairie dogs. BLM needs to address this.	Reintroduction and Management of Black-footed Ferret in Coyote Basin, Uintah County, Utah that are consistent with this plan amendment affords mitigation to the white-tailed prairie dog. Appendix K has been modified to incorporate mitigating measures for the white-tailed prairie dog.
ACEC NOA	The Wilderness Society	O-1	6	BLM did not recognize the economic benefits to be gained from designation of ACECs. In considering the designation of ACECs, BLM did not adequately recognize either the potential benefits to local economies from protecting these areas or the potential costs from permitting oil and gas and ORV use to continue at the expense of protecting special places. In fact, in discussing socioeconomic analysis, the Draft RMP/EIS did not discuss this aspect of ACEC designation at all. See, DEIS, Sections 3.12 and 4.12.	Information on the economics of designation of ACECs had been added to the Socioeconomic section of Chapter 4.
ACEC NOA	Uintah County Commission	G-2	6	The counties are concerned that the draft RMP is not specific about the sources and goals of many of the special management designations available to it, leading to the circular and non-responsive reasoning in the analysis. For example, on page 4-284, the impacts analysis for visual resources and special designations indicates that visual resources will be protected by designation of ACECs and Wild and Scenic River designations. This analysis proceeds under the general presumption that ACECs and WSR segments are "good" for visual resources, but fails to indicate the management prescriptions	The PRMP/FEIS has been revised to include the Proposed RMP that reflects the selection of management direction from all alternatives to mitigate impacts to resources  "Layering" is planning tool. 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

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			<p>which actually accomplish this goal. On page 4-280 under a discussion of recreation, the draft RMP indicates that the designation of Special Recreation Management Areas would benefit scenic quality by "limiting surface-disturbing activities". On the other hand, the explanation of management prescriptions for the proposed Bitter Creek ACEC indicates possible use of three of four existing VRM categories. Which designation - ACEC, WSR, SRMA or VRM management - is being proposed for the protection of visual resources? The VRM discussion mentions the others, while the ACEC discussion mentions the use of VRM classifications. This lack of clarity in proposed management prescriptions doesn't meet the requirements of full disclosure under the provisions of NEP A, and doesn't allow counties to determine whether or not the BLM is proposing duplicate prescriptions, contrary to the provisions of State law, and the BLM's Manual on designation of ACECs, as discussed above.</p>	<p>and use on every acre, but routinely manages many different values and uses on the same areas of public lands. The process of applying many individual program goals, objectives, and actions to the same area of public lands may be perceived as "layering". The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Inconsistent goals and objectives can lead to resource conflicts, failure to achieve the desired outcomes of a land-use plan, and litigation. Whether or not a particular form of management is restrictive depends upon a personal interest or desire to see that public lands are managed in a particular manner. Not all uses and values can be provided for on every acre. That is why land-use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified for resolution in the land-use plan. Layering of program decisions is not optional for BLM, but is required by the FLPMA and National BLM planning and program specific regulations.</p> <p>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</p>

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					<p>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.</p>
ACEC NOA	Uintah County Commission	G-2	2	<p>Similarly, on page 4-203, the draft RMP indicates the lack of designation of some potential ACECs may place the relevant and important values "at some risk of irreparable damage during the life of the plan". This statement is completely backward. BLM must make a determination that a threat of irreparable damage from some authorized multiple-use activity exists, and is directed toward the identified relevant and important value in order to complete the fundamental requirements for an ACEC.</p>	<p>The ACEC evaluation appendix (Appendix G) was modified, and a section added to Chapter 2 discussing threats to the relevant and important ACEC values; however, whether the threats currently exist does not preclude a potential ACEC from being considered in the action alternatives. All nominated areas, where the BLM has determined to have relevant and important values, are identified as potential ACECs and are addressed in the action alternatives. Threats to relevant and important values are likely to vary by alternative. The PRMP/FEIS was revised from the draft document to better address potential threats and impacts associated with each alternative.</p> <p>On August 27, 1980, the BLM promulgated final ACEC guidelines (45 Federal Register 57318) clarifying the term "protects" – "To defend or</p>

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					<p>guard against damage or loss to the important environmental resources of a potential or designated ACEC. This includes damage that can be restored over time and that which is irreparable. With regard to a natural hazard, protect means to prevent the loss of life or injury to people, or loss or damage to property." Thus, BLM is to consider the potential for both reparable and irreparable damage when protecting important historic, cultural, or scenic values; fish and wildlife resources; or other natural systems through ACEC designation. This interpretation is consistent with FLPMA's legislative history and implementing policy.</p> <p>Section 2 of the guidelines clarifies that ACECs are special places within the public lands. It states: "In addition to establishing in law such basic protective management policies that apply to all the public lands, Congress has said that 'management of national resource lands [public lands] is to include giving special attention to the protection of ACECs, for the purpose of ensuring that the most environmentally important and fragile lands will be given early attention and protection' (Senate Report 94-583, on FLPMA). Thus, the ACEC process is to be used to provide whatever special management is required to protect those environmental resources that are most important, i.e., those resources that make certain specific areas special places, endowed by nature or man with characteristics that set them apart. In addition, the ACEC process is to be</p>

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					used to protect human life and property from natural hazards."
ACEC NOA	IPAMS	B-3	12	We have also noted that the draft RMPEIS does not contain any discussion, in Chapter 4, Section 4.8 (Minerals and Energy Resources), on the effects of designation of new ACECs on mineral leasing and development. Since the impacts of the additional stipulations for ACECs would be exceptionally restrictive, a discussion of the impacts to mineral development from designation of new ACECs must be included in Chapter 4 of the RMP/EIS.	This information has been added to the Special Designations section of the PRMP.
ACEC NOA	IPAMS	B-3	11	The RMP should include a table (that shows the oil and gas leasing stipulations for each ACEC), similar to the one included below, that clearly identifies the stipulations for each proposed ACEC under all alternatives.	This information has been added to the Special Designations section of the PRMP.
ACEC NOA	IPAMS	B-3	10	Figure 22 (Special Designations – Alternative A) shows many areas of overlap in current and proposed ACECs. This is inconsistent with the text in the RMP since the stated goal is not to re-propose or layer additional restrictions onto the existing ACEC areas within the planning area.	The BLM has separate policies and guidelines, as well as criteria, for establishing ACECs and WSAs. These differing criteria make it possible that the same lands will qualify as both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies.  The values protected by WSA management prescriptions do not necessarily protect those values found relevant and important in ACEC evaluation, and vice versa. The relevant and important values of ACECs within or adjacent to

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					WSAs were noted in the ACEC Evaluation (Appendix I). The ACECs are evaluated and ranked based on the presence or absence of the stated relevant and important values. None of these values includes wilderness characteristics. Additionally, the management prescriptions for the ACECs is limited in scope to protect the relevant and important values, and the BLM maintains that the size of the ACEC areas is appropriate for protection of the relevant and important values identified. The Proposed RMP has been inserted into the PRMP/FEIS to more easily understand differences between the Propose Plan and the alternatives analyzed.
ACEC NOA	IPAMS	B-3	9	The 'importance criteria" given in the draft RMP for the Lower Green River Expansion ACEC state that the relevant values "have substantial significance due to qualities that make them fragile, sensitive, rare, irreplaceable, exemplary, and unique." There is no documentation in Chapter 3, 4 and Appendix G, of any documents that verify these qualities. Appendix G also states that the significance of these important resources has been recognized (no citation is given). Without any supporting documentation for these statements in the draft RMP, therefore the Lower Green River Expansion ACEC should be eliminated from consideration as an ACEC.	The Proposed RMP did not designate the nominated Lower Green River Expansion area as an ACEC. The Nine Mile Canyon Expansion was not designated. Chapter 4 has been revised to include protective measures that protect relevant and important resources.
ACEC NOA	IPAMS	B-3	7	The 'importance criteria" given in the draft RMP for the Nine Mile Canyon Expansion ACEC state that the relevant values "have	The Proposed RMP continues the designation of the existing Nine Mile Canyon ACEC that was carried forward from the Diamond Mountain

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				substantial significance due to qualities that make them fragile, sensitive, rare, irreplaceable, exemplary, and unique." There is no documentation in Chapter 3, 4 or Appendix G, of any relevant documents that verify these qualities. Appendix G also states that the significance of these important resources has been recognized (no citation is given). The draft RMP does not contain adequate data to support the designation of the proposed ACEC. Without any supporting documentation of the draft RMP of the "importance" of this area, the Nine Mile Canyon Expansion ACEC should be eliminated from consideration as an ACEC	Resource Area RMP of 1993. The Nine Mile Canyon Expansion was not designated. Chapter 4 has been revised to include protective measures that protect relevant and important resources.
ACEC NOA	IPAMS	B-3	6	The USFWS requires that black footed ferret surveys be conducted prior to commencing construction and drilling operations in prairie dog colonies, provided that a minimum of 200 acres of white-tailed prairie dog colonies with a minimum density of 8 burrows/acre are present (U.S. Fish and Wildlife Service 1989). It is not indicated in the draft RMP whether these purportedly critical areas meet the USFWS criteria, information that must be included in the RMP. The USFWS, BLM, and Utah DWR are closely monitoring the released black-footed ferret populations. Therefore, the white-tailed prairie dog and black-footed ferrets are more than sufficiently protected, and the overlapping restrictions that would result from designating an ACEC in the Coyote Basin are completely	The Proposed RMP does not designate the Coyote Basin or Coyote Basin Complex as an ACEC. Chapter 4 has been revised to include protective measures that protect relevant and important resources. The Proposed RMP continues the designation of the existing Nine Mile Canyon ACEC that was carried forward from the Diamond Mountain Resource Area RMP of 1993. The Nine Mile Canyon Expansion was not designated. Chapter 4 has been revised to include protective measures that protect relevant and important resources.

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ACEC NOA	IPAMS	B-3	5	<p>Coyote Basin- Under Alternatives A and B the Coyote Basin ACEC would include 87,743 acres and 47,659 acres, respectively. The draft RMP claims this ACEC would protect a high value "critical" ecosystem for the white-tailed prairie dog and numerous special status wildlife species. No documentation is provided to verify that this area contains "critical" white-tailed prairie dog habitat and no mention is made that the US Fish and Wildlife Service decided against listing the white-tailed prairie dog as a threatened or endangered species because it was found to be in abundance and in no threat of extinction. In addition, page 3-80 states that this proposed ACEC provides "crucial habitat for the pronghorn, as well as for several special status species including the ferruginous hawk, peregrine falcon, sage grouse, long-billed curlew, grasshopper sparrow short-eared owl, big free-tailed bat, black-footed ferret, and ringtail cat." Many of these species occur throughout the West, which does not support the conclusion that the proposed ACEC provides "crucial habitat" for these species. In addition, no supporting data are provided to even support the assertion of the area provides crucial</p>	<p>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, five alternatives including Alternative E in the Supplement and the No Action Alternative (D) were identified further analysis. The management prescriptions and actions outlined in these alternatives consider 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.</p> <p>The PRMP/FEIS has been revised to more easily identify the Proposed RMP and the different management prescriptions of each alternative.</p>

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Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				habitat for these species.	
WSA Supplement	Duchesne County Commission	G-10	30	Page 4-104, Section 4.16.2.10.1: Alternative B seems to be left out of the analysis for the Coyote Basin and Four Mile Wash ACEC's.	The commenter is correct that the Alternative B analysis has been left out of the analysis. This will be updated in the Final EIS. Four Mile wash would not be designated under alternative B, and as a result would not impact, or would have the same impact as alternative D.

**Table 5.13c. Comments Requiring a Change in the Document: Alternatives Development**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	AT100 (R-AT10)	Modify the following statement as indicated by bolded additions and strikethrough deletions:  "Soil types and climatic variations would be major determinates to reclamation that would range from ten years or longer to permanent scarring of the landscape."  There is no record of oil and gas development "permanently scarring" the landscape.	Section 4.14.3 in the PRMP/FEIS has been completely rewritten. The paragraph cited in the comment has been deleted. The suggested wording change is not longer applicable.

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	AQ1	Table 3.2.5 Sensitive Areas to Be Considered in the Analysis: Brown's Park NWR and Ouray NWR are managed by the USFWS not the NPS.	Table 3.2.5 of the 2004 Air Report has been revised to clarify that the Brown's Park NWR and the Ouray NWR are managed by the USFSW and not the NPS.
Draft RMP/EIS	USFS—Ashley National Forest	G-19	AQ103	Please add existing deposition and lake ANC conditions relating to the High Uintas Wilderness to the Affected Environment discussion for the area, including the larger area considered in the cumulative effects analysis. The High Uintas Wilderness is in the same State defined airshed as most of the oil and gas development ( <a href="http://www.utahsmp.net/GRAPHICS/UTAIRS1.jpg">www.utahsmp.net/GRAPHICS/UTAIRS1.jpg</a> ).	Section 3.2.3 in the Final EIS has been revised to make some of the change(s) as suggested. The 4th paragraph of this section now reads as follows:  "In addition to these requirements, the National Park Service (NPS) Organic Act requires the NPS to protect the natural resources of the lands it manages from the adverse effects of air pollution. In 1978, the US Forest Service (USFS) Air Monitoring Program was established to protect all USFS managed lands from the adverse effects of air pollution. In 1988, the USFS became a primary participant in the national visibility monitoring program titled Interagency Monitoring of Protected Visual Environments (IMPROVE). Starting with the enactment of the Regional Haze Rule, the USFS has provided regional haze monitoring representing all visibility-protected federal Class I areas where practical."
Draft RMP/EIS	USFS—Ashley National Forest	G-19	AQ140	There seem to be discrepancies between this table (which does not identify air quality concerns) and information in the Air Quality Assessment Report (Trinity, 8/04). For example:  At least 1 day >5% would occur in the High Uintas Wilderness and Flaming Gorge NRA	Table 4.2.7 in the PRMP/FEIS has been revised so that it is consistent with the TSD.  See comment response AQ134.

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				(p. 113, Trinity report) under all alternatives. The narrative (p. 110, Cumulative) states that, "Visibility for BLM sources only showed no impacts >1.0 deciview for any sensitive area. Some sensitive areas exceeded the 1.0 deciview threshold for inventory sources only and inventory plus BLM sources."	
Draft RMP/EIS	Utah DEQ – Division of Air Quality	G-31	AQ68	The DRMP-EIS incorrectly lists the UDAQ emission inventory data as the source information for the NAAQS table. Emission inventory data are not monitoring data.	Table 3.2.1 in the PRMP/FEIS has been replaced so that it now depicts Applicable Ambient Air Quality Standards instead of Ambient Air Quality Data.
Draft RMP/EIS	Utah DEQ – Division of Air Quality	G-31	AQ72	<p>The following statement is incorrect:</p> <p>"The NAAQS represent maximum acceptable concentrations that generally may not be exceeded except annual standards, which may never be exceeded."</p> <p>Please refer to the applicable standard to determine the form of the standard, and to show if a violation has occurred. For example some standards are based upon three-year averages, and some standards are based on the 4th highest maximum concentration.</p>	<p>Section 3.2.3 in the PRMP/FEIS has been revised to read as follows:</p> <p>"Air quality in a given location is defined by pollutant concentrations in the atmosphere and is generally expressed in units of parts per million (ppm) or micrograms per cubic meter (<math>\mu\text{g}/\text{m}^3</math>). One measure of a pollutant is its concentration in comparison to a national and/or state ambient air quality standard. The National Ambient Air Quality Standards (NAAQS) and Utah Air Quality Standards are health-based criteria for the maximum acceptable concentrations of air pollutants (with a margin of safety) at all locations to which the public has access. The NAAQS are established by the EPA and are outlined in the Code of Federal Regulations (40 CFR 50). An area that does not meet the NAAQS is designated as a nonattainment area on a pollutant-by-pollutant basis. The State of Utah has adopted the</p>

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					NAAQS as state air quality standards. In 2004, the EPA passed a suite of actions called the Clean Air Rules of 2004 aimed at improving America's air quality. Two of the rules, the Nonroad Diesel Rule and the Ozone Rules, will potentially improve the future air quality of the VPA."
Draft RMP/EIS	Utah DEQ – Division of Air Quality	G-31	AQ73	Table 3.2.2 is incorrect. The table implies that only a handful of emission sources are located in Daggett, Duchesne, and Grand and Uintah counties. Is this table referring to a certain size of emission sources? Please specify the criteria that were used to develop the table.	Table 3.2.2 (Emission Sources in the VPA) of the Draft RMP has been deleted from the PRMP/FEIS. The text that cited Table 3.2.2 (Section 3.2.4) has been revised to read as follows:  "The VPA covers Daggett, Duchesne, and Uintah Counties and part of Grand County. Currently, emission sources within the VPA consist of mostly oil and gas development facilities and mining sites. There are also fugitive dust sources associated with these sites, construction activities and roadways. A detailed listing of emission sources in and around the VPA, along with information on how specific sources were addressed in the air quality modeling, is available the TSD (Trinity and Nicholls, 2006, tabular source information is found in Appendix C)."
Draft RMP/EIS	US EPA Region VIII	G-32	AQ86	Visibility. Section 4.2.2.6.7.4 explains that the screening analysis for visibility showed reduction in visibility at Class I areas due to BLM sources alone. The Technical Support Document is consistent with this statement. Table 4.2.7	Table 4.2.7 and the accompanying text in the PRMP/FEIS EIS have been revised to clarify the presentation of the results of the screening and refined visibility analysis.

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				<p>shows cumulative visibility impacts and combines results of the screening analysis with results of a refined analysis. BLM conducted a refined analysis in cases where the screening analysis showed impacts. An error in the text accompanying Table 4.2.7 refers to "the screening visibility analysis" and could lead the reader to believe that a screening analysis resulted in no perceptible visibility impacts. Table 5-65 of the Technical Support Document reveals the results of the screening analysis of cumulative visibility impacts. The analysis showed potential days of visibility reductions greater than 1.0 deciview (dv) at the Arches National Park Class I area (one day) and at the Class II Dinosaur National Monument (three days). (Additional days of reduced visibility were modeled for sources in the Glenwood Springs planning area. One of the three days of cumulative impact greater than 1.0 dv at Dinosaur National Monument resulted only when emissions from BLM sources were added to those of the inventory sources. In other words, the potential impact of the BLM sources tipped the balance and caused potential cumulative impacts to exceed 1.0 dv. Please revise the text accompanying table 4.2.7 to show that the screening analysis showed potential visibility impacts that disappeared in the refined analysis.</p>	
Draft RMP/EIS	US EPA Region VIII	G-32	AQ89	Section 3.2.2, Baseline Air Quality page 3-4: According to the first sentence of section 3.2.2	Section 3.2.2 in the PRMP/FEIS has been revised to make the change(s) as suggested.

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				of the DEIS, the Vernal Planning Area is "designated as being in attainment" for the National Ambient Air Quality Standards. (Section 4.2 begins with a similar sentence. The area technically is "unclassifiable" in the case of PM10 and "unclassifiable/attainment" for other pollutants (see 40 CFR Part 81). Please revise this portion of the DEIS. Also, please revise "air-born" to "airborne."	This section now reads as follows:  "The VPA is located in a region designated as unclassifiable for PM10 and unclassifiable/attainment for all other airborne pollutants [See 40 CFR Part 81] (L. Svoboda, EPA Region VIII, 2005)."
Draft RMP/EIS	US EPA Region VIII	G-32	AQ91	Section 3.2.4, Regional Air Emissions, page 3-5: This section of the DEIS generally describes the emissions inventory for the planning area. It covers point sources but does not mention such emissions as dust from construction activities and roadways, which were included in the modeling effort according to the Air Quality Assessment Report. Please revise this section to address fugitive dust emissions.	Section 3.2.4 in the PRMP/FEIS has been revised. See comment response AQ73 to view the revised text.
Draft RMP/EIS	US EPA Region VIII	G-32	AQ92	Section 3.2.4.2, National Ambient Air Quality Standards, page 3-4: Please revise the reference to NAAQS as "absolute" upper limits. Alternative wording could be:  "The National Ambient Air Quality Standards (NAAQS) and Utah Air Quality Standards are health-based criteria for the maximum acceptable concentrations of air pollutants at all locations to which the public has access."	Section 3.2.4.2 in the PRMP/FEIS has been revised to make the change as suggested.
Draft RMP/EIS	US EPA Region VIII	G-32	AQ93	Section 4.2.2.4.1.1, Direct Effects of Prescribed Fire and Criteria Pollutants, page 4-10: Please correct the typographical error in	Section 4.2.2.5.1.1 in the PRMP/FEIS has been revised to make the change(s) as suggested.

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				identifying carbon dioxide (CO <sub>2</sub> ) as a criteria pollutant and include carbon monoxide (CO) as a criteria pollutant that wildland fires and prescribed fires emit.	
Draft RMP/EIS	US EPA Region VIII	G-32	AQ94	Air Quality – Technical Support Document (Air Quality Assessment Report). 1) National Park Service Reference. Please correct the date in the footnote to Table 3-24.	The footnote to Table 3-24 in the TSD has been revised to make the change(s) as suggested.
Draft RMP/EIS	US EPA Region VIII	G-32	AQ95	Air Quality – Technical Support Document (Air Quality Assessment Report). 2) Increment Comparison Results. The value for three-hour SO <sub>2</sub> under "GMA BLM Sources Only" (Glenwood Springs Management Area) in Table 5-12 differs by an order of magnitude from the corresponding values in tables 5-13 through 5-16 and might be a typographical error. Please check this value and revise if necessary.	The TSD has been revised to make the change(s) as suggested.
Draft RMP/EIS	Vicki Stamper	I-99	AQ17	The Near-Field Analysis Used Different Compressor Stack Parameters than Used in the Far-Field Analysis, Which Likely Meant the NO <sub>2</sub> Concentrations Were Underestimated in the Near-Field Analysis Table 3-19 (page 34 of the 2004 Air Report) shows the stack parameters used for compressors in the near-field analysis, and the parameters vary greatly from the compressor stack parameters used in the far-field analysis (see Table 3-10, page 23 of 2004 Air Report) or the parameters identified as typical for compressor engines in Table 3-4 of the 2004 Air Report (page 18 of 2004 Air	Table 3-19 of the 2004 Air Report has been revised to correct the errors. However, the modeling was done with the correct source parameters and does not need to be redone.

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				Report). Specifically, the near-field analysis assumed a compressor stack height of 1.83 meters (m), an exit velocity of 1.83 meters per second (m/s), ambient temperature of the plume (294.3 K), and a stack diameter of 0.13 m. The far-field analysis used stack parameters for compressors of 6.1 m stack height, 0.9 m stack diameter, 30 m/s exit velocity, and 755 K exit temperature, which appear to be much more appropriate for compressor engines. These differences could have resulted in lower modeled concentrations, and thus the modeling must be redone with the correct compressor engine stack parameters.	
Draft RMP/EIS	Vicki Stamper	I-99	AQ23	While the BLM placed receptors within close proximity to the road when only modeling impacts from the road, there were no receptors within the modeled well field area for the modeling assessment of all particulate matter impacts (i.e., due to roads, well construction, and operation). Because most of the particulate emissions are fugitive emissions, the highest impacts will occur within close proximity to the sources. Thus, to provide a complete picture of the ambient air particulate matter impacts that could occur as a result of all particulate sources, receptors should have been included within the grouping of wells, as well as outside of the grouping of wells.	A separate analysis of the impacts from the road only was done at the request of EPA Region 8. To address the comment regarding the placement of receptors, and to update the near-field analysis to reflect site-specificity, the near-field analysis was updated. The changes made in the analysis are outlined at the end of this document. Please note that the essentials of the analysis (5 x 5 well matrix, etc.) have not changed.
Draft	Vicki	I-99	AQ27	The estimate of the Number of Compressors	The commenter has misinterpreted Table A-4.

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
RMP/EIS	Stamper		<p>Engines Used in the CALPUFF Modeling Seems to be in Error. The CALPUFF analysis, done primarily for the far-field modeling assessment, assumed that at most only 69 compressor engines would be necessary for the full development allowed under the Vernal DRMP along with other reasonably foreseeable gas development in the area. (Table 3-8, page 22 of the 2004 Air Report, as well as Table D- 10 of Appendix D of the Air Report). There are several flaws in this analysis.</p> <p>This total number of needed compressors conflicts with Table A-4 of the Vernal DRMP/EIS (page 4-5), which includes projected numbers of compressors from oil and gas development on all lands within the Vernal Field Office Area. Specifically, Table A-4 indicates a total of 167 compressor stations will be needed due to future mineral production activity in the Vernal Field Office area. It is not clear what size of compressor stations was assumed for the date in Table A-4 -clearly if it was smaller than 1,000 horsepower (as assumed in the Air Report), then more compressor engines would be needed. However, if smaller compressor engines were projected, then this calls into question the assumed 1,000 hp size of all compressors for the Air Report and analyses. Assuming larger compressor engines would mean the compressor engines would be more</p>	<p>The units for the line "Compressor Stations" are acres, not number of stations (See Column headings of table).</p> <p>The 2004 Air Report has been revised to change the table number so that it is consistent with the other tables in Chapter 4.</p>

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				dispersed, thus likely resulting in lower near-field impacts. But, if more numerous, smaller compressor engines are expected, this should be modeled to reflect maximum potential near field impacts. In any case, the number of compressor engines modeled for the Vernal air analysis needs to be reconciled with the projection of more than double the amount of compressor stations in Table A-4 of the DRMP/EIS.	
Draft RMP/EIS	Vicki Stamper	I-99	AQ36	<p>The DRMP/EIS Failed to Include a Proper Cumulative PSD Increment Analysis.</p> <p>The DRMP/EIS did not include a proper cumulative evaluation of prevention of significant deterioration (PSD) increment consumption. While the DRMP/EIS did include certain sources that have either begun operation or had been modified since the "monitoring baseline date," the analysis did not include ml sources which consume the available PSD increment. In general, those sources which commenced construction or which have increased emissions after the applicable PSD "minor source baseline date" consume the available increment. Major sources which commenced construction after the major source baseline date also consume the available increment. [See definition of "baseline concentration" in 40 C.F.R. 52.21(b)(13).] To determine the inventory necessary to assess whether Vernal sources will cause or contribute to PSD increment</p>	<p>Section 4.2.2.6.4 in the PRMP/FEIS has been revised to replace the phrase "monitoring baseline date" with "monitoring base year" in order to avoid confusion with the term "baseline" as used in conjunction with PSD. The 2nd sentence of this section now reads as follows:</p> <p>"The first group referred to as "inventory sources", included new and modified emission sources that have commenced operation since the monitoring base year date."</p> <p>The analysis of increment consumption is the sole responsibility of State air agencies that have been delegated authority by EPA under the Clean Air Act.</p>

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				violations, the PSD minor source baseline dates for the area should have first been determined. The PSD baseline dates define the sources that need to be modeled, and thus using background monitoring concentrations does not provide a realistic analysis of increment consumption.	
Draft RMP/EIS	Vicki Stamper	I-99	AQ43	On pages 19-20 of the 2004 Air Report, adjustments made to the inventory sources are discussed. Apparently, the BLM removed several sources from the inventory based on the distance of those sources to the receptor of maximum modeled concentration for five Class I areas (Arches and Canyonlands National Parks and the Maroon Bells, Mt. Zirkel, and West Elk Wilderness Areas). It is not clear what pollutant concentration was used for this "analysis," although the 2004 Air Report does indicate that particulate emissions were examined. As a result of this "screening" analysis by the BLM, large and/or nearby sources of air pollution were removed from the source inventory. These include, among others, the Hunter and Huntington coal-fired power plants, Sunnyside Cogen, the Ouray compressor stations (located within the Vernal Field Office ), and the Moab compressor stations. In addition, no sources in western Colorado that could be impacting the Vernal Field Office area should have been removed from the inventory for the analysis of impacts in the Vernal Field Office area which runs to the border of Colorado. The removal of	<p>The 2004 Air Report has been revised to clarify how the analysis was performed.</p> <p>The commenter misunderstands how the adjustments to inventory sources were done. The analysis of source-receptor relationships was done only to select a limited number of inventory sources for further review. This was based on particulate matter results of previous modeling of inventory sources and the five Class I areas that had the highest particulate matter impacts.</p> <p>Those sources selected through this screening process were given further scrutiny to check the information provided to Trinity Consultants. No sources were eliminated based solely on the results of the source-receptor relationship analysis.</p>

**Table 5.13d. Comments Requiring a Change in the Document: Air Quality**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			<p>western Colorado sources without any consideration of impacts on the Vernal Field Office area is nonsensical and very likely resulted in an underestimate of ambient impacts in the Vernal Field Office area.</p> <p>This approach to determine whether a source can be excluded from a cumulative analysis based on its distance from a particular Class I area is not consistent with other commonly used methods for determining whether a cumulative air quality analysis is necessary, nor does it seem scientifically defensible - especially to examine the impacts due to only one pollutant or only at certain Class I areas. Further, considering the large area and number of sources being modeled, it does not seem appropriate to discount the impact of anyone source based on apparent insignificance when, cumulatively, such sources can have a significant impact on an area. In addition, the 2004 Air Report admits that the inventory of sources likely left out some significant sources, in stating "Based on the results of the focused BLM analysis...it is almost certain that some sources included in the modeling should have been screened out, and that some sources not included in the modeling likely should have been." [Emphasis added.] (page 19 of Air Report). As stated in the definition of "Significantly" in the NEP A regulations at 40 C.F.R. § 1508.27, "significance exists if it is reasonable to</p>	

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by. ..breaking [an action] down into small component parts." The EIS is required to include an analysis of significant environmental consequences, pursuant to 40 C.F.R. §§ 1502.1 and 1502.16, and thus the RMP/EIS must include an adequate analysis of the cumulative impacts on air quality.	
WSA Supplement	US EPA	G-6	14	<p>Visibility. Section 4.2.2.6.7.4 explains that the screening analysis for visibility showed no reduction in visibility at Class I areas due to BLM sources alone. The Technical Support Document is consistent with this statement. Table 4.2.7 shows cumulative visibility impacts and combines results of the screening analysis with results of a refined analysis. BLM conducted a refined analysis in cases where the screening analysis showed impacts. An error in the text accompanying table 4.2.7 refers to "the screening visibility analysis" and could lead the reader to believe that a screening analysis resulted in no perceptible visibility impacts. Table 5-65 of the Technical Support Document reveals the results of the screening analysis of cumulative visibility impacts. The analysis showed potential days of visibility reductions greater than 1.0 deceive (dv) at the Arches National Park Class I area (one day) and at the Class II area of Dinosaur National Monument</p>	<p>Table 4.2.7 and the text accompanying will be changed to reflect the appropriate analysis.</p> <p>Visibility modeling for Class II areas is done as a courtesy to the responsible FLM. Class II areas have no visibility protect under State or Federal Law.</p>

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				(three days). (Additional days of reduced visibility were modeled for sources in the Glenwood Springs planning area.) One of the three days of cumulative visibility impact greater than 1.0 dv at Dinosaur National Monument resulted only when emissions from BLM sources were added to those of the inventory sources. In other words, the potential impact of the BLM sources tipped the balance and caused potential cumulative impacts to exceed 1.0 dv. Please revise the text accompanying table 4.2.7 to show that the screening analysis showed potential visibility impacts that disappeared in the refined analysis.	
WSA Supplement	US EPA	G-6	37	Section 3.2.2, Baseline Air Quality page 3-4: According to the first sentence of section 3.2.2 of the DEIS, the Vernal Planning Area is "designated as being in attainment" for the National Ambient Air Quality Standards. (Section 4.2 begins with a similar sentence.) The area technically is "unclassifiable" in the case of PM10 and "unclassifiable/attainment" for other pollutants (see 40 CFR Part 81). Please revise this portion of the DEIS. Also, please revise "air-born" to "airborne.")	This change has been made in the proposed RMP and final EIS.
WSA Supplement	US EPA	G-6	38	Section 3.2.4.2, Criteria for Background Concentrations, pages 3-4 through 3-8 The DEIS presents different data on existing air quality (Table 3.2.1) and background concentrations for modeling purposes (Table 3.2.6). The two tables present data on the same	The tables have changed to present a single set of background data in the proposed RMP and final EIS ( see table 3.2.6.

Table 5.13d. Comments Requiring a Change in the Document: Air Quality

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				<p>pollutants from different air monitoring stations. In the case of PM<sub>10</sub>, Table 3.2.1 gives an annual concentration of 3.3 ug/m<sup>3</sup>, while Table 3.2.6 gives an annual concentration of 10 ug/m<sup>3</sup>. Table 3.2.1 gives an annual NO<sub>2</sub> concentration of 41 ug/m<sup>3</sup> (0.022 ppm) and Table 3.2.6 gives an annual NO<sub>2</sub> concentration of 10 ug/m<sup>3</sup> (0.005 ppm). Please revise the Final EIS to clarify the reasons for using different sources of data.</p>	
WSA Supplement	US EPA	G-6	39	<p>Section 3.2.4. Regional Air Emissions. Page 3.5 This section of the DEIS generally, describes the emissions inventory for the planning area. It covers point sources but does not mention such emissions as dust from construction activities and roadways, which were included in the modeling effort according to the Air Quality Assessment Report.</p> <p>Please revise this section to address fugitive dust emissions</p>	Fugitive dust emissions have been added to section 3.2.4.

Table 5.13e. Comments Requiring a Change in the Document: Cultural Resources

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	CR21	Proposed cultural resources protections listed on page 2-43 indicate that oil and gas leasing would be "subject to timing and controlled surface use stipulations or no surface occupancy to protect cultural sites" for various areas within the VFO. No stipulations related to this are discussed in Appendix K. Please, clarify this proposal. How do timing restrictions protect cultural sites? How do these "stipulations" fit in with the Section 106 protection process, which involves the SHPO and discussions at the time of a proposal about mitigation methodologies? We are concerned that the BLM is prejudging cultural resource mitigation strategies through the use of unnecessarily restrictive stipulations.	<p>Appendix K in the PRMP/FEIS has been revised regarding stipulations for cultural resources.</p> <p>Timing restrictions can aid in the protection of cultural resources from indirect effects caused by such things as increased on-site erosion from altered run-off patterns resulted from rutted roads created during wet weather conditions and increased site sedimentation from fugitive dust accumulation in dry conditions; however, these protections are expected to be limited. The primary focus for protection of cultural resources is not on seasonal restrictions but on surface disturbance restrictions under the controlled surface use and no surface occupancy stipulations.</p> <p>Under all alternatives, the stipulations for CSO and NSO would be applied to leases in which there are specific cultural resources that have been found through the Section 106 process to be eligible for the National Register of Historic Places, and for which the mitigation, as necessary, has been identified as avoidance through the Section 106 consensus process. Protective measures for cultural resources are part of standard lease terms applicable to all surface-disturbing activities.</p>
Draft	IPAMS	O-14	CR30	The DEIS states that no alternative benefits	Section 4.3.2.13 in the PRMP/FEIS has added

Table 5.13e. Comments Requiring a Change in the Document: Cultural Resources

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS				cultural resources. While the underlying assumption of this statement is that cultural resources are better off left alone, the section should also acknowledge that proper identification of cultural resource sites, data collection at those sites, and recording of sites that cannot be avoided, are all activities that would contribute to the body of scientific knowledge and understanding of the cultures that once occupied the vernal planning area.	the following additional language:  "It should be noted, however, that both the identification of sites and the mitigation of impacts through data recovery conducted in association with the Section 106 process for land uses have the positive impact of increasing the body of knowledge about past human behaviors and occupations in the Vernal Planning Area."
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	CR30	The DEIS states that no alternative benefits cultural resources. While the underlying assumption of this statement is that cultural resources are better off left alone, the section should also acknowledge that proper identification of cultural resource sites, data collection at those sites, and recording of sites that cannot be avoided, are all activities that would contribute to the body of scientific knowledge and understanding of the cultures that once occupied the vernal planning area.	Section 4.3.2.13 in the PRMP/FEIS has added the following additional language:  "It should be noted, however, that both the identification of sites and the mitigation of impacts through data recovery conducted in association with the Section 106 process for land uses have the positive impact of increasing the body of knowledge about past human behaviors and occupations in the Vernal Planning Area."
Draft RMP/EIS	Utah Petroleum Association	O-42	CR30	The DEIS states that no alternative benefits cultural resources. While the underlying assumption of this statement is that cultural resources are better off left alone, the section should also acknowledge that proper identification of cultural resource sites, data collection at those sites, and recording of sites that cannot be avoided, are all activities that would contribute to the body of scientific knowledge and understanding of the cultures	Section 4.3.2.13 in the PRMP/FEIS has added the following additional language:  "It should be noted, however, that both the identification of sites and the mitigation of impacts through data recovery conducted in association with the Section 106 process for land uses have the positive impact of increasing the body of knowledge about past human behaviors and occupations in the Vernal

Table 5.13e. Comments Requiring a Change in the Document: Cultural Resources

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				that once occupied the vernal planning area.	Planning Area."
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	CR52 (R-CR11)	<p>4.3.2.11 Impacts of Wildlife and Fisheries Decisions of Cultural Resources</p> <p>The RMP incorrectly assumes that land use per se harms cultural resources. As written, the RMP treats wildlife and wild horse grazing as having no impact but livestock grazing as having an adverse impact. This is inaccurate and biased.</p>	<p>Section 4.3.2.5 in the PRMP/FEIS describes the impacts of trampling impacts from livestock. Section 4.3.2.11 describes the trampling impacts from wildlife and wild horses. The text in Section 4.3.2.11 has been revised as follows:</p> <p>"It should be noted, however, that direct, long-term adverse impacts to cultural resources might occur from wildlife use of the Planning Area. These impacts are primarily related to the trampling of archaeological sites by herd animals such as wild horses, burros, and elk. These potential impacts would typically be comparable to those described for livestock grazing. Because of their particular herd behavior, wild horses may have a slightly greater impact on cultural resources by trampling, as evidenced by the higher level of vegetation damage and soil erosion noted in areas where wild horses congregate."</p>

Table 5.13f. Comments Requiring a Change in the Document: Fire Management

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft	Duchesne	G-9	FM2	This summary fails to address the relative merits of the four alternatives based on	Section 4.4.2.8 in the PRMP/FEIS has been revised to summarize the effects of woodland

Table 5.13f. Comments Requiring a Change in the Document: Fire Management

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS	County			woodland and forest decisions.	and forest management decisions on fire management to each alternative summary.
Draft RMP/EIS	UBAOG	G-22	FM2	This summary fails to address the relative merits of the four alternatives based on woodland and forest decisions.	Section 4.4.2.8 in the PRMP/FEIS has been revised to summarize the effects of woodland and forest management decisions on fire management to each alternative summary.
Draft RMP/EIS	Center for Native Ecosystems	O-38	FM12 (JFM-3)	Because of the extent of cheatgrass infestation in the Vernal FO, prescribed fire must be used with caution. Page 3-22 indicates "unplanned fire is not desired at all... in the desert shrub type where the risk of cheatgrass...is high after an area has been burned or treated". ...However this is one of the few places in the document that acknowledges that fire must be used with caution in light of the cheatgrass. On page 2-99, fire is considered to be a benefit to special status species. Page 4-232 makes a reference to cheatgrass but does not fully analyze how fire in areas with cheatgrass could affect special status species. This should be addressed in the final draft.	Section 4.15.1.1 in the PRMP/FEIS has been revised to clarify the impact of fire in areas with cheatgrass and how fire could affect special status species. The following language has been inserted:  "If prescribed fires were to spread beyond their intended dense woodland target these fires would have adverse impacts on special status species by directly destroying individual plants of special status plant species or by indirectly contributing to the risk of cheatgrass invasion, which is higher following a fire."
WSA Supplement	US EPA	G-6	48	Section 4.2.2.5.1.1, Direct Effects of Prescribed Fire and Criteria Pollutants, Page 4-10: Please correct the typographical error in identifying carbon dioxide (CO2) as a criteria pollutant and include carbon monoxide (CO) as a criteria pollutant that wildland fires and prescribed fires emit.	The language in the cited section will be amended to list the correct criteria pollutant as carbon monoxide.

Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	LG68	Statements about the impacts of various levels of grazing in the "Nine Mile Acquired Area" (page 2-105) in relation to scenic values appear to have no basis in fact, and are too general. The impacts are tied to grazing levels described as "elimination," "limited," and "unlimited," and postulate effects of "preserve," "partially preserve," and "diminish" scenic quality. What are these statements based on? Are the effects of grazing being tied to VRM classifications, and if so, where is the supporting analysis? Are the effects of grazing being tied to the BLM's riparian policy, and if so, where is the consideration of the mitigation measures? The State of Utah requests that the BLM improve on this analysis, and discuss real on-the-ground issues in light of the BLM's riparian policy, no on unsupported assumptions.	Table 2.1.8 (Livestock and Grazing Management) in the PRMP/FEIS for the Proposed RMP column has been revised to read as follows:  "Livestock grazing could be allowed in the Nine-Mile Acquired Area if such use is controlled, of short duration, and would not detract from recreation and/or riparian values along the river and is in accordance with the Green River Allotment Management Plan administered by the Price Field Office"
Draft RMP/EIS	Duchesne County	G-9	LG107 (LG-S) (LG-22)	Section 4.6.2.4 does not seem to exist in the document and the effects of livestock grazing decisions on fire management definitely needs to be addressed	Section 4.7.2.1.1 in the PRMP/FEIS has been revised to remove the reference Section 4.6.2.4 and to impacts analysis of livestock grazing management actions on fire management. As stated in Section 4.4.2, the management actions associated with livestock grazing would have negligible impacts on fire management.
Draft RMP/EIS	UBAOG	G-22	LG16	"Maintain or improve the total forage resource using techniques that are compatible with the use and development of other resources and which would meet or	Table 2.1.6 (Forage – All Localities) in the PRMP/FEIS (under the subsection entitled Goals and Objectives, has been changed to read as follows:

**Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				<p>exceed Utah BLM Rangeland Health Standards."</p> <p>Add after "would":</p> <p>"make substantial progress and"</p> <p>The grazing rules recognize that making progress towards meeting rangeland health standards is compliance. 43 I.E. §4180.1. The RMP generally omits this key qualifier, which is problematic because in many cases it will take many years to "achieve" range health standards.</p>	<p>"Maintain or improve the total forage resource using techniques that are compatible with the use and development of other resources and which would meet, make substantial progress toward, or exceed Utah BLM Rangeland Health Standards."</p>
Draft RMP/EIS	UBAOG	G-22	LG28	<p>The Counties object to these limits on changes in livestock for several reasons. First, the grazing rules govern such changes and require monitoring data and other relevant information. 43 C.F.R. § 4130.3-2. Second, the limits on crucial deer range or wild horse areas are not within the scope of the rules. Similarly the limits on conversions and range improvements in WSAs are not required in the IMP. Strike or rewrite these provisions.</p>	<p>The allocation of resources and the uses made of BLM lands is a function of the Land-use Planning process. Proposed livestock conversions will be analyzed on a site specific basis considering the criteria as outlined in the plan. This is an appropriate use of the LUP as it allocates uses of the land and guides the management of the BLM lands. Monitoring data and other relevant information will be used to analyze the impacts of livestock conversions and make the decision as to whether or not to approve the proposed conversion.</p> <p>The subsection entitled Criteria for Changing Class of Livestock, in the PRMP/FEIS for Table 2.1.8 (Livestock and Grazing Management), has been revised to read:</p>

Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					"Prior to the authorization of any livestock conversions in WSAs, the impacts from any necessary rangeland improvements projects would be assessed."
Draft RMP/EIS	UBAOG	G-22	LG30	Strike this bullet. Replace with  "conversions in WSAs would be made when in compliance with H-8550-1 IMP Chapter 3 Guidelines for Specific Activities -D. The Interim Management Plan (IMP) is to direct activities within the WSAs until such time as congress acts on the designations."  It is very specific in the analysis and provisions for such conversions and should not be replaced with language that is inconsistent with the IMP and that is vague.	The subsection entitled Criteria for Changing Class of Livestock, in the PRMP/FEIS for Table 2.1.8 (Livestock and Grazing Management), has been revised to incorporate the suggested change.
Draft RMP/EIS	UBAOG	G-22	LG31	Strike this paragraph as it is not consistent with the WSA IMP.  If not struck it should be provided that such designations should not be more restrictive than requirements of the IMP.	The subsection entitled Criteria for Changing Class of Livestock, in the PRMP/FEIS for Table 2.1.8 (Livestock and Grazing Management), has deleted the bullet item in question to make it consistent with the WSA IMP.
Draft RMP/EIS	Bill Robinson	I-173	LG86	It should be noted that section 3.7 contains serious errors. In the first part of this section it states that "comprehensive grazing allotment information is summarized in Appendix N." Appendix N does not exist. The reader has no way of knowing which allotments make part of what areas.	Appendix L in the PRMP/FEIS has been revised to correct grazing allotment information.

**Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Bill Robinson	I-173	LG119 (LG-EE)	The BLM in its DRMP/DEIS fails to acknowledge the significant benefits that properly managed sheep grazing can have on the condition of the range and environment. There is a sizeable amount scientific research that shows that sheep grazing can improve wildlife habitat (see Comment letter I-173for references). These studies need to be properly addressed before the BLM continues in its unjustified position regarding sheep grazing and then require a change from sheep to cattle grazing.	<p>The following references have been added to the PRMP/FEIS:</p> <p>Jeffery C. Mosely, Prescribed Sheep Grazing to Enhance Wildlife Habitat on North American Rangelands. "Sheep Research Journal", 1994, pp. 79-91;</p> <p>K.M. Havstad, Sheep Grazing as a Rangeland Improvement Tool, " Sheep Research Journal," 1994, pp. 72-78;</p> <p>B.E. Olson and J.R. Lacey, Sheep: A Method for Controlling Rangeland Weeds, "Sheep Research Journal," 1994, pp. 105-112.</p> <p>See comment response LG118.</p>
Draft RMP/EIS	Bill Robinson	I-173	LG123 (LG-II)	The DRMP fails to identify what allotments are located within what area. Thus, a permittee has no way of knowing with any certainty what the DRMP is proposing will be the season of use for their permits. A permittee has no actual notice of exactly how their permit and the season of use will be affected. This eliminates the effectiveness of a comment period for the permittees to make substantive comments. The BLM should remedy this error and seek to address a season of use for each allotment instead of the macro-level treatment that is currently within the	The addition of allotment boundaries and names in Figures 7 – 10 would have made the figures unreadable so a seasons of use code has been added to the Appendix L (Grazing Allotment Table). This will indicate which allotments fall within which seasons of use area.

**Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				DRMP/DEIS. This would best serve the environment and allow for the best and proper management of the range of resources within the VPA.	
Draft RMP/EIS	Duchesne County Water Conservancy District	O-10	LG107 (LG-S) (LG-22)	Section 4.6.2.4 does not seem to exist in the document and the effects of livestock grazing decisions on fire management definitely needs to be addressed	Section 4.7.2.1.1 in the PRMP/FEIS has been revised to remove the reference Section 4.6.2.4 and to impacts analysis of livestock grazing management actions on fire management. As stated in Section 4.4.2, the management actions associated with livestock grazing would have negligible impacts on fire management.
Draft RMP/EIS	Duchesne County Water Conservancy District	O-10	LG108 (LG-T)	DCWCD would question the assumption that management decisions for livestock and grazing, forage and wild horse resources would always result in a loss of vegetative cover and result in wind and water erosion. With proper management, livestock grazing can actually have beneficial effects.	Section 4.13.1.3 in the PRMP/FEIS has been revised to eliminate the use of the word "always" and to reflect the concept that vegetation loss is possible but not a given.
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	LG82 (R-AT8)	Modify the following statement as indicated by bolded additions and strikethrough deletions:  "This alternative would provide resource protection for livestock grazing by maintaining forage utilization at proper use, while allowing low impact to rangeland health. However, there would be see a 3-4 percent anticipated loss of AUMs from mineral development and the least number of acres treated for improvements under rangeland improvement management	Section 4.7.2.6.1 in the PRMP/FEIS has been revised as suggested.

Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				<p>actions."</p> <p>It is not accurate to state that livestock grazing harms rangeland health. The RMP provides little resource protection for grazing and leaves an operator vulnerable to conflicts with big game and wild horses, inability to manage or use riparian areas and water resources, while being subject to arbitrary standards that are applied without regard to the site.</p>	
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	LG83 (R-AT9)	<p>Modify the following statement as indicated by the strikethrough deletions:</p> <p>"Alternative D-No Action would provide the least number of acres for fire treatment, and produce the greatest long-term adverse impacts to rangeland health. This alternative would provide for rangeland improvements greater than Alternative A, but less than Alternatives B and C."</p> <p>This paragraph contradicts most other portions of the DEIS. It is not clear why the BLM would conclude Alternative D would not benefit rangeland health when elsewhere it has the largest number of acres subject to vegetation treatment. Moreover, rangeland health standards are enforced by rule and apply to Alternative D. The statement is inaccurate.</p>	Section 4.7.2.6.4 in the PRMP/FEIS has been revised as suggested.

Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33 LG220 (R-LG18)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Use would be allowed in both quantity and timing that would not result in a downward shift in rangeland health and/or production. BLM would work cooperatively to affect effect a grazing strategy specific to a grazing permittee's individual grazing allotment(s), commit to fund and implement appropriate range improvements; and make changes to the grazing authorizations as appropriate within the limits of the existing permit and in accordance with the grazing regulations. In the case of drought, the last recourse for BLM would be to temporarily close the range, or portions of it, to livestock grazing."</p>	<p>The Fire, Drought, and Natural Disasters subsection of Table 2.1.1 in the PRMP/FEIS (Management Common to All Alternatives) in the PRMP/FEISPRMP/FEIS has been revised to read as follows:</p> <p>"Use would be allowed in both quantity and timing that would not result in a downward shift in rangeland health. BLM would work cooperatively to affect a grazing strategy specific to a grazing permittee's individual grazing allotment(s), commit to fund and implement appropriate range improvements; and make changes to the grazing authorizations as appropriate within the limits of the existing permit and in accordance with the grazing regulations. In the case of drought, the last recourse for BLM would be to temporarily close the range, or portions of it, to livestock grazing."</p>
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33 LG239 (R-LG38)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Restore, maintain and/or improve rangeland conditions and productivity to maintain, meet or make substantial progress towards meeting rangeland health standards while meeting forage obligations in grazing permits and grazing preference decisions, as well as wildlife and wild horse habitat. while providing for its use and development. Maintain, improve, and/or restore habitat for</p>	<p>Table 2.1.12 (Rangeland Improvements) in the PRMP/FEISPRMP/FEIS has been revised to read as follows:</p> <p>Restore, maintain and/or improve rangeland conditions and productivity to maintain, meet or make substantial progress towards meeting rangeland health standards while meeting forage obligations in grazing permits and grazing preference decisions, as well as wildlife habitat.</p>

Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			<p>wildlife; provide optimum forage for livestock; maintain healthy watersheds and vegetation communities; and promote sustained yield and multiple use."</p> <p>The change would reflect both the rules and FLPMA policies that livestock grazing is a principal multiple use to be protected.</p>	
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	<p>LG250 A (-LG49)</p> <p>RE: Alternative A—Delete the following statement:</p> <p>"..phenology-based use system would have minimal impacts on rangeland health. 137,838 AUMs allocated to livestock, a 5.7% AUM reduction compared to alternative D."</p> <p>The RMP fails to document or justify the livestock grazing reduction.</p>	<p>Table 2.2.7 (Livestock and Grazing) in the PRMP/FEIS for Alternative A has been revised as follows:</p> <p>"Phenology-based use system would have positive impacts on rangeland health."</p> <p>The reduction is based off of the relinquishment of AUMs from the TNC, and the RMEF, which is stated in Table 2.1.6 (Forage – All Locations). No other reductions are proposed.</p>
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	<p>LG251 (R-LG50)</p> <p>RE: Alternative A—Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"It is projected that about Rangeland improvements would treat 34,640 acres of forage rangeland would be treated, build 69 miles of fence, construct 812 guzzlers/reservoirs, and develop 51 spring/wells for long term beneficial impacts on livestock and wildlife/ wild horse grazing."</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal</p>

Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			The acres of rangeland are not equal to forage. The discussion is confusing, since it refers to range improvements in terms of acres and then refers to structures, which are also range improvements. In addition, these projected projects should not be considered a ceiling. Finally the RMP never explains the reasons for reducing both range improvements and vegetation treatment from what is planned for Alternative D or the Current Direction and Alternative A.	<p>opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p> <p>Table 2.2.7 (Livestock and Grazing) in the PRMP/FEIS has been revised to incorporate the suggested change for Alternative A.</p>
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	<p>LG276 (R-LG75)</p> <p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Rangeland improvements that include vegetation treatments and fencing may would have short-term adverse impacts on vegetation caused by construction, surface disturbances, but would have long-term beneficial impacts on vegetation by improving distribution of grazing animals, restricting livestock, restoring natural vegetation communities, and eliminating weeds. Guzzlers and reservoir development would tend to have long-term adverse impacts on vegetation by concentrating livestock and attracting wildlife and wild horses in those areas, with subsequent disturbance and degradation of vegetation communities. These effects are mitigated in</p>	<p>Section 4.16.2.7.4 in the PRMP/FEIS has been revised to read as follows:</p> <p>"Rangeland improvements that include vegetation treatments and fencing would have short-term adverse impacts on vegetation caused by construction, but would have long-term beneficial impacts on vegetation by improving distribution of grazing animals, restoring natural vegetation communities, and eliminating weeds. Guzzlers and reservoir development would tend to have long-term adverse impacts on vegetation by concentrating livestock and attracting wildlife and wild horses in those areas, with subsequent disturbance and degradation of vegetation communities."</p>

Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				AMPs or grazing plans."  Range improvements do not "restrict livestock" as written but facilitate proper grazing by encouraging livestock to water and graze outside of riparian areas.	
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	LG283	Add the following statement:  Grazing is an important economic and cultural resource and the BLM goal is to maintain and enhance the industry by retaining full historic grazing preference through management prescriptions and forage for wildlife and wild horses.	Table 2.1.8 (Livestock and Grazing Management) in the PRMP/FEIS/PRMP/FEIS has been changed to read as follows:  "Achieve appropriate utilization of the range by livestock and wildlife through management prescriptions and administrative adjustments."
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	LG290	Modify the following statement as indicated by bolded additions:  "Activities associated with the exploration and development of mineral resources would have impacts on livestock grazing that would result in: 1) the temporary loss of vegetation and/or the loss of land available for grazing; 2) the possible disruption of livestock practices; and 3) the possible loss of grazing capacity due to changes in land management. These are minor, unless well densities are higher than projected, and are routinely mitigated. Reclamation can result in more palatable forage Livestock grazing and the development of oil and gas and coal bed methane, deposits are assumed to be	Section 4.7.2.3 in the PRMP/FEIS has been revised to read as follows:  "Activities associated with the exploration and development of mineral resources would have impacts on livestock grazing that would result in: 1) the temporary loss of vegetation and/or the loss of land available for grazing; 2) the possible disruption of livestock practices; and 3) the possible loss of grazing capacity due to changes in land management. These are minor, unless well densities are higher than projected, and are routinely mitigated. Reclamation can result in more palatable forage Livestock grazing and the development of oil and gas and coal bed natural gas, deposits are assumed to be generally compatible uses in most cases, as

Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			generally compatible uses in most cases, as exploration activity would be short-term and extraction activities and impacts are expected to have relatively small footprints for equipment and machinery. Development of phosphate, Gilsonite, tar sands, and oil shale resources would result in the long-term removal of lands from grazing activity to a greater extent than the above resource extraction processes. Presently, it does not appear that there is a viable market for tar sands or oil shale. In general, livestock grazing on rangeland would be expected to continue at some level during the development of oil and gas, and coal bed resources, which mitigates displacement."	exploration activity would be short-term and extraction activities and impacts are expected to have relatively small footprints for equipment and machinery. Development of phosphate, Gilsonite, tar sands, and oil shale resources would result in the long-term removal of lands from grazing activity to a greater extent than the above resource extraction processes. In general, livestock grazing on rangeland would be expected to continue at some level during the development of oil and gas, and coal bed resources, which mitigates displacement."
Draft RMP/EIS	Center for Native Ecosystems	O-38	LG180 (JLG-7)	<p>Allowing grazing to threaten special status species under all of the alternatives is irresponsible and violates NEPA. The Grazing in River Corridors section on page 2-19 is completely vague and non-committal about how grazing in this most potentially damaging area will be addressed. Page 2-32 presents two yellow-billed cuckoo prescriptions that are completely contradictory: "Fence riparian areas to reduce or eliminate grazing pressure on young trees, especially willow and cottonwood;" and "Apply rotation grazing or consider eliminating hot-season grazing in riparian areas to allow young trees to become established." Which is it, will grazing be allowed or not in riparian areas?</p> <p>Additional management actions related to riparian corridors can be found in Table 2.1.16 (Riparian Resources) in the PRMP/FEIS . This table provides information regarding management prescriptions and stipulations for grazing within riparian corridors.</p> <p>The prescriptions regarding yellow-billed cuckoo are not contradictory. The prescriptions would be implemented on a case-by-case basis, applying the prescription most appropriate to the situation; fencing, which creates its own level of environmental disturbance, may be less desirable in some situations that rotation grazing or seasonal restrictions, which are actions involving less</p>

**Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				<p>BLM must seriously consider impacts of grazing on each special status species and provide real mitigation.</p>	<p>disturbance.</p> <p>The analysis of anticipated impacts of grazing management decisions on special status is provided in Sections 4.15.1.2 and 4.15.2.2. Anticipated mitigation for impacts on special status species from all activities is outlined in Section 4.15.3.</p> <p>Section 4.15.3 in the PRMP/FEIS has been revised to add additional mitigations for grazing and other activities for special status species in Section 4.15.3.</p>
Draft RMP/EIS	Ranges West	O-43	LG149 (ALG-16)	<p>What is the definition of the terms phenology, billed use, adjudicated and permitted as used in this table? These terms are used again on page 2-86, Table 2.5, and 4-166 to specify available livestock AUMs.</p> <p>There apparently is no explanation in this draft RMP (that I could find) to discuss these so-called "systems" for allocating livestock forage.</p>	<p>The terms are used in Table 2.3 of the Draft RMP as simple headings referring to the basis, by alternative, for the specific management actions related to livestock and grazing seasons of use that are outlined in the table. "Phenology" refers to the management of livestock grazing based upon the physiological requirements of forage/vegetation. "Billed Use" refers to management based upon how the permittees are actually billed, regardless of phenology. "Adjudicated" refers to management of livestock grazing based upon the 1960s adjudication of seasons of use. "Permitted" refers to the management of livestock grazing seasons of use as outlined under the current permits. Clarification of these terms has been added as a footnote to Table 21.8 (Livestock and Grazing Management) in the PRMP/FEIS.</p>

**Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Ranges West	O-43	LG156 A (ALG-23)	The differences in wording regarding key species vs. woody species are significant and could lead to very troublesome interpretations by staff.	Table 2.1.6 (Riparian Resources) in the PRMP/FEIS and Section 4.15.2.2.1 in the PRMP have been revised to correct a discrepancy between woody and herbaceous species.
Draft RMP/EIS	Ranges West	O-43	LG161 (ALG-28)	The analysis of impacts to soil and water and vegetation resources indicates that the AUM allocation (Alt A) and the grazing use limits of 30% "riparian vegetation" would adversely impact soils and vegetation. Yet on page 2-108 the AUM allocations and the "30% riparian vegetation" use limit would be beneficial to habitat and wildlife resources. These are contradictory conclusions and illogical. Grazing under Alternative A is subject to Rangeland Health Standards which assures healthy riparian and upland habitat or soils and vegetation.	Table 2.2.14 (Soils and Water Resources) in the PRMP/FEIS has been revised to accurately describe the impacts (30% limitations would be more beneficial than the No Action alternative). The Preferred Alternative has been revised to read as follows:  "30% forage utilization of riparian areas would benefit soils through reduction in loss of cover and trampling and subsequent sedimentation."
Draft RMP/EIS	Ranges West	O-43	LG164 (ALG-31)	The last sentence of this paragraph does not compute: "Minor indirect impacts as a result of implementation of Alternative A would occur to the ranching community but not individual ranchers due to the reduction in AUMs". In the 5th paragraph, last sentence, it states just the opposite.	Section 4.7.2.2.1 in the PRMP/FEIS has been revised to clarify the analysis.  The point of the statement in question is that the reduction in AUMs would be spread across permit holders and would not be targeted at any one holder.
Draft RMP/EIS	Ranges West	O-43	LG166 (ALG-33)	This is an inappropriate assumption regarding Alternative C. Rangeland health standards apply equally to all alternatives as per the CFRs and BLM policy.	Section 4.7.2.2.3 in the PRMP/FEIS has been revised to delete the statement beginning with "...rangeland health would be the driving force".
Draft RMP/EIS	Ranges West	O-43	LG167 (ALG-	Contradictory statements in 2nd paragraph, next to last sentence and 3rd paragraph,	Section 4.7.2.6.3 in the PRMP/FEIS has been revised to correct the contradictory statement

**Table 5.13g. Comments Requiring a Change in the Document: Grazing and Livestock**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
			34)	last sentence. Either Alternative D will maintain rangeland health or it won't.	as suggested
Draft RMP/EIS	Ranges West	O-43	LG171 (ALG-39)	1st paragraph, last sentence- Biased statement that assumes any foraging subjects soils to erosion. No science base to this statement. Rangeland ecosystems evolved with large animal grazing and animal foraging on vegetation is a natural and fundamental biological process. Grazing is functionally positive or negative to vegetation depending on many things such as intensity and timing.	Section 4.13.1.3 in the PRMP/FEIS has been revised to clarify that foraging has the potential to impact soils but that it is not a given.
Draft RMP/EIS	Ranges West	O-43	LG172 (ALG-40)	This paragraph is eco-bio gobbledygook with only a selective-science basis. Grazing is a fundamental biologic process at the base of the natural food chain. It is not something man invented to assault nature. Herbivory is functional to plants in many ways that the author of this paragraph apparently never noticed, such as enhanced seed germination and transport, planting, fertilizing, tillering and subsequent increase in reproductive stalks. The effects of grazing can range from positive to negative depending on amount, timing, species of plant and the grazing animal, etc. The statement in this paragraph is, at best, unprofessional and more likely dangerous.	Section 4.15.1.2 in the PRMP/FEIS has been modified for clarity.

Table 5.13h. Comments Requiring a Change in the Document: Hazardous Materials

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	HZ2	<p>The RMP should address hazardous materials issues that may arise due to proposed oil, gas, and mineral development. Management of waste water withdrawn to recover methane resources should also be addressed. No waste waters should be discharged until a UPDES permit is obtained. Such discharges must not exceed 1200 mg/l TDS under current rules. However, salinity in the Colorado river would be much improved if no waters exceeding 300 mg/l TDS were discharged. Such waters should also be managed to prevent thermal loading to surface waters. No waters which exceed 270C, nor which raise the temperature of the receiving water body 40C or more, shall be discharged to a warm water fishery. No waters which exceed 200C nor which raise the temperature of the water body 20C or more shall be discharged to a cold water fishery.</p>	<p>The discussion of the potential impacts from hazardous materials associated with minerals and energy development can be found in Section 4.5 of the PRMP/FEIS.</p> <p>Language acknowledging the potentially hazardous nature of wastewater resulting from methane recovery operations has been added to the section.</p> <p>As described in Section 3.5, the BLM adheres to EPA policy regarding hazardous materials, which includes wastewater discharge.</p> <p>Any permit requestor would have to meet the requirement of either the State or EPA, as appropriate, in order to be issued a permit. The proposed language specific to permitting requirements is not necessary as permit requirements may change in the future. Also, the permit requirements are associated with State of Utah requirements, and EPA has primacy over a large area of the Field Office in this program, not the State.</p>
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	HZ4 (RHZ-1)	<p>We suggest the following revisions to this paragraph</p> <p>"Where appropriate, the RMP would address will identify hazardous materials issues that are regulated by the state but which may arise due to proposed oil, gas, and mineral development."</p>	<p>Section 1.7.4 of the PRMP/FEIS has been revised as follows:</p> <p>"Where appropriate, the proposed RMP will identify hazardous materials issues that may arise due to proposed oil, gas, and mineral development."</p>

**Table 5.13h. Comments Requiring a Change in the Document: Hazardous Materials**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment

**Table 5.13i. Comments Requiring a Change in the Document: Lands and Realty**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
Draft RMP/EIS	Duchesne County	G-9 LR1	"No lands acquired through land tenure adjustments would be classified or opened for agricultural entry or leasing in the RMP planning area."  At a minimum, Duchesne County would request the addition of the bolded phrase into this sentence. However, Duchesne County questions whether such restrictions should be imposed across the board.	The suggested wording change has been made in Table 2.1.7 (Lands and Realty Management) of the PRMP/FEIS under the subsection entitled Land Tenure Adjustments (LTAs).
Draft RMP/EIS	UBAOG	G-22 LR6	In the last sentence, the stated acreage of 35,462 does not match the acreage shown on Figure 6, which states 54,031 acres. There should be a table developed which lists these tracts by their location as it is not possible to determine from the map which tracts these are.	Table 2.1.7 (Lands and Realty Management) of the PRMP/FEIS under the subsection entitled Disposals has been revised to match the acreage stated on Figure 6. Specific tracts of land suitable for disposal will be identified at the time a specific disposal or exchange is proposed, and the potential impacts of that disposal or exchange will be assessed through site-specific NEPA processes and documents.
Draft	UBAOG	G-22 LR7	Non-federal lands to be acquired through both	Table 2.1.7 (Lands and Realty Management) of

**Table 5.13i. Comments Requiring a Change in the Document: Lands and Realty**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS				<p>Bureau-and public-initiated exchanges must have at least one of the following characteristics:</p> <p>Add after "exchanges must":</p> <p>"be in the public interest and have at least one of the following characteristics"</p> <p>FLPMA does not recognize efficiency as a criterion for land acquisition; instead it must be in the public interest.</p>	the PRMP/FEIS under the subsection entitled Exchanges/Acquisitions has been revised as suggested.
Draft RMP/EIS	Ute Tribe of the Uintah and Ouray Reservation	G-26	LR14	The Ute Indian Tribe of the Uintah and Ouray Reservation (Ute Tribe) has previously informed the Vernal Office of the BLM of the need to have the RMP and EIS for the Vernal Field Office discuss the law relating to access to the surface estate of the Ute Tribe. Despite these previous requests, the RMP is completely silent concerning surface access to tribal lands. The Ute Tribe requires acknowledgements of its rights as a surface owner within the area of the RMP. Failure to set forth these rights within the text of the RMP will render the document incomplete and inadequate.	<p>Acreages under jurisdiction of the Ute Tribe are included in Table 1.1; however, language has been added to Section 1.4.1 of the PRMP/FEIS clarifying the role of the Ute Tribe as holder of surface estate within the area to be managed through the RMP.</p> <p>See comment response LR37.</p>
Draft RMP/EIS	Ute Tribe of the Uintah and Ouray Reservation	G-30	LR37	The Ute Tribe is a Cooperating Agency in the revision of the RMP. Despite this status, the Ute Tribe does not believe that its concerns about land use affecting tribal lands have been addressed in the RMP process. As the owner or administrator of much of the surface area within	<p>The following language has been added to Section 1.4.1 of the PRMP/FEIS:</p> <p>"Decisions and actions of the RMP only fully apply to BLM lands. In cases of split estate lands, such as lands within the planning area</p>

Table 5.13i. Comments Requiring a Change in the Document: Lands and Realty

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				the planning area, the Ute Tribe is entitled to consent to any rights-of-way or other surface uses of these lands. The Tribe is also interested in assuring the proper and efficient development of tribal minerals, while protecting the interests of the Tribe and its members. While BLM officials have been supportive of the Tribe's concerns in private conversations, the RMP does not include any discussion of those concerns, or analysis of how best to address those concerns. The Ute Tribe is frankly worried that the RMP process will be used to justify land development processes that are inconsistent with the special status of tribal lands. The Ute Tribe again requests that the RMP include a clear acknowledgement of the rights of the Ute Tribe to manage access to tribal lands, and a discussion of the process by which the Ute Tribe and the BLM will cooperate in the management of their respective land bases.	that are split between the BLM and the Uintah & Ouray Indian Tribe, actions affecting the surface must be coordinated with the surface owner. Undertakings conducted on lands not wholly or partly administered by the BLM are subject to the laws, regulations, conditions, and policies of the relevant land management agency or other landowner."
Draft RMP/EIS	IPAMS	O-14	LR13 (LLR-1) (JLR-5)	Lands managed by the State of Utah Division of Wildlife Resources have also not been accurately portrayed within Figure 1 (Land Ownership) of the RMP. The School and Institutional Trust Lands Administration (SITLA) website contains an accurate map of these lands within the planning area. Alternatively, a map can be obtained directly from the Division. These lands need to be accurately portrayed because of development restrictions inherent to them.	Figure 1 has been updated to reflect the State of Utah's land ownership as indicated on maps obtained from the SITLA website.
Draft	Lexco	O-24	LR13	Lands managed by the State of Utah Division of	Figure 1 has been updated to reflect the State

**Table 5.13i. Comments Requiring a Change in the Document: Lands and Realty**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
RMP/EIS		(LLR-1) (JLR-5)	Wildlife Resources have also not been accurately portrayed within Figure 1 (Land Ownership) of the RMP. The School and Institutional Trust Lands Administration (SITLA) website contains an accurate map of these lands within the planning area. Alternatively, a map can be obtained directly from the Division. These lands need to be accurately portrayed because of development restrictions inherent to them.	of Utah's land ownership as indicated on maps obtained from the SITLA website.
Draft RMP/EIS	Westport Oil and Gas Company	O-28 LR13 (LLR-1) (JLR-5)	Lands managed by the State of Utah Division of Wildlife Resources have also not been accurately portrayed within Figure 1 (Land Ownership) of the RMP. The School and Institutional Trust Lands Administration (SITLA) website contains an accurate map of these lands within the planning area. Alternatively, a map can be obtained directly from the Division. These lands need to be accurately portrayed because of development restrictions inherent to them.	Figure 1 has been updated to reflect the State of Utah's land ownership as indicated on maps obtained from the SITLA website.
Draft RMP/EIS	Enduring Resources	O-40 LR18 (JLR-1)	DEIS says" This RMP recognizes existing right of way corridors...and would designate additional corridors subject to physical barriers and sensitive resource values." What are "sensitive resource values"?	Sensitive resource values such things as T&E species, cultural and paleontological resources, sensitive soils, riparian areas, areas of high VRM classification, etc.  Language has been added to Table 2.1.7 (Lands and Realty Management) of the PRMP/FEIS under the subsection entitled Transportation/Utility Corridors to read as follows:

Table 5.13i. Comments Requiring a Change in the Document: Lands and Realty

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					"Sensitive resource values would include, but are not limited to, threatened and endangered species habitat, cultural and paleontological resources, sensitive soils, riparian areas, areas possessing high scenic quality, and areas of critical environmental concern."

Table 5.13j. Comments Requiring a Change in the Document: Minerals and Energy

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	UBAOG	G-22	ME24	It is impossible to find a corresponding classification (combined hydrocarbon areas) on the maps. What are combined hydrocarbon areas; are they the combined areas set forth in figures 11-14? Are they oil shale and tar sands? Do they include oil and gas and coal bed methane? The acreage figures on page 2-7 for open standard lease, open controlled surface and open NSO, don't reconcile with the combination of the other numbers on page 2-7 for the other minerals. In short, the whole Minerals section is confusing when it comes to clear classification of mineral classes' types and when it comes to acreage figures.	<p>Figures 15-18 in the PRMP/FEIS have been revised to correct the acreage figures and to show Special Tar Sand Area leases.</p> <p>Combined Hydrocarbon areas are the areas designated as Special Tar Sand Areas, which are not shown in Figures 15-18 (can somewhat be implied from leasing decisions). Coal Bed natural gas is considered to be part of the oil and gas estate.</p> <p>All decisions related to oil shale and tar sands leasing in this PRMP/FEIS are being deferred to the ongoing PEIS for Oil Shale and Tar Sands Leasing. For more information please see Section 1.10.9.</p>

**Table 5.13j. Comments Requiring a Change in the Document: Minerals and Energy**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	UBAOG	G-22	ME26	This paragraph fails to mention that these resources are located in an EPCA focus area.	Section 3.8.1.1.1 in the PRMP/FEIS has been revised mineral and energy resources are located in the EPCA focus area.
Draft RMP/EIS	UBAOG	G-22	ME37	Here it states "operators have demonstrated a willingness to comply with spatial and temporal restrictions." Strike this sentence as it is not true. The restrictions have been a point of contention since they were imposed and throughout the RMP process. Such acceptance does not equal an analysis of impacts such as affect on RFD and socio-economics.	Section 4.8.2.7 in the PRMP/FEIS has been revised to read as follows:  "Operators have complied with..."
Draft RMP/EIS	UBAOG	G-22	ME39	When reviewing protection of raptors in the guidelines, BMP, Matrix, Appendix K, and here, the ability to modify Raptor Guidelines and Practices is confusing. In Appendix K, modifications are not permitted. Perhaps some wordsmithing would help, as it appears the word modification used in Appendix K stipulation descriptions are the same as discussed here.	All sections in the PRMP/FEIS relating to raptors have been revised or clarified.
Draft RMP/EIS	Ute Tribe of the Uintah and Ouray Reservation	G-26	ME63	Page 3-39 identifies six RFD areas within the VPA that were evaluated for potential energy resources. It should be noted in the RMP/EIS that the Uintah & Ouray Indian Reservation is located in portions of the East and West Tavaputs Plateau, Monument Butte-Red Wash, Altamont-Bluebell, and Tabiona-Ashley Valley RFD areas. Oil and gas, CBNG, tar sands, and	Section 1.4.1 in the PRMP/FEIS has been revised to read as follows:  "Decisions and actions of the RMP only fully apply to BLM lands. In cases of split estate lands, such as lands within the planning area that are split between the BLM and the Uintah & Ouray Indian Tribe, actions affecting the surface

Table 5.13j. Comments Requiring a Change in the Document: Minerals and Energy

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				mineral materials, such as sand gravel and building stone are potentially present within Reservation boundaries. The RMP/EIS should specify that all Tribal laws, regulations, conditions, and stipulations, would apply to energy and mineral resources, if operations are conducted on tribal land within the VPA.	must be coordinated with the surface owner. Undertakings conducted on lands not wholly or partly administered by the BLM are subject to the laws, regulations, conditions, and policies of the relevant land management agency or other landowner."
Draft RMP/EIS	Ute Tribe of the Uintah and Ouray Reservation	G-26	ME65	Page 4-98 states that the impacts of leasing of minerals would be beneficial to the Ute Tribe, including rentals or fees from the use of surface permits or other rights-of-way. However, it does not state that there would also be adverse impacts, including those to cultural resources, e.g. sacred sites, medicinal plants, and ancestral hunting grounds.	Section 4.8 in the PRMP/FEIS has been revised to add a footnote explaining that impacts from minerals leasing are discussed in other resource chapters as part of the area analysis.
WSA Supplement	Ute Tribe- Energy & Minerals Department	G-172	3	As discussed in Section 4.21.2.3 - Impacts of Lands and Realty Management Decisions on Non-WSA Lands with Wilderness Characteristics (see pg. 4-153), under Alternative E, non-WSA lands with wilderness characteristics would be managed as ROW exclusion areas. Exclusion from future ROW development would protect the natural character of the landscape of all the non-WSA lands with wilderness characteristics.  The Tribe recognizes that the BLM is encouraged to preserve land in its natural condition. The Tribe also recognizes that a	The BLM does provide for reasonable access to all non-BLM managed lands under all alternatives. Information will be added to Chapter 2, Lands and Realty, Management Common to all action alternatives, that states that reasonable access to non-BLM managed land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way.

**Table 5.13j. Comments Requiring a Change in the Document: Minerals and Energy**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			<p>parcel of land cannot be preserved in its natural character and mined at the same time. However, case law supports the Tribe's claimed right of access. In fact, without access the Tribe could not develop its minerals in any fashion and they would become economically ineffectual.</p> <p>Based upon this information, the Tribe requests that the BLM consider adding the following information to the Vernal Supplemental RMP.</p> <p>Where necessary, the BLM would grant reasonable access across Federal lands with wilderness characteristics to provide for development of adjacent Tribal lands and minerals.</p> <p>Where necessary, the BLM would grant reasonable access to Federal lands with wilderness characteristics to provide for development of Tribal/Indian Allotted minerals, which are held in split estate (i.e., Tribal minerals and Federal surface with wilderness characteristics areas).</p>	

**Table 5.13k. Comments Requiring a Change in the Document: Minerals – Leasable**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
WSA Supplement	Utah State Office of Education, School Land Trust	G-169	7	<p>We are concerned about the cutting off of access and how it devalues in-held school land. For the BLM not to develop oil &amp; gas in its sections also makes it impractical for development to occur on ours, which amounts to an unconstitutional taking. This is true where there are known resource, and may become true for areas in which no drilling has occurred. Alternative E would directly harm us in this area because "about 187,000 acres of State of Utah lands could be rendered uneconomic to lease because they would be surrounded by unleaseable federal lands." (4-31) This includes about 19,200 acres with coal resources that are currently unleased, which would be eliminated from further consideration for coal leasing.</p> <p>If the BLM decides that large areas of its land are off limits for drilling, that can effectively prevent feasible drilling on our in-held sections, amounting to a taking of the mineral value of our subsurface resources.</p> <p>The BLM should consider whether it will allow directional drilling from leases on school sections to access oil and gas lands on BLM property, with no surface occupancy of the BLM property. The BLM has stated "Oil and gas development in</p>	<p>The BLM does provide for reasonable access to all SITLA lands under all alternatives. Information will be added to Chapter 2, Lands and Realty, Management Common to all action alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79).</p> <p>The BLM will consider whether it will allow directional drilling from leases on school sections to access oil and gas lands on BLM property. It is up to the lease holder to determine the feasibility of directional drilling projects. The proportion of the resource that could be reached are dependent upon a number of factors (i.e. geology of the subsurface, capability of the drilling equipment, skill level of the drilling crew, economics of directional vs. straight drilling, etc.)</p>

**Table 5.13k. Comments Requiring a Change in the Document: Minerals – Leasable**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				these areas would require directional drilling to extract hydrocarbon resources." (4-48). Analysis should be made on how feasible this would be, and what proportion of the resources could be reached in this way.	

**Table 5.13l. Comments Requiring a Change in the Document: Minerals – Oil and Gas**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Duchesne County	G-9	ME31	The analysis concludes that Alternative C would reduce long-term adverse impacts on the Oil, Gas and CBNG resources "by ensuring that the resource was available to support a viable, long-term mineral industry." This conclusion is based on the assumption that minerals that cannot be used today could be used in the future. However, there is no guarantee that lands deemed unsuitable for such use under Alternative C today will ever be made available for future resource extraction, that other sources of energy may be developed and the National immediate energy need.	Section 4.8.2.1.3.1 in the PRMP/FEIS has been revised to delete the statement in question.
Draft	Duchesne	G-9	ME42	The statement that none of the alternatives would result in more than a 0.4% net decrease	Sections 4.8.3 and 4.8.4 in the PRMP/FEIS

**Table 5.13l. Comments Requiring a Change in the Document: Minerals – Oil and Gas**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS	County			in the number of predicted oil and gas wells is deceiving. Based on the information in Tables 4.8.2, 4.8.3, 4.8.4 and 4.8.5, Alternatives A, B and C all provide more opportunity for oil and gas well drilling than Alternative D. However, the difference between Alternatives B and C is about 2.5%.	have been revised to read:  "Under all action alternatives there would be a net increase in the number of predicted oil, gas, and CBNG wells as compared to the No Action alternative."
Draft RMP/EIS	USFS— Ashley National Forest	G-19	GC88 (LGC-3)	Clarify what NEPA analysis would occur for those areas considered available for oil and gas leasing. Will it be site-specific?	Section 4.8.1.2 in the PRMP/FEIS states that additional NEPA analysis requirements for locatable minerals. Similar language has been added to Section 4.8.1.1 to describe the level of NEPA analysis required for oil and gas development.
Draft RMP/EIS	UBAOG	G-22	ME17	1st sentence Insert between "applied to leases" and "in the form" "issued after the date of this RMP" 2nd sentence strike "generally reflect the minimum requirements" and replace with "are necessary to protect the resource and would contain provisions/criteria to allow for waiver and modification if warranted."	Section 2.4.8.2.1 in the PRMP/FEIS has been revised to read as follows:  "Mitigation of oil and gas impacts developed under the plan and applied to leases issued after the record of decision in the form of stipulations would adhere to BLM's standard format. Stipulations generally reflect the minimum requirements necessary to protect or minimize the impacts to the resource and would contain provisions/criteria to allow for waiver and modification if warranted."
Draft RMP/EIS	UBAOG	G-22	ME31	The analysis concludes that Alternative C would reduce long-term adverse impacts on the Oil, Gas and CBNG resources "by ensuring that the resource was available to support a viable, long-term mineral industry." This conclusion is based on the assumption that minerals that cannot be used today could be used in the	Section 4.8.2.1.3.1 in the PRMP/FEIS has been revised to delete the statement in question.

Table 5.13I. Comments Requiring a Change in the Document: Minerals – Oil and Gas

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				future. However, there is no guarantee that lands deemed unsuitable for such use under Alternative C today will ever be made available for future resource extraction, that other sources of energy may be developed and the National immediate energy need.	
Draft RMP/EIS	UBAOG	G-22	ME42	The statement that none of the alternatives would result in more than a 0.4% net decrease in the number of predicted oil and gas wells is deceiving. Based on the information in Tables 4.8.2, 4.8.3, 4.8.4 and 4.8.5, Alternatives A, B and C all provide more opportunity for oil and gas well drilling than Alternative D. However, the difference between Alternatives B and C is about 2.5%.	Sections 4.8.3 and 4.8.4 in the PRMP/FEIS have been revised to read:  "Under all action alternatives there would be a net increase in the number of predicted oil, gas, and CBNG wells as compared to the No Action alternative."
Draft RMP/EIS	UBAOG	G-22	ME44	This section implies that water used for drilling may impact the species. Given the number of wells proposed in the RFD to be drilled each year, the amount needed would be approximately 181 acre feet each year. As this water is taken from various locations throughout the VPA as well as the fee and Indian lands, the impact would be small and that fact should be listed here.	Section 4.15.1.3 in the PRMP/FEIS has been revised to show the acre-feet of water per well.  The commenter does not indicate how they calculated 181 acre- feet per year. BLM estimates that approximately .075 acre- feet of water per well is needed based on current trends. With an estimated 6,530 wells anticipated during the life of the plan this would total 4,897 acre -feet of water.
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	GC23	It should be made clear in the Record Of Decision (ROD) and the final RMP that the total number of wells cited in reasonable foreseeable development do not represent a ceiling or cap on the number of wells that can be drilled in the VRA during the life of the plan. The ROD and RMP should state that the RFD well total were	Additional text has been added Section 4.1.2 in the PRMP/FEIS to describe the role of the RFD as a general metric used to assess relative impact and does not represent a ceiling on the number of wells that can be drilled within the VPA during the life of the RMP. The additional

Table 5.13I. Comments Requiring a Change in the Document: Minerals – Oil and Gas

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				developed for the purpose of assessing impacts for decision making and that the total number of wells will be determined by NEPA analysis of field development projects of possible RMP revisions. This clarification is supported by case law.	text is as follows:  "It should be noted that the total number of wells cited in the RFD report do not represent upper limits on the number of wells that could be drilled in the VPA during the life of the plan. The RFD well totals were developed for the purposes of assessing impacts for decision-making. The total number of wells permitted will be determined through site-specific NEPA analysis of field development projects."
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	ME55	<p>The DEIS/RMP fails to properly disclose the impacts of the proposed management prescriptions on mineral development. It appears that Table 5.1 on 5-3 and Table 4.8.1 on page 4-100 was an attempt to disclose these impacts as at 4.8.2.1.1.1 the text presents these changes form Alternative D, the no action alternative. These figures are simply a tabulation of acres assigned to each leasing category and not a disclosure of impacts required in IM 2004-089 on FRD. In the Chapter 4 analysis it is the only data presented to show impacts on oil and gas development with respect to the loss of wells and acreage for future development.</p> <p>IM 2004-089 requires the creation of a baseline of well numbers and acres that would be developed if such development were governed by BLMs standard lease form. As management prescriptions are proposed the baseline is to be</p>	<p>Section 4.8 (Minerals and Energy Resources) discusses the effects of cultural, reaction, Soils, Special Status Species, Wildlife, and Visual decisions on mineral development. Section 4.8 has been revised to discuss impacts of Special Designations on mineral development.</p> <p>Chapter 4.12 Socioeconomics discusses the loss or gain of revenue from oil and gas development by alternative.</p> <p>The reduction of wells imposed by management prescriptions can be seen in Table 4.8.2 (Alternative A), 4.8.3 (Alternative B), 4.8.4 (Alternative C), 4.8.5 (Alternative D), and 4.8.6 (Alternative E).</p>

**Table 5.13l. Comments Requiring a Change in the Document: Minerals – Oil and Gas**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				reduced by the number of well and acres affected. The result of this analysis is a clear disclosure of the impact of proposed management restrictions on oil and gas development.	
Draft RMP/EIS	Questar	O-12	ME42	The statement that none of the alternatives would result in more than a 0.4% net decrease in the number of predicted oil and gas wells is deceiving. Based on the information in Tables 4.8.2, 4.8.3, 4.8.4 and 4.8.5, Alternatives A, B and C all provide more opportunity for oil and gas well drilling than Alternative D. However, the difference between Alternatives B and C is about 2.5%.	Sections 4.8.3 and 4.8.4 in the PRMP/FEIS have been revised to read:  "Under all action alternatives there would be a net increase in the number of predicted oil, gas, and CBNG wells as compared to the No Action alternative."
Draft RMP/EIS	IPAMS	O-14	ME42	The statement that none of the alternatives would result in more than a 0.4% net decrease in the number of predicted oil and gas wells is deceiving. Based on the information in Tables 4.8.2, 4.8.3, 4.8.4 and 4.8.5, Alternatives A, B and C all provide more opportunity for oil and gas well drilling than Alternative D. However, the difference between Alternatives B and C is about 2.5%.	Sections 4.8.3 and 4.8.4 in the PRMP/FEIS have been revised to read:  "Under all action alternatives there would be a net increase in the number of predicted oil, gas, and CBNG wells as compared to the No Action alternative."
Draft RMP/EIS	IPAMS	O-14	ME54	Appendices A and H must be rewritten; and, rather than instituting blanket stipulations, we recommend that BLM commit to developing stipulations (as well as the associated exception, waiver, and modification) for surface-disturbing activities resulting from oil and gas operations in cooperation with the oil and gas industry, other agencies, and other key stakeholders.	Appendices A and H in the PRMP/FEIS have been updated to reflect BMPs for Raptors and Their Associated Habitats in Utah, IM UT 2006-096.

Table 5.131. Comments Requiring a Change in the Document: Minerals – Oil and Gas

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
WSA Supplement	EOG Resources, Inc.	B-144	13	<p>EOG's non-federal lease holdings in the Kings Canyon area include Section 32, T10S-R19E and Section 32, T11S-R19E, both of which are partially bordered by areas determined by the BLM to exhibit wilderness characteristics. Access to each of these sections through areas not determined to have wilderness character may not be possible because of topographic features that preclude road construction or the nearby boundary of the Uintah and Ouray Reservation boundary.</p> <p>Implementation of the restrictions associated with Alternative E could unreasonably restrict EOG from accessing the non-federal leases described above, and/or possibly other non-federal leases that lie within the administrative boundary of the Vernal FO. The proposed restrictions include precluding the issuance of rights-of ways (ROWs) in areas determined to have wilderness characteristics. BLM cannot preclude EOG's right of access to its leases.</p> <p>The BLM must not indirectly disallow to its leases by the imposition of a designation that would exclude the issuance of ROWs. By possibly disallowing access to valid leases, the BLM selection of Alternative E would constitute an indirect taking and breach of EOG's lease terms.</p>	<p>The BLM does provide for reasonable access to all SITLA lands under all alternatives. Information will be added to Chapter 2, Lands and Realty, Management Common to all action alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79).</p> <p>(From Universal Comment response LAR-5R)</p> <p>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).</p> <p>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.</p>

**Table 5.13l. Comments Requiring a Change in the Document: Minerals – Oil and Gas**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					<p>§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.</p> <p>The BLM is aware that there are specific State laws relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA requires that BLM's land-use plans be consistent with State and local plans "to the extent practical" where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved. 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.</p>

**Table 5.131. Comments Requiring a Change in the Document: Minerals – Oil and Gas**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
WSA Supplement	Duchesne County Commission	G-10	14	Page 4-43, Section 4.8.2.8.2, management under Alternative E predicts a total of 6,117 oil, gas and CBNG wells, which appears in Table 4.12.1. However, this section (and Section 4.10.2.4.5) indicates that this is a 4% increase compared to 5,856 wells under Alternative D. Actually, Table 4.12.1 shows a predicted 6,331 wells under Alternative D, making Alternative E management result in a decrease of 214 wells or a 3.4% decrease (see Table 4.12.1). It is Duchesne County's position that such a decrease would violate the county land-use plan and EPCA.	Table 4.12.1 in the DRMP was inaccurate in the number of well potential by alternative. The FEIS will be corrected to reflect the correct numbers.  Alternatives A, B, C, and E all reflect a greater well potential than Alternative D due to the proposed availability of lands within the Hill Creek Extension for leasing, which is not the case in Alternative D.
WSA Supplement	Duchesne County Commission	G-10	20	Pages 4-66, 4-67, Section 4.12.3.2.5: The analysis in this Section 4.13.2.4.5 (Page 4-73) seems to be flawed in that it presumes Alternative E would increase the number of oil, gas and CBNG wells when compared to Alternative D, when actually Alternative E would result in 214 fewer wells according to Table 4.12.1 (6,331 wells in Alternative D versus 6,117 under Alternative E).	See comment response 10-O-14.
WSA Supplement	Duchesne County Commission	G-10	45	Pages 4-166 to Page 4-178, Table 4.21.1: Change heading "Oil & as Development Potential" to "Oil & Gas Development Potential".	The FEIS will reflect this correction.

**Table 5.13m. Comments Requiring a Change in the Document: Other**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	USFS—Ashley National Forest	G-19	GC89 (LCG-4)	Why are Wilderness and SSS subheadings of Soil and Water? These would be better relocated in separate sections so they can be readily found.	Table 2.1.20 (Special Designation – Wilderness Study Areas) has been given its own table in the PRMP/FEIS. Table 2.1.21 (Special Status Species) has been given its own table in the PRMP/FEIS.
Draft RMP/EIS	UBAOG	G-22	GC13	Add "Duchesne County Public Land Implementation Plan."	Section 1.10 in the PRMP/FIS has been revised to include the addition as suggested.
Draft RMP/EIS	UBAOG	G-22	GC15	We have previously asked that a description of surface-disturbing activities be included in the glossary.	The glossary in the PRMP/FEIS has been revised to include a definition of "surface disturbance activities."
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	GC25	The meaning of the statement "to the extent that BLM has the authority to do so" needs to be clarified.	Section 3.14.3.2 in the PRMP/FEIS has been revised to add language to clarify it relative to the authority bestowed upon the BLM by FLPMA, the Wild and Scenic Rivers Act, and BLM policy. This statement is also intended to acknowledge that the BLM does not manage all lands through which the proposed wild and scenic rivers pass and cannot impose restrictions on other land owners and land managers. The additional text is as follows:  'It is BLM policy (8351 Manual, Section .32C) to manage eligible segments to protect their free-flowing nature, outstandingly remarkable values, and tentative classifications to the extent that BLM has the authority to do so through FLPMA, the Wild and Scenic Rivers Act, and BLM policy.'
Draft RMP/EIS	PacifiCorp	O-7	GC132 (NAT3)	The VFO should conduct a review of the Western Regional Corridor Planning Partnership Priority Corridors (dated July	The following language has been added to Section 1.4.1 of the PRMP/FEIS:

Table 5.13m. Comments Requiring a Change in the Document: Other

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			2003) and include in the final RMP a discussion of any proposed corridors under Alternatives A, B, C, and D. The final RMP should also note that designated corridors apply only to BLM lands and do not include those portions that cross state and private lands.	<p>"Decisions and actions of the RMP only fully apply to BLM lands. In cases of split estate lands, such as lands within the planning area that are split between the BLM and the Uintah &amp; Ouray Indian Tribe, actions affecting the surface must be coordinated with the surface owner. Undertakings conducted on lands not wholly or partly administered by the BLM are subject to the laws, regulations, conditions, and policies of the relevant land management agency or other landowner."</p> <p>Presently, BLM is doing a national corridor EIS, which when complete, would amend this plan if there are inconsistencies or differences.</p>
Draft RMP/EIS	EOG Resources	O-17	GC57 (GC-N)	<p>The statements in Appendix K prior to the tabular presentation conflict with the actual approach to defining exceptions, modifications and waivers for a number of resource concerns listed in the table. The possibility for exception, modification, and waiver is defined as "none" for a number of resources. This arbitrary designation of "none" indicates a lack of flexibility which will likely result in less production of essential oil and gas supplies.</p> <p>Appendix K has been revised to reflect identified surface stipulations for the PRMP/FEIS.</p>
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	GC128 (R-GC6)	<p>The draft RMP and DEIS fail to define or properly use a number of key terms including "surface-disturbing activities" or "surface disturbance," "habitat fragmentation," and "habitat loss." These</p> <p>See comment response GC15 regarding surface-disturbing activities.</p> <p>See comment response GC59C regarding</p>

**Table 5.13m. Comments Requiring a Change in the Document: Other**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			<p>terms are used throughout the RMP and appear to contradict federal law, rules, BLM policy or case law. The Glossary should include the following definitions:</p> <p>Surface disturbance or surface-disturbing activities-"Disturbance from development activities that involve the removal of vegetation and topsoil, or overburden where there is a physical change to the surface, in connection with activities for mineral and energy development, rights-of-way, and road construction or reconstruction. It does not include incidental disturbances associated with the construction, reconstruction, or maintenance of fences or corrals or stock tanks, livestock or wildlife grazing, or recreation uses."</p> <p>Habitat Fragmentation – "An event that creates a greater number of habitat patches that are smaller in size than the original contiguous tract(s) of habitat."</p> <p>Habitat Loss – "The permanent or effectively permanent removal of habitat cover needed by a particular wildlife species." (This definition of habitat loss corresponds to how this concept is used in mainstream habitat management and avoids the need to attempt to define or regulate human disturbance or disruptive activities. The latter terms should not be regulated.)</p>	<p>habitat fragmentation.</p> <p>The glossary in the PRMP/FEIS has been revised to include a definition of "habitat loss" and "sustained yield."</p>

Table 5.13m. Comments Requiring a Change in the Document: Other

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				Sustained yield or sustainability "means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple uses." (This definition is appropriately taken from FLPMA, 43 U.S.C. §1702(h).)	
WSA Supplement	US EPA	G-6	25	Section 2.3.2.6. Surface Stipulation Applicable to All Surface-Disturbing Activities: We believe there is a typographical error, and this should be Appendix K, not Appendix L. Appendix L contains information related to the Vernal Resource Area grazing allotments.	The error has been corrected in the Proposed RMP/Final EIS.
WSA Supplement	Duchesne County Commission	G-10	2	Page 2-7, Table 2.3, Lands and Realty, bottom sentence: "An easement for the old Uintah Railroad bed from the Utah/Colorado line to Watson in Evacuation Creek would no be pursued.	The typographical error has been corrected in the Proposed RMP/Final EIS.
WSA Supplement	Duchesne County Commission	G-10	3	Page 2-10, Table 2.3, Recreation: Seep Ridge, Book Cliff Divide, and Atchee Ridge Roads would not be designed as Back Country Byways.	The typographical error has been corrected in the Proposed RMP/Final EIS.
WSA Supplement	Duchesne County Commission	G-10	5	Page 4-10, Section 4.3.2.3.6, 2nd sentence: "Alternatives A, C, and E are likely to have the greatest beneficial impacts, because all three involve....".	The language has been changed in the Proposed RMP/Final EIS.

**Table 5.13m. Comments Requiring a Change in the Document: Other**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
WSA Supplement	Duchesne County Commission	G-10	24	Page 4-74, Section 4.13.2.6.5 (Alternative E should be singular). In the last sentence of this section, "These alternatives should be changed to "this alternative".	The language has been changed in the Proposed RMP/Final EIS.
WSA Supplement	Duchesne County Commission	G-10	37	Page 4-122, Section 4.18.2.3.3: The acronym "HA" (which means Herd Area), is not listed in the list of acronyms included in the RMP.	The acronym has been included in the list of acronyms in the Proposed RMP/Final EIS.
WSA Supplement	Duchesne County Commission	G-10	56	Page 4-203, Section 4.21.2.10.6, 1st sentence: "Alternative" should be plural.	The typographical error has been corrected in the Proposed RMP/Final EIS.
WSA Supplement	Duchesne County Commission	G-10	57	Page 4-208, Section 4.21.2.11.6: "150,001 acre" should be plural.	The typographical error has been corrected in the Proposed RMP/Final EIS.
WSA Supplement	Duchesne County Commission	G-10	58	Page 4-213, Section 4.21.2.14.2: 1st line: ...would be managed by the following prescriptions: 12th bullet: Construction of wildlife watering facilities.	The language has been changed in the Proposed RMP/Final EIS.

**Table 5.13n. Comments Requiring a Change in the Document: Paleontology**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Duchesne County	G-9	PA2	This section recognizes the benefits of paleontological studies associated with mineral development mitigation; however, such benefits are not mentioned in the analysis of Alternatives A and D that follow.	Language acknowledging the scientific benefit (e.g., increasing the body of knowledge) of paleontological investigations conducted in association with minerals development has been added to the discussions of Alternatives A, D, and E.
Draft RMP/EIS	UBAOG	G-22	PA2	This section recognizes the benefits of paleontological studies associated with mineral development mitigation; however, such benefits are not mentioned in the analysis of Alternatives A and D that follow.	Language acknowledging the scientific benefit (e.g., increasing the body of knowledge) of paleontological investigations conducted in association with minerals development has been added to the discussions of Alternatives A, D, and E.

**Table 5.13o. Comments Requiring a Change in the Document: Process and Procedure**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	PR19	The State of Utah requests that the policies and plans indicated by Utah Code Section 63-38d-401, et. esq., be shown in the listing of other plans to which the RMP has a relationship.	The addition has been made as suggested.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	PR31 (JPR-7)	The document should include the FWS Ouray National Wildlife Refuge as one of the entities with which the BLM will coordinate management in the VPA.	The document will be amended to include the USF&WS.
Draft	Uintah,	G-25	PR9	The Wild and Scenic Rivers Act and BLM	The information from Appendix C Table 3

**Table 5.13o. Comments Requiring a Change in the Document: Process and Procedure**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS	Daggett, and Duchesne Counties			<p>Manual Section 8351 require consideration of characteristics which "do" or "do not" make a river segment a worthy addition to the NWSRS. Unfortunately, Table 5 only contains a discussion of the "do" characteristics (the ORVs) under the "Consideration" heading. Table 5 fails to acknowledge related information found in Table 3 of Appendix C, which represents some of the "do not" characteristics. For example, information from Table 3 regarding Argyle Creek states "[t]he high percentage of private land adjacent to the stream has resulted in the construction of numerous ranch houses and summer homes in the corridor. A power line parallels the stream for approximately 7 miles." This information not only caused Argyle Creek to receive a proposed "recreational" classification, but should also be considered relevant to a suitability determination.</p>	<p>relative to the characteristics that do not contribute to or detract a river segment's suitability for WSR designation has been added to Appendix C Table 5. Please note that the information from Table 3 is added in other appropriate sections such as Land Ownership within Table 5.</p>

**Table 5.13p. Comments Requiring a Change in the Document: Recreation**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Duchesne County	G-9	RE41 (RE-U)	Paragraph 2 line 7: The reference to "unmanaged OHV use" under Alt B is not logical given the data in Table 2.3 and elsewhere indicating that the amount of land open to unrestricted OHV use in Alt B is very similar to Alt A and C (yet "unmanaged OHV use" is not mentioned in the analysis under those alternatives).	The PRMP/FEIS has been revised to remove "unmanaged" from the text in Section 4.10.2.6.2.2.
Draft RMP/EIS	UBAOG	G-22	RE11	We need to further expand this to include special use permits for commercial operations on BLM ground.	Table 2.1.3 (Recreation Resources) in the PRMP/FEIS has been updated to include SRP information.
Draft RMP/EIS	Ranges West	O-43	RE45 (ARE-3)	Why is recreation given special socioeconomic condition here and other cultural activity such as grazing and mineral or energy discussions on pages 3-35 thru 3-46 do not even recognize socioeconomic characteristics or importance. This discussion of recreation socioeconomics does not belong in chapter 3.10 but should be part of Chapter 3.12. Treat all resource uses similarly.	The PRMP/FEIS text has been amended to combine the socioeconomic considerations in Section 3.10.4 with the tourism and recreation socioeconomic description in Section 3.12.2.2.4.

Table 5.13q. Comments Requiring a Change in the Document: Riparian

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	USFS—Ashley National Forest	G-19	RW32 (LRW-3)	Paragraph 1 change to read "would be a result of surface-disturbing activities both within and outside of the riparian zones."	Section 4.11 of the PRMP/FEIS has been revised to include surface-disturbing activities within and outside of riparian zones.
Draft RMP/EIS	USFS—Ashley National Forest	G-19	RW37 (LRW-8)	Address the effects of authorized and unauthorized OHV use and dispersed camping to riparian areas.	Section 4.11.2.7.1 in the PRMP/F has been revised to include an analysis of OHV use on riparian resources. Additional analysis of OHV use has also been included in Section 4.11.2.7.1.
Draft RMP/EIS	UBAOG	G-22	RW10	The DEIS needs to disclose the fact that it has no current assessment of the Book Cliffs riparian zones. Twenty-year-old data are not meaningful or reliable. Riparian areas will recover (and change) relatively quickly. There have been major changes in the area and the DEIS cannot assume that area remains in "poor ecological condition." In the Book Cliffs area, the Rocky Mountain Elk Foundation purchased ranches and grazing permits in the early 1990's and the area has only been lightly grazed by livestock on those permits. If the riparian zones have not improved, then BLM needs to disclose the fact that this has not occurred due to domestic livestock grazing.	As stated in Section 3.11.2, a preliminary wetland inventory has been conducted of riparian and wetland resources within the VPA (as of 2003). A comprehensive assessment of riparian conditions has yet to be conducted by a full interdisciplinary team. Once the inventory is completed, the condition of wetlands and riparian resources could change. Section 3.1.2 of the PRMP/FEIS has been revised to include a statement that states that:  "...current riparian conditions within the Book Cliffs are being assessed, and that conditions could have changed since the 1984 riparian/wetland assessment."
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	RW52 (R-RW1)	Modify the following statement as indicated by bolded additions and strikethrough deletions:  "Management actions to meet riparian objectives would include alternative sources of water, fencing, herding, change of livestock class, temporary closures, and/or changes of	The management actions listed in Table 2.1.16 (Riparian Resources) of the PRMP/FIES to meet riparian objectives are a range that includes herding of livestock as a management action that would be applied where appropriate. Nowhere in this section is it implied or stated that the livestock grazing industry is specifically

Table 5.13q. Comments Requiring a Change in the Document: Riparian

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			<p>season. Additional management actions would include reductions in big game and/or wild horse numbers."</p> <p>Herding is very expensive and not reasonable alternative without proper infrastructure (fencing and water). Herding is not a substitute for structural range improvements. An essential component of riparian management is to provide alternative sources of water to facilitate distribution of livestock and big game / wild horses. The prescription omits significant factors of big game and wild horses and unfairly targets the livestock industry. It also implies that BLM will not support nor fund the range improvements necessary to properly manage the rangeland resources.</p>	<p>targeted for application of riparian and wetland resources management actions. The commenter does not provide additional information on what "significant factors" have been omitted from livestock grazing prescriptions.</p> <p>Table 2.1.16 under the subsection entitled Management Common to All Action Alternatives has been revised to read as follows:</p> <p>"Appropriate management actions to meet riparian objectives could include fencing, herding, change of livestock class, temporary closures, and/or change of season."</p>
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	<p>RW53 (R-RW2)</p> <p>RE: Alternative A (Pages 2-53 and 2-54)—Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Key streamside herbaceous riparian vegetation, where stream bank stability is dependant dependent upon it, would have a minimum stubble height at the end of the growing season capable of trapping and assuring retention of sediment during high flows. Management actions could be based on residual stubble height of key herbaceous species measured from the green line or utilization of current year's growth at the end of the growing season. An initial management</p>	<p>Table 2.1.6 (Riparian Resources) of the PRMP/FEIS has been revised to correct the spelling error in Table 2.3 (Riparian Alternative A).</p> <p>The BLM declines to make the other suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how</p>

**Table 5.13q. Comments Requiring a Change in the Document: Riparian**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			<p>action would be to set a stubble height of 4 inches or 30% utilization on key herbaceous species measured from the green line if riparian conditions in that reach are to be maintained and 6 inches stubble height on key herbaceous species measured from the green line or &lt;20% utilization if riparian conditions need to be improved. This initial stubble height or utilization level would need to be jointly monitored by the permittee and BLM to verify if it provides for maintenance or improvement objectives, with adjustments in allowable utilization or stubble height being made as needed."</p> <p>Make the same changes for Alternative A, same pages.</p> <p>Make the same changes on Page 2-86 under Alternative A.</p> <p>Make the following changes on Page 2-86 for Alternative D:</p> <p>"Upland utilization and riparian vegetation utilization measurements are specified in allotment management and grazing plans, rather than in the RMP unspecified, and proper use would potentially be maintained."</p> <p>The alternatives incorrectly use the stubble height and utilization standards</p>	<p>the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>

Table 5.13q. Comments Requiring a Change in the Document: Riparian

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				interchangeably. They are not interchangeable and as written, they are not defined properly. The RMP should adopt the stubble height standard as revised. This comment applies throughout the document, which refers to riparian grazing use standards in terms of (4" stubble on key herbaceous species or 6" stubble height or 30% to 20% utilization presumably on woody species. See e.g. 2-53, page 2-86 and 2-93. The riparian standards stated on page 4-238, 4.15.2.2.1 Alternative A (also see line 2 page 4-239) are equally problematic. The differences in wording regarding key species vs. woody species are significant and could lead to very troublesome interpretations by staff. Monitoring needs to be jointly done by BLM and the permittee. The RMP discussion is inaccurate.	
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	RW59 (R-RW8)	<p>Modify the following statement as indicated by bolded:</p> <p>"Approximately 16,000 acres of riparian zones are found along the Green and White Rivers and Bitter, Evacuation, Sweetwater, and Willow Creeks in the Book Cliffs portion of the VPA. As of 1982, 470 acres of riparian zones in the Book Cliffs portion of the VPA were identified as being in poor ecological condition (BLM 1984). These data are not current and are probably not an accurate indicator of current conditions. BLM will continue to complete the range health assessments for each allotment. The Diamond</p>	<p>Section 3.11.1 of the PRMP/FEIS has been revised to include clarification of out-dated riparian data for the Book Cliffs and an acknowledgment that preliminary inventories have been conducted, to be followed by comprehensive VPA wetland and riparian inventories (Section 3.11.2). The reads as follows:</p> <p>"Approximately 16,000 acres of riparian zones are found along the Green and White Rivers and Bitter, Evacuation, Sweetwater, and Willow Creeks in the Book Cliffs portion of the VPA. As of 1982, 470 acres of riparian zones in the Book</p>

**Table 5.13q. Comments Requiring a Change in the Document: Riparian**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			<p>Mountain portion of the VPA contains 60,300 acres of riparian lands (2 percent of the inventoried lands), with 15,650 acres of the 60,300 acres in public lands. There are 540 miles of perennial and intermittent streams in the VPA (BLM 1993b). The BLM manages its riparian zones for multiple uses, including recreation, grazing, wildlife habitat, and other uses."</p> <p>The DEIS needs to disclose the fact that it has no current assessment of the Book Cliffs riparian zones. Twenty-three year old data are not meaningful nor reliable. Riparian areas will recover (and change) relatively quickly. The DEIS cannot assume that area remains in "poor ecological condition." Nor is it accurate for the RMP to imply that the poor ecological conditions are due to domestic livestock grazing or that they still exist. For instance, in the Book Cliffs area, the Rocky Mountain Elk Foundation purchased ranches and grazing permits in the early 1990's and the area has not been grazed by livestock since that purchase. If the riparian zones have not improved, then BLM needs to disclose the fact that these resource conditions are not due to continued domestic livestock grazing and BLM must pursue wildlife (elk) reductions and vegetation projects. BLM and permittees have been actively monitoring rangeland health conditions over the last several years. A significant percent are in functioning condition. In the areas that are at</p>	<p>Cliffs portion of the VPA were identified as being in poor ecological condition (BLM 1984). However, current riparian conditions within the Book Cliffs are being assessed, and riparian conditions could have changed since the 1984 riparian/wetland assessment (see 3.11.2 below). The Diamond Mountain portion of the VPA contains 60,300 acres of riparian lands (2 percent of the inventoried lands), with 15,650 acres of the 60,300 acres in public lands. There are 540 miles of perennial and intermittent streams in the VPA (BLM 1993b). The BLM manages its riparian zones for multiple uses, including recreation, grazing, wildlife habitat, and other uses."</p>

Table 5.13q. Comments Requiring a Change in the Document: Riparian

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				risk or not functioning, we find that there is major wildlife use, especially on willows. In other cases, road crossings may funnel runoff to create an arroyo effect that prevents the establishment of vegetation.	
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	RW61 (R-RW10)	Not all upland surface disturbance will accelerate erosion. Utah non-point source best management practices and BLM BMPs also limit surface erosion. Any sedimentation will depend on the site, soils, slope and proximity to a water body. The general statement as written is inaccurate.	Section 4.11 of the PRMP/FEIS has been revised for clarification to state that "Upland surface disturbance could cause a loss of vegetation that could accelerate soil erosion..."
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	RW72 (R-RW21)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"Proper functioning condition (PFC) is the minimum acceptable goal for riparian areas. Riparian-wetland areas would be maintained, restored, and managed protected, and/or expanded to achieve PFC with respect to soils, vegetation, and hydrology/water quality. Thus, riparian management would have short-and long-term, direct, beneficial impacts to soils and water through proper and well-timed grazing. where use of streamside vegetation is reduced."</p> <p>The RMP should focus on well-timed grazing rather than reducing livestock grazing.</p>	<p>Section 4.13.1.7 of the PRMP/FEIS has been revised to read as follows:</p> <p>"Proper functioning condition (PFC) is the minimum acceptable goal for riparian areas. Riparian-wetland areas would be maintained, restored, and managed to achieve PFC with respect to soils, vegetation, and hydrology/water quality. Thus, riparian management would have short- and long-term, direct, beneficial impacts to soils and water where use of streamside vegetation is reduced."</p>

**Table 5.13q. Comments Requiring a Change in the Document: Riparian**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
WSA Supplement	Comcast	O-148	5	The riparian goal of PFC is totally inadequate because PFC is only a minimal hydraulic evaluation, is highly subject and biased. PFC does not address habitat or water quality. Regarding stubble height standards, they are ineffective because they are typically not enforced, do not represent use in riparian areas and little strips of sedges do not filter sediment. For filtering sediment, intact riparian areas with vegetated stream banks and fully vegetated riparian areas are needed to reduce erosion and filter sediment. These deficiencies should be addressed by closing all riparian areas to livestock.	See Table 2.1 pages 2-19 and 2-31. The text on 2-19 has been revised in Grazing in River Corridors, 4th sentence – the word "temporarily" has been removed to reflect that after all options have been exhausted those riparian areas would be closed to grazing. Comment noted

**Table 5.13r. Comments Requiring a Change in the Document: Scope**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
WSA Supplement	US EPA	G-6	36	Table 2.5, Summary of Impacts for Environmental Justice, Page 2-83: This section should also address impacts to individual tribal members. The adverse impacts to human health referenced in Alternative D need to be discussed in Alternatives A, B, and C.	This table in the Proposed RMP/Final EIS, Table 2.2, has been modified to incorporate the potential environmental risks to this community.  Wellfield development would not be in the immediate area of a Tribal community. A nearby community, however, is located approximately 10 miles to the north at the settlement of Ouray.

**Table 5.13r. Comments Requiring a Change in the Document: Scope**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					Potential downsides to the residents of Ouray are the risks associated with nearby minerals development. These risks include increased truck traffic through the town, and wellfield effects such as flaring, dust, spills, well blowouts and impacts to water resources.

**Table 5.13s. Comments Requiring a Change in the Document: Special Designation**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	SD157	The information under Section 3.14.3.2, page 3-84, should more fully and accurately represent the specific management requirements found in Manual Section 8351.32C, particularly regarding valid existing rights.	Chapter 3 in the PRMP/FEIS has been revised to expand the discussion of management requirements for rivers determined eligible for the NWSRS to include the more detailed information outlined in Manual 8351, Section .32C.
Draft RMP/EIS	State of Utah	G-1	SD167	The White River SRMA (western part) would be managed as no surface occupancy. How is this different from the ACEC proposed for the area? The State of Utah has concerns that the establishment of an SRMA outside of the 1/2-mile wide river corridor is inappropriate due to the demonstrated lack of recreational activity beyond the corridor. Why is it necessary outside the river corridor? Is it even necessary to have an SRMA in the area in light of the proposed WSR designation on the west segment of the	A review of Table 2.3, Recreation-shows those NSO stipulations are not proposed in direct correlation to the SRMA. Rather, Table 2.1 and Chapter 4 of the PRMP/FEIS has been revised to correct and clarify the apparent contradiction. (Special Designations – Areas of Critical Environmental Concern (ACECs)) of the PRMP/FEIS clearly indicates that management of the ACEC would include NSO for the western portion of the area.

Table 5.13s. Comments Requiring a Change in the Document: Special Designation

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				White River SRMA? How are the proposed WSR and SRMA designations related to each other?	<p>The SRMA and WSR designations are two separate types of management tools. SRMAs are not special designations but tools for integrated management of recreational opportunities in areas of high recreation use. WSR designations are special designations intended to recognize particular river related values, which may include recreation, that require special management consideration and action.</p> <p>WSR management would only apply to one-quarter mile from center-line on each side of the river. Recreation use occurs outside of this narrow corridor and has therefore the BLM has proposed an SRMA in two alternatives.</p> <p>Also, see comment response SD8-G-9.</p>
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-24	SD383 (SO32a)	There is no analysis of the impacts on RFD or socioeconomic impacts from the proposed Nine Mile Canyon SRMA.	<p>There is no requirement in NEPA to do the detailed analysis that the commenter demands. This is outside the scope of the RMP and EIS. Section 4.12 of the PRMP/FEIS states:</p> <p>"If impacts to some aspect of the socioeconomic situation are not mentioned in this analysis, then a negligible effect should be assumed."</p>
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	SD366A (R-SD30)	This statement suffers from an all inclusive and thus inaccurate generalization. It also confuses the difference between vegetation treatments and water projects. It is assumed that the	The commenter is correct that the acres referred to are specific to vegetation treatments geared at range improvement under Alternative A. The same assumption was made in the

**Table 5.13s. Comments Requiring a Change in the Document: Special Designation**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				acreage figure refers to acres to be treated and not acres affected potentially by water projects. The RMP also omits water projects and fences, which are essential to distribution and management of grazing.	<p>description of the other alternatives in this same line of Table 2.5. The statements within the table for all alternatives have been reworded to include numbers for potential water projects. Also, clarification has been made to the Vegetation section of Table 2.5 in the Draft EIS that the acres referred to are related strictly to vegetation treatments geared toward range/forage improvement.</p> <p>Note: Table 2.5 of the Draft RMP has been renumbered as Table 2.2 of the PRMP/FEIS.</p>

**Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	SO25	The State of Utah is concerned about the inadequacy of baseline data used in the socioeconomic analysis. The BLM Planning Handbook (Appendix D) provides specific areas to be considered when incorporating social science into the planning process. Social science information should include economic, political, cultural and social structure of not only the counties within the VFO, but also the region and the Nation as a whole. The DEIS fails to do this.	This information has been included in the Section 3.12 in the PRMP/FEIS.

**Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	SO26	The RMP makes broad statements about the socioeconomic profile of the planning area, broken down into discussions about each of the three counties, however, the draft seems to lack a detailed analysis of the situation on the ground. For instance, in the Socioeconomic section of Chapter 3, the draft includes only two conclusions regarding the region's history, geography, and economics; first, the majority of the planning area sustain a rural/small town lifestyle, second, the counties are economically dependent on the development of the physical resources within the VFO. According to the BLM Planning Handbook, social values, beliefs, and attitudes; how people interact with the landscape; and sense-of-place issues should also be included. The VFO should elaborate on the socioeconomic baseline for the planning area and review it for inaccuracies.	Section 3.12 in the PRMP/FEIS has been revised to include the information made in the comment.
Draft RMP/EIS	State of Utah	G-1	SO27	The DRMP fails to thoroughly analyze the social and economic impacts of the alternatives. The draft only analyzes the socioeconomic impacts of Lands and Realty, Forage, Minerals, and Recreation and OHV decisions. Additional resource management decisions, however, have the potential to have an impact on state and county economies, specifically special designations. Notably missing is an economic analysis of the lost shared mineral revenue from federal lands that have an economic impact on the community as well as other mineral sharing	The PRMP/FEIS has been revised to include further analysis of effects on socioeconomics from proposed management actions of other resources, including special designations.  Please see response to SO3 regarding state trust lands.

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				programs within the state. The development of mineral resources on federal lands and state trust lands would be negatively impacted by overly restrictive management prescriptions imposed by special designations. In its economic impact analysis, the RMP has excluded the significant state and local revenues generated through a variety of taxes paid that would be impacted by special designations.	
Draft RMP/EIS	State of Utah	G-1	SO28	During the scoping process, Uintah County provided the BLM with two studies related to the economic significance of mineral development, specifically oil and gas, in the Uintah Basin. These studies were Economic Impact Analysis of the Drilling and Completion of a Natural Gas Well in the Uintah Basin by the Utah Energy Group and The Uintah Basin Industry Impact Study by Pam Perlich of the University of Utah. The RMP fails to reflect the information contained in these documents. The State of Utah requests that the BLM review these studies and incorporate their findings into the RMP.	The PRMP/FEIS has been revised to include the recent State-commissioned study on the impact of the oil and gas industry on the Uintah Basin.
Draft RMP/EIS	State of Utah	G-1	SO29	Daggett, Duchesne, and Uintah Counties have estimated that up to 80% of the local economy is dependent directly or indirectly on access to, and utilization and extraction of natural resources on the public lands. The BLM is required by its own Planning Handbook, Section H-1601-H, and IM 2002-167 to assess the degree of local dependence on public land	BLM feels that the intent of IM 2002-167 and the Planning Handbook have been implemented. See comment response SO2 regarding these same data sources.  The PRMP/FEIS has been revised to reference to the USU social survey on attitudes of residents on public land management.

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				resources, and use this information as part of the decision-making process. The state is concerned that these requirements have not been met within the draft RMP and EIS. This issue should be examined in more detail.	
Draft RMP/EIS	State of Utah	G-1	SO30	Sections of the socioeconomic impacts analysis are overly generalized to the point that social and economic impacts specific to the planning area are not apparent. For example, in the "Lands and Realty" portion of the "Impacts Common to All" section, long term beneficial effects on the social goals of communities are described by accommodating community growth and development when it is determined that accommodating social goals is in compliance with other goals and objectives of the Proposed RMP. The portion of the plan does not reference specific areas of the DRMP/DEIS where this occurs or direct the reader to any specific management decisions that provide for community growth. The section is vague and unspecific and should reflect specific management prescriptions in the plan rather than general statements.	Section 4.12.2.2 has been rewritten in the FEIS, and the BLM believes that this revision addresses the commenter's concerns.
Draft RMP/EIS	Duchesne County Chamber of Commerce, Economic Development Office	G-5	SO1	The unemployment rate for Duchesne County should be closer to 7.1% rather than the 1.7% stated in the RMP.	Section 3.12.2.1 in the PRMP/FEIS has been revised to correct this number.

**Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Utah State Office of Education	G-6	SO3	The RMP has no analysis of the economic impacts of the decisions on Utah trust lands or on the economic impact on schools, the University of Utah, and Utah State University.	Section 4.12 in the PRMP/FEIS has been revised to include an analysis of the effects on SITLA lands. An analysis of the effects of Alternative E on SITLA lands has been added to Section 4.12.3.1.5.
Draft RMP/EIS	Uintah County	G-15	SO63 (JSO-15)	We provided you with specific data source; there is no reference or indication that it was ever used. (Uinta Basin Industry Impact Study)	This document has been reviewed, and the relevant information has been incorporated into the Final RMP/EIS.
Draft RMP/EIS	Uintah County	G-15	SO64 (JSO-16)	We provided you with specific data source; there is no reference or indication that it was ever used. (UEO Report addressing cost and related impacts of Drilling a well in Uintah and Duchesne counties.) The Draft RMP drilling costs differ by more than 300% from this report, making it impossible to accurately analyze and disclose impacts.	This document has been reviewed, and the relevant information has been incorporated into the Final RMP/EIS. The BLM accepts the identified document as a valid source of information, and the socioeconomic analysis was redone based upon the information provided.
Draft RMP/EIS	Uintah County	G-15	SO68 (JSO-21)	Summary of Impacts, Discipline, Social and Economic Consideration: Mineral Development is erroneous. There is no reference as to where and how these numbers were calculated. Based on upon UEO report, these numbers need to be recalculated. It does not make sense to have \$3.8 billion in cost to recoup \$437 million in sales.	This document has been reviewed, and the relevant information has been revised into the Final PRMP/FEIS. The BLM accepts the identified document as a valid source of information, and the socioeconomic analysis was redone based upon the information provided.  See comment responses to SO31 and SO54.
Draft RMP/EIS	Uintah County	G-15	SO69 (JSO-22)	Recreation section. We question these numbers, are they for BLM managed land only? All 3 counties? Are oil field workers staying in local motels being counted as tourists? Again, there is not reference to check	It is unclear which statistic in the Recreation Section of Table 2.5 is being questioned.  Section 4.12.3.2 in the PRMP/FEIS has been revised to reflect the impact of oil workers in

**Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				where these stats came from.	local motels.
Draft RMP/EIS	Uintah County	G-15	SO71 (JSO-24)	Note that a large portion of "tourism tax dollars" come from the oil and gas industry (local motels for housing for oil field workers etc). This should be made clear in all sections of the RMP discussing tourism impacts.	Section 4.12.3.2 in the PRMP/FEIS has been revised to clarify the relationship between oil and gas workers and "tourism tax dollars."
Draft RMP/EIS	Uintah County	G-15	SO72 (JSO-25)	This data from 2000; table needs to be updated. Should use info from Utah Division of Travel not Utah Travel Council. Also this table reflects a percentage change, but does not say what it is changing from.	Table 3.10.1 in the PRMP/FEIS has been revised to incorporate information from the Utah Division of Travel Development.
Draft RMP/EIS	Uintah County	G-15	SO73 (JSO-26)	Update the population data. Although census from 2000, recognized agencies have more updated population data and this data should be used.	There may be more up to date population numbers, but the commenter did not provide that information to use. Population projections for 2020 are given and updated data has been used where applicable.  Also, an RMP will never have current, up-to-date information due to the length of time it takes to publish the document. The data is provided for comparison purposes.  See comment response SO53.
Draft RMP/EIS	Uintah County	G-15	SO75 (JSO-28)	Table needs to be updated with FY2004 data. Old data does not accurately show present impacts.	Due to changes in recordation at the Minerals Management Service, this information is not available for more recent years. However, Table 3.12.4 in the PRMP/FEIS has been revised to incorporate new minerals revenue figures.
Draft RMP/EIS	Uintah County	G-15	SO76 (JSO-	Charts from Utah Division of Oil, Gas and Mining are 2002; need to be updated with	The charts following Table 3.12.4 in the PRMP/FEIS have been revised to reflect 2004

**Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
			29)	2004.	figures from the Utah Division of Oil, Gas and Mining.
Draft RMP/EIS	Uintah County	G-15	SO77 (JSO-30)	Gas and oil prices per barrel in RMP need to be adjusted to reflect current conditions.	Section 3.12.2.2.3 in the PRMP/FEIS has been revised to reflect 2004 figures from the Utah Division of Oil, Gas and Mining
Draft RMP/EIS	Uintah County	G-15	SO78 (JSO-31)	Conflict between Tax Revenue text and Table 3.10.1 data. (\$951,000 vs. \$334,514). Use most current data.	Section 3.12.2.2.4 in the PRMP/FEIS has been revised to reflect the correct tax revenue figures. See response to SO6.
Draft RMP/EIS	Uintah County	G-15	SO79 (JSO-32)	Data doesn't truly reflect actual tourism dollars (high % of industry in them).	This has been noted in Sections 3.12.2.2.4 and 4.12.3.2
Draft RMP/EIS	Uintah County	G-15	SO80 (JSO-33)	ALL county revenue should be included in data. Show what portion of revenue goes to state and not county.	Sections 3.12.2.2.3 and 4.12.3.2.1 in the PRMP/FEIS have been revised to indicate what portion of county revenue goes the state.
Draft RMP/EIS	Uintah County	G-15	SO85 (SO-38)	Last paragraph 2nd sentence should read "to the federal government and the State of Utah" rather than "or"	Section 4.8.1.1 in the PRMP/FEIS has been revised to incorporate the change suggested in the comment.
Draft RMP/EIS	Uintah County	G-15	SO86 (JSO-39)	Inconsistency in number of wells between various sections of RMP and Mineral Potential Report. Figure of 6,530 more accurately reflects a minimum for wells, not a maximum.	Errors in the numbers of wells between various sections will be corrected in the FEIS. The maximum number of wells predicted in the RFD was based on the best information available at the time of the report.  See comment response AT29.
Draft RMP/EIS	Uintah County	G-15	SO90 (JSO-43)	Cost of drilling as stated in RMP is incorrect and results in need for reassessment of all alternatives.	Section 4.12.3.2 in the PRMP/FEIS has been revised to consider the cost of drilling based upon data received by the BLM.
Draft	Uintah	G-15	SO92	Discrepancy in well numbers (6,312 v. 6,340) in document text vs table. Also well number	Section 4.12.3.2.1 in the PRMP/FEIS has been revised so that the number of wells are

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS	County		(JSO-45)	from MPR of 6,530 not reflected in any alternative.	consistent throughout the RMP. The well number of 6,530 is the maximum RFD. The maximum number of wells was adjusted by the percent of area open for development under each alternative.
Draft RMP/EIS	Uintah County	G-15	SO94 (JSO-47)	Royalties and PILT not connected in any way and the statement that they are suggests that the preparer has no knowledge of BLM and local, or state revenue sources.	Sections 4.12.3.2.2 thru 4.12.3.2.4 in the PRMP/FEIS have been revised to clarify the impacts of royalties and Payments in Lieu of Taxes (PILT).
Draft RMP/EIS	Uintah County	G-15	SO98 (JSO-51)	Section is inadequate and insufficiently detailed to specific locations and counties and does not tie wages to jobs. Also, references are not cited.	The document has been revised such that references used have been cited the text.
Draft RMP/EIS	UBAOG	G-22	SO16	This same level of analysis should be applied to oil and gas development as it has a positive effect on the same sectors of the economy. The loss of jobs and tax revenue will be made up several times over by development.	Sections 4.12.2.3 and 4.12.2.4 in the PRMP/FEIS have been revised to address tourism tax revenues.
Draft RMP/EIS	UBAOG	G-22	SO17	The impact to Daggett County discussion should be struck as the increase in wells is only 4.5. This impact is a great exaggeration as are others where mineral development is discussed.	Section 4.12.2.2 in the PRMP/FEIS has been revised to incorporate the suggested comment. These sentences have been deleted in the FEIS.
Draft RMP/EIS	UBAOG	G-22	SO18	This sentence should be changed to read "Under Alternative A 1,798,378 acres would be open in leasing categories 1 and 2 to oil and gas and coal bed methane. CBNG should be added here as acres are not correct if you don't. It should be noted that categories 1 and 2 are used here with no indication of where	1,776,782 acres would be open to Category 1 and 2 oil and gas (which includes coal bed natural gas) leasing categories under Alternative A. Section 4.12.3.2.1 in the PRMP/FEIS has been revised to show the correct acreages for mineral development.

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				they are in the text or on the maps. This comment applies to Alternative "C" and "D" in this section. Nowhere does this section discuss volumes of production.	CBNG production would account for approximately 2% of the natural gas in the VPA, therefore a detailed analysis (in comparison to oil and natural gas development) of CBNG development will not be provided in the PRMP/FEIS. See Section 4.12.3.1
Draft RMP/EIS	UBAOG	G-22	SO19	The Counties question the findings in the last two sentences of Section 4.12.3.1 on page 4-175. If Alternative C were to be selected, Table 2.3 indicates that livestock forage would decrease from 146,161 AUMs under Alternative D to 77,294 AUMs. Such a reduction would have an impact on the livestock industry and its ability to expand in the future to serve a growing population. Such reductions ignore provisions of the Taylor Grazing Act and withdrawals.	Sections 4.12.2.1 and 4.12.3.1 in the PRMP/FEIS have been revised to provide details on AUM demand.
Draft RMP/EIS	Thomas M. Power	I-33	SO108	The DEIS projects that oil and gas development under the preferred alternative would result in 215,000 new jobs being created. Given that the total employment in the planning area is about 23,000, this would represent almost a ten-fold increase in employment over the next 20 years. That would be an oil and gas boom of monumental proportions.	Based on the data available to the BLM, the socioeconomic section has been rewritten in the FEIS. See Section 4.12.3.1 for explanation of employment numbers. See also comment responses SO31 and SO54.
Draft RMP/EIS	Thomas M. Power	I-33	SO109	Analysis of how mineral extraction employment has actually changed with oil and gas drilling in the Uinta Basin indicates that about one annual job is associated with a new well being drilled and about one operation and	Based on the data available to the BLM, the socioeconomic section has been rewritten in the FEIS. See responses to comments SO31 and SO54.

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				<p>maintenance job is associated with every 6 wells brought into production. The DEIS, in contrast, estimates that there are 30 jobs associated with each well drilled and 24 jobs associated with every 6 wells brought into production. The job impact estimates based on the actual experience in the Uinta Basin used in the report (Power 2005: The Economic Impact of Expanded Oil and Gas Development in Utah's Uinta Basin) used to prepare my comments are confirmed by studies elsewhere in Utah and the Mountain West. There is no evidence to support the DEIS oil and gas job multipliers.</p>	
Draft RMP/EIS	Thomas M. Power	I-33	SO112	<p>Although school districts in the Uinta Basin collect considerable property tax revenues from oil and gas developments, the Utah state school equalization program largely offsets those oil and gas tax revenues by reducing the payments the state government makes to those school districts. The intent of the Utah school equalization program is to assure that approximately the same resources are available to support the education of a student regardless of how rich or poor the school district's tax base is. Statistical analysis of that program confirms that it is largely successful in offsetting the "windfall" that certain school districts otherwise would receive from the oil and gas developments within their taxing jurisdictions. For that reason, expanded oil and gas development in the Uinta Basin will not dramatically improve the financial</p>	<p>Contributions to local and state governments have been revised in the FEIS. As a result of the equalization program, BLM did not specifically analyze resource management impacts to local school districts.</p>

**Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				condition of local schools.	
Draft RMP/EIS	Thomas M. Power	I-33	SO31	I submit the report entitled The Economic Impact of Expanded Oil and Gas Development in Utah's Uinta Basin as my comment on the draft RMP/EIS.	The most recent State-sponsored study on the impact of oil and gas development in the Uintah Basin has been incorporated.
Draft RMP/EIS	Bill Robinson	I-173	SO41 (SO-L)	The DRMP/DEIS fails to conduct a proper economic analysis. The DRMP/DEIS in this case failed to properly include and assess the environmental impacts on the local economies that would be affected in particular with regard to the effect that reduced livestock grazing will have on the local economy. The alternatives of the DRMP/DEIS, besides the no action alternative, all consider reducing the number of AUMs for livestock, or calls for the reduction of only livestock use of the range. The BLM must consider the economic and historic contribution of ranching and livestock grazing to the local economy and balance that against the harm that will be caused to the economy if that grazing is reduced.	Section 4.12.3.1 in the PRMP/FEIS has been revised to assess the environmental impacts of the local economies. The Proposed RMP has no reduction in AUM's and is identical to the current situation (the No Action alternative).
Draft RMP/EIS	Bill Robinson	I-173	SO42 (SO-M)	The DRMP/DEIS acknowledges the historic and economic contributions grazing and ranching has on local communities. The DRMP/ DEIS however, is devoid of discussion or analysis of the impacts that reduced or eliminated or retired grazing preferences would have on local economies or on small businesses.	Section 4.12.3.1 in the PRMP/FEIS has been revised to assess the historic and economic impacts of grazing and ranching on local communities.
Draft RMP/EIS	Utah Farm Bureau	O-9	SO19	The Counties question the findings in the last two sentences of Section 4.12.3.1 on page 4-175. If Alternative C were to be selected,	Sections 4.12.2.1 and 4.12.3.1 in the PRMP/FEIS have been revised to provide

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
	Federation			Table 2.3 indicates that livestock forage would decrease from 146,161 AUMs under Alternative D to 77,294 AUMs. Such a reduction would have an impact on the livestock industry and its ability to expand in the future to serve a growing population. Such reductions ignore provisions of the Taylor Grazing Act and withdrawals.	details on AUM demand.
Draft RMP/EIS	Questar	O-12	SO99 (LSO-1)	Local and state revenue through oil and gas taxes is not discussed.	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten and discusses the fiscal impacts to local government of the alternative decisions affecting the oil and gas industry in the Vernal planning area.
Draft RMP/EIS	IPAMS	O-14	SO16	This same level of analysis should be applied to oil and gas development as it has a positive effect on the same sectors of the economy. The loss of jobs and tax revenue will be made up several times over by development.	Sections 4.12.2.3 and 4.12.2.4 in the PRMP/FEIS have been revised to address tourism tax revenues.
Draft RMP/EIS	IPAMS	O-14	SO99 (LSO-1)	Local and state revenue through oil and gas taxes is not discussed.	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten and discusses the fiscal impacts to local government of the alternative decisions affecting the oil and gas industry in the Vernal planning area.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SO45 (SO-P) (JSO-3)	Tables 3.12.3 and 3.12.7 in Chapter 3 should indicate that the "Mining" category includes oil and gas employment.	Tables 3.12.3 and 3.12.7 in the PRMP/FEIS have been revised to indicate that the "mining" category includes oil and gas employment.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SO47 (SO-R) (JSO-4)	The draft RMP/EIS fails to effectively address the full realm of positive economic benefits associated with current and future oil and gas activities. While Section 4.12 provides a brief	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten. The BLM believes this revision represents the importance of this industry to the Vernal planning area.

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				comparison of wells to be drilled, industry jobs that would be created, industry sales, and federal royalties under each alternative, what appears to have been excluded is the highly significant state and local revenue generated due to a variety of taxes paid.	
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SO48 (SO-S) (JSO-5)	The socioeconomic analysis contained in Section 4.12 of the draft Vernal RMP/EIS does not adequately describe the long-term incremental and cumulative differences in public sector revenues of the four alternatives. Specifically, the section fails to discuss the property tax revenues that each alternative would generate and the various community facilities and services that this significant source of revenue funds for residents in the Vernal planning area. As an example, according to the Uintah County Treasurer's office, fully 57.6% of that county's 2004 property tax revenue was derived from the oil and gas and mining industries. Accordingly, management decisions that influence the level of oil and gas activity have direct and significant impacts on local government fiscal conditions in the VPA and indirect impacts on the quality of life of Vernal planning area residents. These impacts must be disclosed in the draft RMP/EIS.	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten and discusses the fiscal impacts to local government of the alternative decisions affecting the oil and gas industry in the Vernal planning area.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SO49 (SO-T) (J-SO7)	The Draft RMP/EIS does not address Utah severance taxes. Severance taxes on natural gas are assessed on a sliding scale, 3% on the first \$1.50/Mcf, and 5% percent thereafter.	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten and discusses the fiscal impacts to local government (including severance taxes) of the alternative decisions

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				The draft RMP/EIS does not estimate the differences in severance taxes for each alternative. Given that oil and gas production from the Vernal planning area was a substantial portion of the state's total, it is important to understand the implications of each alternative for State of Utah severance tax revenues.	affecting the oil and gas industry in the Vernal planning area.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SO50 (SO-U) (J-SO8)	The absence of a more complete fiscal assessment will impede the ability of the public, local governments, and BLM decision-makers to assess the effects of each alternative on local government revenues and on their ability to provide public services, which directly affect the quality of life of Vernal planning area residents. Moreover, the limited scope fiscal analysis in the Draft RMP/EIS does not fulfill the BLM's charge to assess the degree of local dependence on resources from public lands, or fulfill the agency's obligations outlined in Land-use Planning Handbook (H-1601-H) or Instruction Memorandum No. 2002-167.	Section 4.12 in the PRMP/FEIS has been revised to expand the discussion of the fiscal impacts to state and local governments.  The BLM will review the Utah State University survey of rural counties conducted by the State of Utah. The BLM has received preliminary data from this study received after completion of the DEIS. The BLM has incorporated findings in the PRMP/FEIS as appropriate.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SO51 (SO-V) (J-SO9)	The Draft RMP/EIS assumes development costs of \$600,000 per well. This figure is dated and does not account for other types of development taking place in the Vernal planning area. The deeper formations being developed cost more than the figure used above and the analysis should reflect this fact. This number should be revised to ensure that any economic analysis accounts for the	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten. The PRMP/FEIS incorporates recent data provided by the US Bureau of Labor Statistics and the State of Utah Division of Oil, Gas and Mining. This data has been used in the recent (November, 2007) study commissioned by the State of Utah: The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				activities in the planning area. Regardless of this oversight, the impact analysis does not address the extent these expenditures would occur in the local economy, nor do they address how the economy would be impacted both locally and nationally. Indirect employment as a result of industry expenditures and the additional tax revenue this spending activity would generate are important impacts the Draft RMP/EIS should disclose. A study was prepared that estimated that eighty-one percent (81%) of the expenditures for development benefited the local economy. On that assumption, the numbers should be reworked to reflect this significant detail.	Phase I - The Uinta Basin.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SO52 (SO-W)	The statement in Section 4.12.2.2, paragraphs 3 and 4 that areas open to (minerals) exploration "would have an adverse impact on the recreation and tourism industries" and that "the quality of the recreational experience would be degraded along with possible decreases to visual quality..." is incorrect. In much of the Vernal planning area, mineral exploration and development activity would occur in remote areas that are not popular for recreation or visually sensitive. At present, mineral development and recreational activities generally take place in separate geographic areas and co-exist quite successfully in the Vernal planning area. As examples, no mineral development would occur within the recreationally significant	Section 4.12.2.2 in the PRMP/FEIS has been revised to delete the statements as suggested in the comment.  See also comment responses SO15 and SO37.

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				Flaming Gorge National Recreation Area, Dinosaur National Monument, nor along much of the Green River (due to NSO and CSU stipulations intended to protect recreational, scenic, and other natural resources values of the river corridor). In addition, despite the substantial increase in oil and gas exploration and development that has occurred in the Vernal planning area over the last 15 years, tourism has increased rather than decreased. This fact directly contradicts the baseless statement that mineral development hurts the tourist economy and employment in the Vernal planning area.	
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SO54 (SO-Y) (J-SO12)	<p>The draft RMP/EIS states that the rationale for decreasing mineral development is to increase recreation and OHV opportunities in the Vernal Planning Area. According to the information presented in Table 4.12.1, the economic value of oil and gas sales in the Vernal planning area is currently \$189.53 million and \$248.68 million, respectively. Royalties are currently more than \$8.6 million annually. According to the draft RMP/EIS recreation currently provides a total tax benefit at approximately \$1.6 million. The revenues from royalties, alone, are more than five times the tax benefits from recreation.</p> <p>Under Alternative D (existing conditions) the total number of jobs, based on the average number of employees per well, is estimated to</p>	<p>The jobs created per well has been revised in the FEIS. Based on data from the US Bureau of Labor Statistics, and the State of Utah Division of Oil, Gas and Mining, it is more reasonable to project an increase approximating 3.74 new jobs per well drilled than the approximately 14 suggested in the UEO study, which was for only one well. The impact analysis in Chapter 4 will be rewritten to reflect this lower estimate. The FEIS will continue to reflect the high economic value provided by minerals activities in the Uintah Basin.</p> <p>See also comment responses SO15 and SO37.</p>

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				be 215,260 over the next 20 years, while there are 1,578 jobs attributable to recreation. We question the rationale for increasing recreational opportunities at the expense of oil and gas development, which would decrease the revenues to the state, counties, and Tribes, as well as decrease the supply of oil and gas to the public. In addition, a decrease in future oil and gas development is contrary to the President's Energy Policy.	
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SO45 (SO-P) (JSO-3)	Tables 3.12.3 and 3.12.7 in Chapter 3 should indicate that the "Mining" category includes oil and gas employment.	Tables 3.12.3 and 3.12.7 in the PRMP/FEIS have been revised to indicate that the "mining" category includes oil and gas employment.
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SO47 (SO-R) (JSO-4)	The draft RMP/EIS fails to effectively address the full realm of positive economic benefits associated with current and future oil and gas activities. While Section 4.12 provides a brief comparison of wells to be drilled, industry jobs that would be created, industry sales, and federal royalties under each alternative, what appears to have been excluded is the highly significant state and local revenue generated due to a variety of taxes paid.	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten. The BLM believes this revision represents the importance of this industry to the Vernal planning area.
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SO48 (SO-S) (JSO-5)	The socioeconomic analysis contained in Section 4.12 of the draft Vernal RMP/EIS does not adequately describe the long-term incremental and cumulative differences in public sector revenues of the four alternatives. Specifically, the section fails to discuss the property tax revenues that each alternative would generate and the various community	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten and discusses the fiscal impacts to local government of the alternative decisions affecting the oil and gas industry in the Vernal planning area.

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				facilities and services that this significant source of revenue funds for residents in the Vernal planning area. As an example, according to the Uintah County Treasurer's office, fully 57.6% of that county's 2004 property tax revenue was derived from the oil and gas and mining industries. Accordingly, management decisions that influence the level of oil and gas activity have direct and significant impacts on local government fiscal conditions in the VPA and indirect impacts on the quality of life of Vernal planning area residents. These impacts must be disclosed in the draft RMP/EIS.	
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SO49 (SO-T) (J-SO7)	The Draft RMP/EIS does not address Utah severance taxes. Severance taxes on natural gas are assessed on a sliding scale, 3% on the first \$1.50/Mcf, and 5% percent thereafter. The draft RMP/EIS does not estimate the differences in severance taxes for each alternative. Given that oil and gas production from the Vernal planning area was a substantial portion of the state's total, it is important to understand the implications of each alternative for State of Utah severance tax revenues.	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten and discusses the fiscal impacts to local government (including severance taxes) of the alternative decisions affecting the oil and gas industry in the Vernal planning area.
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SO50 (SO-U) (J-SO8)	The absence of a more complete fiscal assessment will impede the ability of the public, local governments, and BLM decision-makers to assess the effects of each alternative on local government revenues and on their ability to provide public services,	Section 4.12 in the PRMP/FEIS has been revised to expand the discussion of the fiscal impacts to state and local governments.  The BLM will review the Utah State University survey of rural counties conducted by the State

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				which directly affect the quality of life of Vernal planning area residents. Moreover, the limited scope fiscal analysis in the Draft RMP/EIS does not fulfill the BLM's charge to assess the degree of local dependence on resources from public lands, or fulfill the agency's obligations outlined in Land-use Planning Handbook (H-1601-H) or Instruction Memorandum No. 2002-167.	of Utah. The BLM has received preliminary data from this study received after completion of the DEIS. The BLM has incorporated findings in the PRMP/FEIS as appropriate.
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SO51 (SO-V) (J-SO9)	The Draft RMP/EIS assumes development costs of \$600,000 per well. This figure is dated and does not account for other types of development taking place in the Vernal planning area. The deeper formations being developed cost more than the figure used above and the analysis should reflect this fact. This number should be revised to ensure that any economic analysis accounts for the activities in the planning area. Regardless of this oversight, the impact analysis does not address the extent these expenditures would occur in the local economy, nor do they address how the economy would be impacted both locally and nationally. Indirect employment as a result of industry expenditures and the additional tax revenue this spending activity would generate are important impacts the Draft RMP/EIS should disclose. A study was prepared that estimated that eighty-one percent (81%) of the expenditures for development benefited the local economy. On that assumption, the numbers should be reworked to reflect this	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten. The PRMP/FEIS incorporates recent data provided by the US Bureau of Labor Statistics and the State of Utah Division of Oil, Gas and Mining. This data has been used in the recent (November, 2007) study commissioned by the State of Utah: The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry Phase I - The Uinta Basin.

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				significant detail.	
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SO52 (SO-W)	<p>The statement in Section 4.12.2.2, paragraphs 3 and 4 that areas open to (minerals) exploration "would have an adverse impact on the recreation and tourism industries" and that "the quality of the recreational experience would be degraded along with possible decreases to visual quality..." is incorrect. In much of the Vernal planning area, mineral exploration and development activity would occur in remote areas that are not popular for recreation or visually sensitive. At present, mineral development and recreational activities generally take place in separate geographic areas and co-exist quite successfully in the Vernal planning area. As examples, no mineral development would occur within the recreationally significant Flaming Gorge National Recreation Area, Dinosaur National Monument, nor along much of the Green River (due to NSO and CSU stipulations intended to protect recreational, scenic, and other natural resources values of the river corridor). In addition, despite the substantial increase in oil and gas exploration and development that has occurred in the Vernal planning area over the last 15 years, tourism has increased rather than decreased. This fact directly contradicts the baseless statement that mineral development hurts the tourist economy and employment in the Vernal planning area.</p>	<p>Section 4.12.2.2 in the PRMP/FEIS has been revised to delete the statements as suggested in the comment.</p> <p>See also comment responses SO15 and SO37.</p>

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SO54 (SO-Y) (J-SO12)	<p>The draft RMP/EIS states that the rationale for decreasing mineral development is to increase recreation and OHV opportunities in the Vernal Planning Area. According to the information presented in Table 4.12.1, the economic value of oil and gas sales in the Vernal planning area is currently \$189.53 million and \$248.68 million, respectively. Royalties are currently more than \$8.6 million annually. According to the draft RMP/EIS recreation currently provides a total tax benefit at approximately \$1.6 million. The revenues from royalties, alone, are more than five times the tax benefits from recreation.</p> <p>Under Alternative D (existing conditions) the total number of jobs, based on the average number of employees per well, is estimated to be 215,260 over the next 20 years, while there are 1,578 jobs attributable to recreation. We question the rationale for increasing recreational opportunities at the expense of oil and gas development, which would decrease the revenues to the state, counties, and Tribes, as well as decrease the supply of oil and gas to the public. In addition, a decrease in future oil and gas development is contrary to the President's Energy Policy.</p>	<p>The jobs created per well has been revised in the FEIS. Based on data from the US Bureau of Labor Statistics, and the State of Utah Division of Oil, Gas and Mining, it is more reasonable to project an increase approximating 3.74 new jobs per well drilled than the approximately 14 suggested in the UEO study, which was for only one well. The impact analysis in Chapter 4 will be rewritten to reflect this lower estimate. The FEIS will continue to reflect the high economic value provided by minerals activities in the Uintah Basin.</p> <p>See also comment responses SO15 and SO37.</p>
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	SO107 (R-SO7)	<p>Modify the following statement as indicated by strikethrough deletions:</p> <p>"The Forest Management Plan for the Ashley</p>	<p>Section 4.22.4 in the PRMP/FEIS has been revised to read as follows:</p> <p>"Additionally, if drilling for oil and gas is allowed</p>

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				National Forest could have a cumulative impact with respect to social and economic conditions by either increasing or decreasing tourism visitation based on allowable activities. Additionally, if drilling for oil and gas is allowed on the forest, it could affect the regional economy by reducing tourism and potentially increasing the oil and gas sector of the economy."	on the forest, it could affect the regional economy potentially increasing the oil and gas sector of the economy. In addition, tourism is likely to lose some of its appeal if the visible oil and gas-related activities or installations, detract from the natural environment."
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	SO107 A (R-SO7)	The discussion of cumulative social and economic impacts entirely omits the role of agriculture. BLM appears to forget that ranching forms part of the economic backbone of these counties.	Section 4.22.4 in the PRMP/FEIS has been revised to add information on the role of agriculture in the counties...
Draft RMP/EIS	Utah Petroleum Association	O-42	SO45 (SO-P) (JSO-3)	Tables 3.12.3 and 3.12.7 in Chapter 3 should indicate that the "Mining" category includes oil and gas employment.	Tables 3.12.3 and 3.12.7 in the PRMP/FEIS have been revised to indicate that the "mining" category includes oil and gas employment.
Draft RMP/EIS	Utah Petroleum Association	O-42	SO47 (SO-R) (JSO-4)	The draft RMP/EIS fails to effectively address the full realm of positive economic benefits associated with current and future oil and gas activities. While Section 4.12 provides a brief comparison of wells to be drilled, industry jobs that would be created, industry sales, and federal royalties under each alternative, what appears to have been excluded is the highly significant state and local revenue generated due to a variety of taxes paid.	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten. The BLM believes this revision represents the importance of this industry to the Vernal planning area.
Draft RMP/EIS	Utah Petroleum Association	O-42	SO48 (SO-S) (JSO-	The socioeconomic analysis contained in Section 4.12 of the draft Vernal RMP/EIS does not adequately describe the long-term	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten and discusses the fiscal impacts to local government of the alternative

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment	
		5)	incremental and cumulative differences in public sector revenues of the four alternatives. Specifically, the section fails to discuss the property tax revenues that each alternative would generate and the various community facilities and services that this significant source of revenue funds for residents in the Vernal planning area. As an example, according to the Uintah County Treasurer's office, fully 57.6% of that county's 2004 property tax revenue was derived from the oil and gas and mining industries. Accordingly, management decisions that influence the level of oil and gas activity have direct and significant impacts on local government fiscal conditions in the VPA and indirect impacts on the quality of life of Vernal planning area residents. These impacts must be disclosed in the draft RMP/EIS.	decisions affecting the oil and gas industry in the Vernal planning area.	
Draft RMP/EIS	Utah Petroleum Association	O-42	SO49 (SO-T) (J-SO7)	The Draft RMP/EIS does not address Utah severance taxes. Severance taxes on natural gas are assessed on a sliding scale, 3% on the first \$1.50/Mcf, and 5% percent thereafter. The draft RMP/EIS does not estimate the differences in severance taxes for each alternative. Given that oil and gas production from the Vernal planning area was a substantial portion of the state's total, it is important to understand the implications of each alternative for State of Utah severance tax revenues.	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten and discusses the fiscal impacts to local government (including severance taxes) of the alternative decisions affecting the oil and gas industry in the Vernal planning area.
Draft	Utah	O-42	SO50	The absence of a more complete fiscal	Section 4.12 in the PRMP/FEIS has been

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
RMP/EIS	Petroleum Association	(SO-U) (J-SO8)	assessment will impede the ability of the public, local governments, and BLM decision-makers to assess the effects of each alternative on local government revenues and on their ability to provide public services, which directly affect the quality of life of Vernal planning area residents. Moreover, the limited scope fiscal analysis in the Draft RMP/EIS does not fulfill the BLM's charge to assess the degree of local dependence on resources from public lands, or fulfill the agency's obligations outlined in Land-use Planning Handbook (H-1601-H) or Instruction Memorandum No. 2002-167.	revised to expand the discussion of the fiscal impacts to state and local governments.  The BLM will review the Utah State University survey of rural counties conducted by the State of Utah. The BLM has received preliminary data from this study received after completion of the DEIS. The BLM has incorporated findings in the PRMP/FEIS as appropriate.
Draft RMP/EIS	Utah Petroleum Association	O-42 SO51 (SO-V) (J-SO9)	The Draft RMP/EIS assumes development costs of \$600,000 per well. This figure is dated and does not account for other types of development taking place in the Vernal planning area. The deeper formations being developed cost more than the figure used above and the analysis should reflect this fact. This number should be revised to ensure that any economic analysis accounts for the activities in the planning area. Regardless of this oversight, the impact analysis does not address the extent these expenditures would occur in the local economy, nor do they address how the economy would be impacted both locally and nationally. Indirect employment as a result of industry expenditures and the additional tax revenue this spending activity would generate are important impacts the Draft RMP/EIS should	Section 4.12.3.2 in the PRMP/FEIS has been extensively rewritten. The PRMP/FEIS incorporates recent data provided by the US Bureau of Labor Statistics and the State of Utah Division of Oil, Gas and Mining. This data has been used in the recent (November, 2007) study commissioned by the State of Utah: The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry Phase I - The Uinta Basin.

Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				disclose. A study was prepared that estimated that eighty-one percent (81%) of the expenditures for development benefited the local economy. On that assumption, the numbers should be reworked to reflect this significant detail.	
Draft RMP/EIS	Utah Petroleum Association	O-42	SO54 (SO-Y) (J-SO12)	<p>The draft RMP/EIS states that the rationale for decreasing mineral development is to increase recreation and OHV opportunities in the Vernal Planning Area. According to the information presented in Table 4.12.1, the economic value of oil and gas sales in the Vernal planning area is currently \$189.53 million and \$248.68 million, respectively. Royalties are currently more than \$8.6 million annually. According to the draft RMP/EIS recreation currently provides a total tax benefit at approximately \$1.6 million. The revenues from royalties, alone, are more than five times the tax benefits from recreation.</p> <p>Under Alternative D (existing conditions) the total number of jobs, based on the average number of employees per well, is estimated to be 215,260 over the next 20 years, while there are 1,578 jobs attributable to recreation. We question the rationale for increasing recreational opportunities at the expense of oil and gas development, which would decrease the revenues to the state, counties, and Tribes, as well as decrease the supply of oil and gas to the public. In addition, a decrease</p>	<p>The jobs created per well has been revised in the FEIS. Based on data from the US Bureau of Labor Statistics, and the State of Utah Division of Oil, Gas and Mining, it is more reasonable to project an increase approximating 3.74 new jobs per well drilled than the approximately 14 suggested in the UEO study, which was for only one well. The impact analysis in Chapter 4 will be rewritten to reflect this lower estimate. The FEIS will continue to reflect the high economic value provided by minerals activities in the Uintah Basin.</p> <p>See also comment responses SO15 and SO37.</p>

**Table 5.13t. Comments Requiring a Change in the Document: Socioeconomics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				in future oil and gas development is contrary to the President's Energy Policy.	
Draft RMP/EIS	Utah Petroleum Association	O-42	SO59 (JSO-6)	Oil and gas-related sales and use taxes are significant. The oil and gas industry makes significant contributions to sales and use tax revenues in their purchases of substantial quantities of goods and services. Also oil and gas industry workers spend their earnings in local communities, thereby also adding to the sales tax revenue. The draft RMP does not estimate this contribution or project the impacts of each alternative on sales and use tax revenues.	The sales tax information will be included in the PRMP/FEIS based on information the Counties have provided. In Section 4.12.3.2, contributions from industry workers are discussed.

**Table 5.13u. Comments Requiring a Change in the Document: Special Status Species**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS101 (JSS-59)	Species-specific analyses should be provided under each resource use to allow easy referencing. As currently written, it is difficult to determine if all effects for all species have been properly analyzed; for example, there is no discussion of sage grouse in the Fire and Woodland Management or Forage Allocation sections. In addition, the effects discussions are too generalized. Recommend using headings under each resource use, e.g., Mexican Spotted	Section 4.15.1 in the PRMP/FEIS has been revised to clarify the impacts analysis.

**Table 5.13u. Comments Requiring a Change in the Document: Special Status Species**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				Owl, Bald Eagle, Canada Lynx, Listed Fish Species, etc. This will also provide a more comprehensive analysis and discussion of species-specific effects from resource use activities.	
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS102 (JSS-60)	This entire discussion appears focused on listed species. Analysis of effects to all special status species should be included in this section.	Section 4.15.1 includes a general discussion of the impacts to all special status species based on impacts to habitat types used by these species. The links between these habitat types and the special status species are disclosed in Table 3.15.2 of the PRMP/FEIS.  Section 4.15.1   the PRMP/FEIS has been revised to clarify this link and provide additional detail regarding potential impacts to non-listed special status species.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS109 (JSS-67)	Black-footed ferret: Include habitat loss and fragmentation as potential impacts.	Table 4.15.1 in the PRMP/FEIS has been revised to include habitat loss and fragmentation as potential impacts to black-footed ferrets.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS110 (JSS-68)	Bald Eagle: Habitat loss and fragmentation on deer winter ranges can also negatively impact bald eagles by reducing their forage resource of carrion.	Table 4.15.1 in the PRMP/FEIS has been revised to include habitat loss and fragmentation as potential impacts on deer winter range Bald Eagles.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS114 (JSS-72)	3rd paragraph: Provide a reference for the following statement "According to data supplied by the BLM, the USFWS believes that the ferruginous hawk population could be lost in the Uintah Basin..."	Section 4.15.2.6.1.1 in the PRMP/FEIS has been revised to include a reference for the statement cited in the comment.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS117 (JSS-	3rd paragraph: Note that the Bald Eagle is also managed under authority of the Endangered	Section 4.15.3 of the PRMP/FEIS has been revised to provide a reference for the

**Table 5.13u. Comments Requiring a Change in the Document: Special Status Species**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
	Service		75)	Species Act and Eagle Protection Act. It is also likely that nest sites will occur on BLM land during the implementation of this RMP revision. We recommend including management of Bald Eagle nest sites.	Endangered Species Act and Eagle Protection Act.  Protections for eagle nests are outlined in Appendices H and K.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS81 (JSS-38)	Edit the 3rd paragraph,  "In collaboration with the USFWS, DWR, and other partners, develop and implement habitat management plans or conservation strategies for sensitive species."	Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to make the suggested wording change.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS82 (JSS-39)	Add Mexican Spotted Owl to this list. Include the following commitments: 1) Establish Protected Activity Centers (PACs) at all known Mexican Spotted Owl nest sites, 2) Maintain habitat to support small mammal populations as a prey base for Mexican spotted owls in occupied and suitable owl habitats, and 3) Retain large down logs, large trees, and snags as prey habitats in occupied and suitable Mexican spotted owl habitats.	Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to include the Mexican Spotted Owl.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS83 (JSS-40)	Edit the Bald Eagle discussion to read:  "Protect and restore cottonwood bottoms for Bald Eagle winter habitat... as well any new roost and nest sites.... "	Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to make the suggested wording change.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS85 (JSS-42)	The UDWR is currently the lead in developing a multi-state Conservation Agreement for the roundtail chub, flannelmouth sucker, and bluehead sucker. As this should be final during the lifetime of this RMP, we recommend you	Section 2.4.1.4.4.3 in the Final EIS has been revised to add the Conservation Agreement for the roundtail chub, flannelmouth sucker, and bluehead sucker.

**Table 5.13u. Comments Requiring a Change in the Document: Special Status Species**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				manage them as Conservation Agreement Species.	
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS91 (JSS-48)	There are 12 listed and 4 candidate species within the VPA, not 15 and 1. See also page 4-231.	These changes have been made in Table 3.15.1 of the PRMP/FEIS.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS94 (JSS-51)	Identify the occurrence of 7 Bald Eagle nest sites in Utah. Closest known nests to the project area are northwest of Manila, and on the Duchesne River between Duchesne and Bridgeland. There is the potential for bald eagle nest sites to occur on BLM lands in the Vernal Field Office area.	Table 3.15.1 in the PRMP/FEIS has been revised to include information regarding the presence of these nests and the potential occurrence of nests in the Vernal Field Office planning area.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	SS99 (JSS-56)	Provide a list of the 17 listed and 28 sensitive species.	Section 4.15 in the PRMP/EIS has been revised to reflect the Utah Sensitive Species List under authority of IM UT 2007-078.
Draft RMP/EIS	Questar	O-12	SS120 (LSS-2)	Alternative A in Appendix K states that no exemptions or waivers will be allowed but the section on raptor nests claims there may be. Same contradiction in sage grouse section	Appendix K and Sections 4.8.2.5.1.1 and 4.8.2.5.1.2 in the PRMP/FEIS have been revised to correct inconsistencies described in the comment.
Draft RMP/EIS	Newfield Exploration Co.	O-13	SS27 (SS-A)	The BLM should limit the scope of the sage grouse stipulations to ACTIVE leks and define active vs. inactive leks. Newfields leases contain a lek that is surrounded by development and has been inactive for several years. Do you intend these stipulations to apply to maintenance and operations of existing facilities near an inactive lek? Within 0.5 mile of active leks, do you intend to require operations to retrofit existing equipment with best available	These stipulations do not apply to maintenance and work-over operations. Information clarifying the scope of the sage grouse stipulations in terms of lek activity has been included in the FEIS.

**Table 5.13u. Comments Requiring a Change in the Document: Special Status Species**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				technology to reduce noise.	
Draft RMP/EIS	IPAMS	O-14	SS120 (LSS-2)	Alternative A in Appendix K states that no exemptions or waivers will be allowed but the section on raptor nests claims there may be. Same contradiction in sage grouse section	Appendix K and Sections 4.8.2.5.1.1 and 4.8.2.5.1.2 in the PRMP/FEIS have been revised to correct inconsistencies described in the comment.
Draft RMP/EIS	IPAMS	O-14	SS128 (LSS-10)	Text is inconsistent in amount of acreage available to oil and gas than stated in Table S.1 and Table 4.8.1	Tables S.1 and Table 4.8.1 in the PRMP/FEIS have been revised to correct inconsistencies described in the comment.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SS36 (SS-J)	This section states that "although most of the riparian zone is listed as NSO, this stipulation could be waived if necessary for transmission lines, roads and surface occupancy." The conditions for granting of a "waiver" in Chapter 4 of the draft RMP/EIS are inconsistent with the stipulation for riparian floodplains described in Appendix K, which does not grant a waiver to NSO. It allows an "exception," which is defined in Appendix K as a one-time exemption from a stipulation.	Section 4.15.1.3 in the PRM/FEIS has revised the statement to read as an exception rather than a waiver.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	SS39 (SS-M)	This section states that the number of acres open to oil and gas leasing on Vernal BLM lands is 1,776,782 acres. However, Table S.1 and Table 4.8.1 state that the acres open to oil and gas leasing are 1,843,265 acres. These numbers are not consistent. Please correct and give the precise area of the acres in question for further identification, evaluation and consistency review.	Section 4.15.2.3.1.1 in the PRMP/FEIS has been revised to correct the inconsistencies described in the comment.
Draft RMP/EIS	Westport Oil and Gas	O-28	SS42	The RMP states that the Ferruginous Hawk population could be irretrievably lost due to	Section 4.15.6 in the PRMP/FEIS has been revised to add the following information:

**Table 5.13u. Comments Requiring a Change in the Document: Special Status Species**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
	Company		(SS-P)	impacts from surface disturbance for mineral development, habitat fragmentation, and habitat loss. The draft RMP/EIS provides no evidence that mineral development has or would cause declines in Ferruginous Hawk populations. Provide the data in the EIS to support this statement or delete the statement	<p>"As a species Ferruginous Hawks have two characteristics that seem to make them more susceptible to disturbance-their preference for solitude when nesting and their high dependence on primary prey species (rabbits and/or ground squirrels). Bechard et al. (1990) showed Ferruginous Hawks' tendency for solitude by proving that their nest site selection is significantly further from roads and human habitation than other sympatric hawks. White and Thurow (1985) documented Ferruginous Hawk sensitivity to human disturbances when they found that 33% of briefly disturbed nests were deserted and the other nest had lower fledging success. In years of low prey abundance, sensitivity to disturbance increased and larger buffer zones were recommended to protect nesting pairs. Holmes et al. (1993) documented Ferruginous Hawk sensitivity to walking and vehicular disturbances and recommended a buffer zone to protect nesting attempts. (Reproductive Success and Nesting Chronology of Ferruginous Hawks in Northwestern Utah From 1997-1999. United States Department of Interior, BLM, Salt Lake Field Office. Page 5 Paragraph 1.</p> <p>Mining disturbance is linked to nest desertion (Olendorff 1993). Pairs nesting near active petroleum wells experience lower productivity than those that nest further away. Railroads apparently are not a disturbance, but pairs have</p>

Table 5.13u. Comments Requiring a Change in the Document: Special Status Species

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					<p>been found to nest farther from primary and secondary roads than Swainson's Hawks do. (Bechard et al. 1990)"</p> <p>"Olendorff (1993) attributed population declines to the effects of cultivation, grazing, poisoning, and controlling small mammals, mining, and fire in nesting habitats, with cultivation being the most serious."</p>
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SS36 (SS-J)	This section states that "although most of the riparian zone is listed as NSO, this stipulation could be waived if necessary for transmission lines, roads and surface occupancy." The conditions for granting of a "waiver" in Chapter 4 of the draft RMP/EIS are inconsistent with the stipulation for riparian floodplains described in Appendix K, which does not grant a waiver to NSO. It allows an "exception," which is defined in Appendix K as a one-time exemption from a stipulation.	Section 4.15.1.3 in the PRM/FEIS has revised the statement to read as an exception rather than a waiver.
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	SS39 (SS-M)	This section states that the number of acres open to oil and gas leasing on Vernal BLM lands is 1,776,782 acres. However, Table S.1 and Table 4.8.1 state that the acres open to oil and gas leasing are 1,843,265 acres. These numbers are not consistent. Please correct and give the precise area of the acres in question for further identification, evaluation and consistency review.	Section 4.15.2.3.1.1 in the PRMP/FEIS has been revised to correct the inconsistencies described in the comment.
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore	O-29	SS42 (SS-P)	The RMP states that the ferruginous hawk population could be irretrievably lost due to impacts from surface disturbance for mineral	Section 4.15.6 in the PRMP/FEIS has been revised to add the following information:

**Table 5.13u. Comments Requiring a Change in the Document: Special Status Species**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
	LLC			development, habitat fragmentation, and habitat loss. The draft RMP/EIS provides no evidence that mineral development has or would cause declines in Ferruginous Hawk populations. Provide the data in the EIS to support this statement or delete the statement	<p>"As a species Ferruginous Hawks have two characteristics that seem to make them more susceptible to disturbance-their preference for solitude when nesting and their high dependence on primary prey species (rabbits and/or ground squirrels). Bechard et al. (1990) showed Ferruginous Hawks' tendency for solitude by proving that their nest site selection is significantly further from roads and human habitation than other sympatric hawks. White and Thurow (1985) documented ferruginous hawk sensitivity to human disturbances when they found that 33% of briefly disturbed nests were deserted and the other nest had lower fledging success. In years of low prey abundance, sensitivity to disturbance increased and larger buffer zones were recommended to protect nesting pairs. Holmes et al. (1993) documented ferruginous hawk sensitivity to walking and vehicular disturbances and recommended a buffer zone to protect nesting attempts. (Reproductive Success and Nesting Chronology of Ferruginous Hawks in Northwestern Utah From 1997-1999. United States Department of Interior, BLM, Salt Lake Field Office. Page 5 Paragraph 1.</p> <p>Mining disturbance is linked to nest desertion (Olendorff 1993). Pairs nesting near active petroleum wells experience lower productivity than those that nest further away. Railroads apparently are not a disturbance, but pairs have</p>

Table 5.13u. Comments Requiring a Change in the Document: Special Status Species

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					<p>been found to nest farther from primary and secondary roads than Swainson's Hawks do. (Bechard et al. 1990)"</p> <p>"Olendorff (1993) attributed population declines to the effects of cultivation, grazing, poisoning, and controlling small mammals, mining, and fire in nesting habitats, with cultivation being the most serious."</p>
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	SS152B (R-SS2)	<p>Research does not support the assumption of adverse impacts from mineral development. Comments submitted to the USFWS opposing the listing of the sage grouse strongly suggest that neither livestock grazing nor oil and gas development are directly connected to reported declines in sage grouse. Certainly recent drought is a factor, which is largely ignored. This discussion needs to be modified to reflect other scientific viewpoints.</p>	<p>The potential impacts of mineral development to sage grouse habitat that are described in the Draft EIS are due to the potential removal of that habitat. Citations regarding research on drought, mineral, and grazing impacts on sage grouse habitat will be provided in the Final EIS.</p> <p>The section the commenter is referring to addresses impacts of minerals decisions on special status species. Impacts from other resource decisions are discussed elsewhere in the document.</p> <p>Information and references have been added to the Final EIS to support the assertion of impacts to sage-grouse habitat from mineral development.</p>
Draft RMP/EIS	Center for Native Ecosystems	O-38	SS53 (JSS-10)	<p>Graham's and White River penstemon not listed in the oil-shale endemics page 4-233 says that Graham's penstemon is in severe decline, but only lists the reed-mustards as species restricted to oil shale formations.</p>	<p>Clay reed mustard is not an oil shale endemic. Section 4.15.1.3 in the PRMP/FEIS has been revised to read:</p> <p>"This threat is particularly high for shrubby reed</p>

**Table 5.13u. Comments Requiring a Change in the Document: Special Status Species**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					mustard, White River beardtongue and Graham's beardtongue, as they are restricted to geologic formations containing oil shale."
Draft RMP/EIS	Center for Native Ecosystems	O-38	SS55 (JSS-12)	The draft RMP concludes that "The potential impacts to Uintah Basin hookless cactus, clay reed mustard, shrubby reed mustard, Graham's beardtongue, and White River beardtongue are expected to be high with oil, gas and coal bed methane development". Clearly the BLM is violating ESA, NEPA, FLPMA, and APA by allowing high levels of impacts in habitat for extremely narrowly distributed listed and candidate plant species under the preferred alternative.	Although the potential effects of oil and gas development are expected to be high, standard stipulations for oil and gas development allow for movement of drilling operations to avoid and/or minimize impacts to these species. The determination regarding specific avoidance or mitigation measures are necessary to comply with ESA, NEPA, FLPMA, and APA will be determined at the site-specific level. The Final EIS has been amended to include information regarding the range of avoidance and mitigation options for these species, as well as the projected impacts subsequent to implementation of these measures.

**Table 5.13v. Comments Requiring a Change in the Document: Travel**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Duchesne County	G-9	TR32 (TR-P)	Construction of new roads across riparian areas does not create an irreversible loss of habitat. If such roads are deemed to no longer serve a public purpose after the activity they serve is completed, such roads can be removed and the habitat restored.	Section 4.11.1 in the PRMP/FEIS has been revised to read as follows:  "Depending upon the types of construction methods and materials used, roads built across riparian areas would result in a direct loss of

Table 5.13v. Comments Requiring a Change in the Document: Travel

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					riparian habitat at the site of the crossing. The loss of habitat would continue until the reclamation of the road occurs and traffic diminishes to a point that riparian habitat can reestablish itself."
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	TR67 (R-TR10)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Access to public lands is provided throughout the VPA. BLM must provide access to inholdings or access pursuant to a permit or lease. In situations when BLM is not required to grant a right-of-way pursuant to law or regulation, BLM can close or limit access, Access should be closed or restricted, where necessary, to protect public health and safety and to protect significant resource values."</p>	<p>Section 3.6.6 in the PRMP/FEIS has been revised to read as follows:</p> <p>"Access to public lands is provided throughout the VPA. Access should be closed or restricted, where necessary, to protect public health and safety and to protect significant resource values. Easements can be acquired to provide access to public lands for recreational, wildlife, range, cultural/historical, mineral, ACEC, special management areas, and other resource needs. Note that all valid existing leases and rights are acknowledged by the BLM, and management actions implemented through approval of the Final RMP and Record of Decision do not apply retroactively to these leases and rights."</p>
WSA Supplement	Duchesne County Commission	G-10	52	Pages 4-186 and 4-187, Section 4.21.2.7.3: The 3rd and last paragraphs in this section appear to be repetitive.	The document will be revised to reflect the comment.
WSA Supplement	Steven Manning	O-180	4	In this same section, as referenced above, motorized use is discussed separately from OHV use. However, in nearly all the discussions throughout the Supplement, there is very little if any discussion of the impacts, or even the existence of something called	<p>The glossary will be updated to reflect the definition of OHV and the definition of motorized travel within the Proposed EIS</p> <p>Additionally, clarification will be provided as part of a comprehensive travel management plan that</p>

**Table 5.13v. Comments Requiring a Change in the Document: Travel**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				<p>"motorized travel", which we assume is different from OHV travel. This designation leads to many questions: How is motorized travel defined? Is it different from OHV travel? In what category are licensed passenger vehicles (automobiles and light trucks) placed? Is travel limited to existing roads or designated roads? What is the difference between existing and designated? How will each Alternative in so-called "non-WSA lands with wilderness characteristics" impact licensed passenger vehicles traveling on existing roads?</p>	<p>will be completed within 1-5 years after the Record of Decision as per H-1601-1.</p>

**Table 5.13w. Comments Requiring a Change in the Document: Vegetation**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	VE7	<p>This paragraph should be changed to read:</p> <p>"Wyoming and mountain big sagebrush are declining..."</p> <p>The UDWR recommends adding discussion regarding the recent sagebrush mortality in the RMP.</p>	<p>Section 3.16.1.3 in the PRMP/FEIS has been revised to include the following:</p> <p>"Wyoming and mountain big sage are declining...Beginning in the late 1990s, drought accelerated the decline which resulted in a sage die-off and die-back. Some areas had sagebrush mortality while others had re-growth on the sagebrush in subsequent years.</p>

**Table 5.13w. Comments Requiring a Change in the Document: Vegetation**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Duchesne County	G-9	VE1	Duchesne County has adopted a list of noxious weeds, which was provided to the BLM staff at the February 9, 2005 open house in Duchesne. The status column in this table may need to be amended accordingly.	All of the plants listed in the comment are already included in Table 3.16.6 except for Tamarisk, which is discussed at the end of Section 3.16.2. The "Status" column of Table 3.16.6 has been revised to identify which of the plants are listed by Duchesne County as noxious weeds.
Draft RMP/EIS	Duchesne County	G-9	VE3	Alternative C would have lesser beneficial impacts on vegetation resources than Alternative A (not more). This is because Alternative C would not automatically provide for the same level of vegetation removal as Alternative A, which increases the chances for catastrophic wild fires (see Section 4.13.2.14.3).	The woodland and forest species salvaging is proposed for Alternative A and limited in Alternative C (Section 4.13.2.14.3). The level of this activity under Alternative A would have long-term adverse impacts to soil and water resources because of surface disturbance and subsequent soil erosion and sedimentation in streams. These effects would adversely affect the vegetation under Alternative A, and less so under Alternative C. In fact, the two alternatives are probably comparable in their effect on vegetation. The PRMP/FEIS has been revised to reflect this analysis.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	VE23 (JVE-8)	Last paragraph, 3rd sentence: "However, some areas of tamarisk are currently protected as critical habitat for the federally endangered southwestern willow flycatcher, which further complicates its management." Although southwestern willow flycatchers have been possibly identified along the White River near Ouray (genetics testing has not yet been completed), the VPA does not contain any designated critical habitat for the species.	The commenter is correct. The Vernal Planning Area contains no designated critical habitat for the southwestern willow flycatcher. Section 3.16.2 of the PRMP/FEIS has been revised to reflect the issue made in the comment.
Draft	U.S. Fish	G-12	VE-6	"Unique features within the planning area	Section 1.4 of the PRMP/EIS has been revised

Table 5.13w. Comments Requiring a Change in the Document: Vegetation

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS	and Wildlife Service			include...the Pariette Wetlands, which provide habitat for over 100 species of wildlife." What about plants?	to acknowledge the plant communities of the Pariette Wetlands.
Draft RMP/EIS	UBAOG	G-22	VE3	Alternative C would have lesser beneficial impacts on vegetation resources than Alternative A (not more). This is because Alternative C would not automatically provide for the same level of vegetation removal as Alternative A, which increases the chances for catastrophic wild fires (see Section 4.13.2.14.3).	The woodland and forest species salvaging is proposed for Alternative A and limited in Alternative C (Section 4.13.2.14.3). The level of this activity under Alternative A would have long-term adverse impacts to soil and water resources because of surface disturbance and subsequent soil erosion and sedimentation in streams. These effects would adversely affect the vegetation under Alternative A, and less so under Alternative C. In fact, the two alternatives are probably comparable in their effect on vegetation. The PRMP/FEIS has been revised to reflect this analysis.
Draft RMP/EIS	Westport Oil and Gas Company	O-28	VE9 (VE-A)	There appear to be several errors in calculating vegetation disturbance. For example, adding the acres of disturbance for standard stipulations and timing limitations and controlled surface use does not equal 1,776,782. "Estimated surface disturbance by individual well development" does not total 18,971 acres. According to Table 4-1, surface disturbance would be less than 5 acres per well. The percent increase and increase of disturbance between Alternative A and Alternative D also should be recalculated. Table 4.16.6 shows 18,971 acres as total disturbance under Alternative A. This total is obtained by combining the short- and long- term disturbance. However,	Section 4.16.2.5.1 in the PRMP/FEIS has been revised to correct the errors.

Table 5.13w. Comments Requiring a Change in the Document: Vegetation

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				some short-term disturbance would continue over the life of the project and be included as long-term disturbance. As a result of this overlap, the two totals cannot be added together. These errors need to be corrected.	
Draft RMP/EIS	KerrMcGee Oil and Gas Onshore LLC	O-29	VE9 (VE-A)	There appear to be several errors in calculating vegetation disturbance. For example, adding the acres of disturbance for standard stipulations and timing limitations and controlled surface use does not equal 1,776,782. "Estimated surface disturbance by individual well development" does not total 18,971 acres. According to Table 4-1, surface disturbance would be less than 5 acres per well. The percent increase and increase of disturbance between Alternative A and Alternative D also should be recalculated. Table 4.16.6 shows 18,971 acres as total disturbance under Alternative A. This total is obtained by combining the short- and long- term disturbance. However, some short-term disturbance would continue over the life of the project and be included as long-term disturbance. As a result of this overlap, the two totals cannot be added together. These errors need to be corrected.	Section 4.16.2.5.1 in the PRMP/FEIS has been revised to correct the errors.
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	VE38 (R-VE8)	Modify the following statement as indicated by bolded additions:  "Impacts to livestock and grazing resources would occur under all of the proposed alternatives. The impacts could include	Section 4.7.1 in the PRMP/FEIS has been revised to include the bolded comment text.

Table 5.13w. Comments Requiring a Change in the Document: Vegetation

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				<p>those caused by road and trail construction and maintenance, wellpad construction, vehicle traffic, accidental spills of potentially hazardous materials, and noxious weed infestations. These impacts are generally mitigated as part of the conditions of approval."</p> <p>The RMP overstates the impacts on livestock grazing from energy development. The amount of land used for energy is relatively small and disruption occurs for a relatively short period of time. In some cases, dust will benefit the plants as well.</p>	
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	VE39A (R-VE9)	The RMP omits the role of wildlife and wind in facilitating noxious weed problems. These factors exist in the planning area and have little or nothing to do with energy development.	Wind has been added as a contributing factor to the spread of noxious weeds in Section 3.16.2 of the PRMP/FEIS.
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	VE46 (R-VE16)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Decisions making lands unavailable for upland surface disturbance and riparian corridor disturbance may benefit would be beneficial to riparian resources. Beneficial impacts may would result from stubble height requirements, utilization levels, reduced use, and season of use changes that are proposed in some of the</p>	Section 4.11 in the Final EIS text has been revised to include the suggested wording changes.

Table 5.13w. Comments Requiring a Change in the Document: Vegetation

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				alternatives."  This statement may not be accurate where natural erosion is the major or only factor in sedimentation. Similarly, limiting surface disturbance for vegetation treatments may prevent improvement of upland vegetation, which will also not benefit riparian resources.	
Draft RMP/EIS	Ranges West	O-43	VE15 (AVE-4)	The juniper common to the Vernal Resource Area is Utah juniper ( <i>Juniperus utahensis</i> ) not western juniper ( <i>Juniperus occidentalis</i> ). Someone needs to take range plants class.	Section 4.15.1.4 in the PRMP/FEIS has been revised to clarify that the juniper found in the VRA is Utah juniper and not western juniper.
WSA Supplement	US EPA	G-6	45	Section 3.16.2, Invasive Species and Noxious Weeds, pages 3-112 and 3-113: The document notes, "Of particular management concern are potential and existing populations of invasive species in the oil and gas fields that are receiving increased activity and interest". However, the document does not analyze the options and effectiveness of various invasive species.	Section XXX provides for vegetation treatment (specific to noxious weed control) under all alternatives using fire, mechanical, biological, or chemical means without specifying any individual management tool that would fall under one of these broad categories. This section also refers to management of vegetation in general terms without specifying individual techniques. This provides the BLM the opportunity to select from the entire range of available tools to undertaken vegetation treatments in the most appropriate way for the location and vegetation in question.  The text has been edited to include the following clarification of vegetation treatments:  "The VFO is aware of the seriousness of the noxious and invasive weed problem on lands

**Table 5.13w. Comments Requiring a Change in the Document: Vegetation**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					<p>within the planning area and will develop a VFO Weed Management Plan, advocating the use of a full spectrum of tools and methods as part of an integrated weed management program. It will address more specifically the Goals, SOPs to be enforced, Strategies and methods to be employed.</p> <p>The Programmatic Environmental Impact Statement for Vegetation Treatments Using Herbicides in 17 Western States has approved a few new herbicides for use on BLM lands, including Plateau®, which will provide the BLM opportunity to treat cheatgrass in some locations. The Record of Decision provides Mitigation Measures and Standard Operating Procedures to be employed by all vegetation treatments, which will be addressed in the VFO Weed Management Plan."</p> <p>The Programmatic Environmental Report for Vegetation Treatments on BLM Lands in 17 Western States addresses integrated vegetation management techniques addressing impacts and cumulative effects of a variety of vegetation treatments including mechanical treatments and chaining.</p>
WSA Supplement	US EPA	G-6	52	Section 4.16 Vegetation, page 4-273: The use of chemical treatments should be limited near "Waters of the United States".	Section XXX provides for vegetation treatment (specific to noxious weed control) under all alternatives using fire, mechanical, biological, or chemical means without specifying any individual management tool that would fall under one of

**Table 5.13w. Comments Requiring a Change in the Document: Vegetation**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					<p>these broad categories. This section also refers to management of vegetation in general terms without specifying individual techniques. This provides the BLM the opportunity to select from the entire range of available tools to undertaken vegetation treatments in the most appropriate way for the location and vegetation in question.</p> <p>The text has been edited to include the following clarification of vegetation treatments:</p> <p>"The VFO is aware of the seriousness of the noxious and invasive weed problem on lands within the planning area and will develop a VFO Weed Management Plan, advocating the use of a full spectrum of tools and methods as part of an integrated weed management program. It will address more specifically the Goals, SOPs to be enforced, Strategies and methods to be employed.</p> <p>The Programmatic Environmental Impact Statement for Vegetation Treatments Using Herbicides in 17 Western States has approved a few new herbicides for use on BLM lands, including Plateau®, which will provide the BLM opportunity to treat cheatgrass in some locations. The Record of Decision provides Mitigation Measures and Standard Operating Procedures to be employed by all vegetation treatments, which will be addressed in the VFO Weed Management Plan."</p>

**Table 5.13w. Comments Requiring a Change in the Document: Vegetation**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					<p>The Programmatic Environmental Report for Vegetation Treatments on BLM Lands in 17 Western States addresses integrated vegetation management techniques addressing impacts and cumulative effects of a variety of vegetation treatments including mechanical treatments and chaining.</p>

**Table 5.13x. Comments Requiring a Change in the Document: Visual Resource Management**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Duchesne County	G-9	VI25	<p>Under Alternative C, the reduction in short-term adverse impact is recognized but the reduction in long-term beneficial impacts (associated with restrictions on fuel reduction in ACEC's) is not.</p>	<p>Section 4.17.2.12.3 has been revised in the PRMP/FEIS as follows:</p> <p>"Alternative C would have similar impacts as Alternative A, except that up to 552,663 acres of forest and woodlands would be available for treatments or harvesting. Forest and woodland species salvage would be allowed only when the woodland or forest resource were threatened, which would reduce the short-term, adverse impacts on visual resources. Excluding woodland salvage within 242,760 acres of proposed ACECs would reduce the long-term beneficial impacts on woodlands because this form of fuel load reduction would not be</p>

**Table 5.13x. Comments Requiring a Change in the Document: Visual Resource Management**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					conducted to reduce the risk of catastrophic wildland fire."
Draft RMP/EIS	Bureau of Indian Affairs	G-2	VI25	Under Alternative C, the reduction in short-term adverse impact is recognized but the reduction in long-term beneficial impacts (associated with restrictions on fuel reduction in ACEC's) is not.	Section 4.17.2.12.3 has been revised in the PRMP/FEIS as follows:  "Alternative C would have similar impacts as Alternative A, except that up to 552,663 acres of forest and woodlands would be available for treatments or harvesting. Forest and woodland species salvage would be allowed only when the woodland or forest resource were threatened, which would reduce the short-term, adverse impacts on visual resources. Excluding woodland salvage within 242,760 acres of proposed ACECs would reduce the long-term beneficial impacts on woodlands because this form of fuel load reduction would not be conducted to reduce the risk of catastrophic wildland fire."
Draft RMP/EIS	UBAOG	G-22	VI19	The same descriptions should be provided for VRM I, III, IV as for VRM II was.	The Final EIS text has been amended to show descriptions for all VRM Management Classes in Appendix K.
Draft RMP/EIS	UBAOG	G-22	VI21	How can 35,900 acres of mineral withdrawals under Alternative D lead to a higher level of visual protection than 36,267 acres of such withdrawals under the three action alternatives?	Section 4.17.2.3.2 in the PRMP/FEIS has been revised to reflect that Alternatives A, B, C, and E provide more acreage for protection of visual resources that does Alternative D.
Draft RMP/EIS	UBAOG	G-22	VI22	It is not correct to say that Alternative B does not specify management actions on slopes greater than 40%. Table 2.3, Page 2-54, states that an approved, engineered	Section 4.17.2.8 in the PRMP/FEIS has been revised to clarify the statement describing the slope management actions for Alternative B.

Table 5.13x. Comments Requiring a Change in the Document: Visual Resource Management

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				plan is required under Alternative B for surface disturbance on slopes greater than 20% (which should include slopes over 40%).	
Draft RMP/EIS	UBAOG	G-22	VI23	It is not logical that Alternative B would have greater negative OHV impacts on visual quality than Alternative D. Alternative B has much fewer acres open to unrestricted OHV use and both of these alternatives maintain existing roads if they continue to serve a public purpose.	The text in question has been deleted from Section 4.17.2.7.4 of the PRMP/FEIS.
Draft RMP/EIS	UBAOG	G-22	VI24	In the analysis of Alternative B, the long-term beneficial visual impacts associated with woodland forest management are not recognized.	Section 4.17.2.12.2 has been revised in the PRMP/FEIS as follows:  "The long-term beneficial impacts on woodlands would be similar to those discussed under Alternative A."
Draft RMP/EIS	Utah Farm Bureau Federation	O-9	VI21	How can 35,900 acres of mineral withdrawals under Alternative D lead to a higher level of visual protection than 36,267 acres of such withdrawals under the three action alternatives?	Section 4.17.2.3.2 in the PRMP/FEIS has been revised to reflect that Alternatives A, B, C, and E provide more acreage for protection of visual resources that does Alternative D.
Draft RMP/EIS	Utah Farm Bureau Federation	O-9	VI22	It is not correct to say that Alternative B does not specify management actions on slopes greater than 40%. Table 2.3, Page 2-54, states that an approved, engineered plan is required under Alternative B for surface disturbance on slopes greater than 20% (which should include slopes over 40%).	Section 4.17.2.8 in the PRMP/FEIS has been revised to clarify the statement describing the slope management actions for Alternative B.
Draft	Utah Farm	O-9	VI23	It is not logical that Alternative B would have	The text in question has been deleted from

Table 5.13x. Comments Requiring a Change in the Document: Visual Resource Management

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS	Bureau Federation			greater negative OHV impacts on visual quality than Alternative D. Alternative B has much fewer acres open to unrestricted OHV use and both of these alternatives maintain existing roads if they continue to serve a public purpose.	Section 4.17.2.7.4 of the PRMP/FEIS.
WSA Supplement	Duchesne County Commission	G-10	34	Page 4-113, Section 4.17.2.6.5, 4th paragraph: ...the long-term adverse impacts of light pollution adjacent to the Dinosaur National Monument would be mitigated, which would benefit night-time visual quality in that portion of the VPA near the monument.	The BLM agrees that the recommended text would more accurately describe VRM impacts. The text has been changed in the document.
WSA Supplement	Utah State Office of Education, School Land Trust	G-169	9	It should be noted that in creating protected view-shed corridors, the BLM has no rights to control what is done on school lands, even if they can see it. We are concerned that the BLM states that "Indirect impacts of visual resource decisions on mineral development would be adverse. A decrease in the number of potential oil and gas wells would lead to a decrease in royalties paid to the federal government and/or the state of Utah."	<p>Non-BLM lands could be indirectly impacted by RMP decisions both positively and negatively. The analysis in Chapter 4 of the PRMP/FEIS has been modified accordingly.</p> <p>For specifics regarding the impacts on mineral revenue see comment 120-101.</p> <p>The BLM does provide for reasonable access to all SITLA lands under all alternatives (Chapter 2). Information has been added will be added to Chapter 2, Lands and Realty, Management Common to all action alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79).</p>

**Table 5.13x. Comments Requiring a Change in the Document: Visual Resource Management**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					<p>The results of the Utah State University public lands survey and the University of Utah study on the economic impacts of oil and gas development in the Uintah Basin have been incorporated into the Proposed RMP/Final EIS. Chapter 3 summarizes the public lands survey results, and an Appendix has been added showing the raw results for the three counties in the planning area. Data from the University of Utah study has been extensively incorporated into Chapter 4 analysis.</p> <p>The Proposed RMP/Final EIS recognizes the importance of the oil and gas industry to the economic health of the Uintah Basin. The Plan seeks to strike a reasonable compromise between demands on resources and resource protection, within the framework of the BLM's sustained yield, multiple use mandate.</p>

**Table 5.13y. Comments Requiring a Change in the Document: Wilderness Characteristics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
WSA Supplement	EOG Resources, Inc.	B-144	8	Many of the WCAs in the Vernal Resource Area (i.e. Desolation Canyon WCA) overlap with proposed ACECs (i.e. Nine Mile Canyon, Lower Green River and Four Mile Wash ACECs). In reviewing WCAs, it is important	Layering of program decisions is not optional for BLM, but is required by the FLPMA, 1976 and National BLM planning and program specific regulations. The FLPMA directed that management of public lands be on the basis of

**Table 5.13y. Comments Requiring a Change in the Document: Wilderness Characteristics**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			<p>for BLM to concurrently examine proposed ACECs. Many of the proposed ACECs are overbroad, and appear to cover solely wilderness characteristics. BLM has not identified other nationally significant resources and values within these ACECs. Rather, the resources identified are common throughout Utah and the Intermountain West. In sum, wilderness characteristics standing alone do not provide BLM with basis to designate an ACEC.</p> <p>For example, in the Vernal DRMP/EIS, BLM explained that the relevance criteria for the Four Mile Wash ACEC was high value scenery, riparian ecosystem and special status fish. BLM explains that the importance criteria include "spectacular scenery" and home to endangered fish in the Green River. These resources are not nationally significant and can be found common throughout the Vernal resource area and Utah. The relevance and importance of this ACEC is confined to the Green River and is properly covered by the Lower Green River ACEC and/or the proposed protection of the Green River as a wild and scenic river. The purported protection of the lands on the plateau up from the Green River for "scenery" is an unlawful attempt to protect lands as an ACEC for "wilderness characteristics". This scenery is not nationally or regionally significant.</p>	<p>multiple use (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. For example, 43 CFR Group 2500 provides guidance and requirements for Disposition; Occupancy and Use of public lands; Group 2800 for Rights-of-way; Group 3400 for Coal Management; Group 6000 for Designated Wilderness, and Group 8200 for Natural History, part 8351 for Wild and Scenic Rivers. Multiple-use management requires a balancing of the mandates for these separate programs.</p> <p>BLM prepares overlays for land disposition, rights-of-way, coal, wilderness, and other special designation areas, etc., and overlays the information to identify conflicts and opportunities on the public lands. Each overlay is designed to meet the requirements law, regulation and policy for the particular program.</p> <p>BLM's Land-use Planning Handbook requires that specific decisions be made for each resource and use (Appendix C, H-1601-1). The required 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 overlain with the other program decisions and inconsistent decisions are identified and modified to be compatible with the objectives of the alternative. The potential conflicts between programs identified in the</p>

**Table 5.13y. Comments Requiring a Change in the Document: Wilderness Characteristics**

Comment Period	Commenter Name	Comment Number & Resource Category	Comment Text	Response to Comment
			<p>Accordingly, designation of the Four Mile Wash ACEC would be unwarranted and unlawful. Since BLM has provided no further basis that resources to the west of the canyon rim are nationally significant, BLM should reduce the boundary of the ACEC to only the canyon rims.</p>	<p>comment have been analyzed for each of the alternatives in the Final EIS.</p> <p>The Final EIS includes the decisions required for each program and BLM will attempt to ensure that the allowable uses and allocations are compatible and meet the objectives of the selected plan.</p> <p>The balance is within the range of alternatives as some alternatives proposed designation and others do not. Also size and management prescriptions vary between the alternatives. If the protection of the relevant and importance values "outweighs" the other resource uses then the ACEC was proposed under all the alternatives. Through FLPMA, BLM has authority to designate ACECs where special management attention is required to protect and prevent irreparable damage to important cultural, historic, or scenic values; fish and wildlife resources; or other natural systems or processes or to protect life and safety from natural hazards. Where ACEC values and wilderness characteristics coincide, the special management associated with an ACEC, if designated, may also protect "wilderness characteristics: (IM-2003-275). However, BLM policy directs that "an ACEC designation will not be used as a substitute for wilderness suitability recommendations: (BLM-M-16513). Wilderness characteristics were not considered relevant or important values when</p>

**Table 5.13y. Comments Requiring a Change in the Document: Wilderness Characteristics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					<p>evaluating or designing management for potential ACECs.</p> <p>On August 27, 1980, BLM promulgated final ACEC guidelines (45 Federal Register 57318) that clarify that the term "protects" means: "To defend or guard against damage or loss to the important environmental resources of a potential or designated ACEC. This includes damage that can be restored over time and that which is irreparable. With regard to a natural hazard, protect means to prevent the loss of life or injury to people, or loss or damage to property."</p> <p>Thus, BLM is to consider the potential for both reparable and irreparable damage when protecting important historic, cultural, or scenic values; fish and wildlife resources; or other natural systems through ACEC designation. This interpretation is consistent with FLPMA's legislative history and implementing policy. Section 2 of the guidelines clarifies that ACECs are special places within public lands. It states:</p> <p>"In addition to establishing in law such basic protective management policies that apply to all the public lands, Congress has said that 'management of national resource lands [public lands] is to include giving special attention to the protection of ACECs, for the purpose of ensuring that the most environmentally important and fragile lands will be given early attention and protection' (Senate Report 94-583, on FLPMA). Thus, the ACEC process is to be used to provide</p>

**Table 5.13y. Comments Requiring a Change in the Document: Wilderness Characteristics**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
					<p>whatever special management is required to protect those environmental resources that are most important, i.e., those resources that make certain specific areas special places, endowed by nature or man with characteristics that set them apart. In addition, the ACEC process is to be used to protect human life and property from natural hazards."</p> <p>Relevance and Importance criteria have been expanded in the final EIS.</p> <p>Please see Response to ID No. G-144-Comment 1.</p>
WSA Supplement	Duchesne County Commission	G-10	47	Cold Springs Mountain: 8,764 acres vs. 8,674?	8,764 is the correct acreage. BLM will make the correction in the Final RMP.
WSA Supplement	Duchesne County Commission	G-10	60	Page 4-219, Section 4.22, 2nd paragraph on this page: The list of other land management agencies in this paragraph fails to mention SITLA, which owns many sections of land abutting non-WSA lands managed by the BLM.	<p>Comment Noted.</p> <p>SITLA will be added.</p>

**Table 5.13z. Comments Requiring a Change in the Document: Woodlands**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
WSA Supplement	Duchesne County Commission	G-10	35	Pages 4-118 and 4-119, Section 4.17.2.12.5: The 1st paragraph of this section notes that woodland salvage and harvesting would be prohibited under Alternative E. However, in the second paragraph, it gives the impression that woodland salvage and harvesting would be allowed. This apparent inconsistency should be clarified.	<p>Section 4.20.1-Impacts Common to the Proposed RMP and all Alternatives, states: "Woodland resources would be treated or harvested under the Proposed RMP and all of the alternatives; however, under the Proposed RMP and Alternative E, non-WSA lands with wilderness characteristics would be managed with prohibitions on woodland and timber harvesting and salvage. These prohibitions would have adverse impacts on harvesting opportunities in the long term.</p> <p>The section has been revised in the Proposed RMP/Final EIS. The section number has been changed to Section 4.20.2.9-Alternative E.</p>

**Table 5.14aa. Comments Requiring a Change in the Document: Wild Horses and Burros**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	WH28	The analysis of wild horse impacts on wildlife and fisheries on page 4-324 is incomplete and does not address long-term impacts by wild horses on sagebrush steppe vegetation communities and existing riparian areas. The Utah DWR indicates that significant overgrazing of browse (needed by mule deer) occurs annually, especially around water collection	<p>The potential impacts of wild horse management decisions on vegetation are analyzed in Section 4.16.2.14.</p> <p>The analysis of potential impacts of wild horse management decisions on wildlife contained in Section 4.19.2.13 has been expanded for the</p>

Table 5.14aa. Comments Requiring a Change in the Document: Wild Horses and Burros

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				ponds, in other areas of wild horse herds. Estimates of the effects of the Ute Tribal wild horses in Agency Draw indicate that a minimum of a 0.5-mile radius on browse damage can be seen around watering sites	PRMP/FEIS.
Draft RMP/EIS	State of Utah	G-1	WH31	State of Utah (DWR) biologists have documented heavy summer and winter use of Winter Ridge by elk. This use has created competition for forage between the elk and the livestock permittee. This impacts of wild horses on available forage in light of this existing competition needs to be analyzed further in the DEIS.	Analysis of impacts from competition for forage between elk, livestock, and wild horses has been added in the PRMP/FEIS.
Draft RMP/EIS	UBAOG	G-22	WH14	Strike this entire alternative. This alternative says the permits would be offered on the former HMA of Hill Creek. Neither the text nor maps indicate where this is. Issuing this permit would only add to the management problems in the HMA.	Only Alternative B would authorize permits for wild horse grazing in the Hill Creek HA, and these permits would only be issued to the Northern Ute Tribe. Figure 33 has been revised to show the Hill Creek Herd Area in question.
Draft RMP/EIS	UBAOG	G-22	WH5	After 1st sentence use would be allowed within allocations made in the land-use plan, and overall herd numbers would be confined to management limits established as an appropriate management level. Add:  "BLM would remove wild horses when appropriate management levels are exceeded or when wild horses are found outside the herd management areas."  The RMP needs to commit to removal and	Table 2.1.1 (Management Common to All Alternatives) of the PRMP under the subsection entitled Fire, Drought, and natural Disasters has been revised to read as follows:  "Wild or feral horses will be gathered and removed. Forage allocation has been allocated until removal."

Table 5.14aa. Comments Requiring a Change in the Document: Wild Horses and Burros

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				active management of wild horses.	
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	WH68 (R-WH17)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"If forage allocation reductions are necessary to maintain, meet or make significant progress towards or sustain rangeland health in the Bonanza, Diamond Mountain, Book Cliffs (excluding wild horse herd areas), and Blue Mountain localities or the Bonanza Wild Horse Herd Area, AUMs allocated to big game and wild horses would be reduced proportionately to the role they play with those allocated to livestock. If reductions are necessary in the Hill Creek and Winter Ridge Wild Horse Herd Areas big game and wild horses would be reduced proportionally with AUMs allocated to livestock and wild horses. However, AUMs allocated to pronghorn would not be reduced below 502 AUMs in the Bonanza locality and 239 AUMs in the Bonanza Wild Horse Herd Area locality unless antelope numbers have played a role in the area not meeting rangeland health standards. ... Reductions in forage allocation for wildlife in the Bonanza, Book Cliffs, and Blue Mountain localities would not be specified under the No Action Alternative. There would be no reductions in forage allocation for wildlife in the Diamond Mountain locality on crucial habitat; on non-crucial habitat, allocations would be reduced equally with livestock under the No Action Alternative.</p>	<p>Section 4.19.2.3.1 of the PRMP/FEIS has been revised as follows:</p> <p>"Under Alternative A, if forage allocation reductions are necessary to maintain, meet or make significant progress towards rangeland health in the Bonanza locality AUMs allocated to live stock and pronghorn would be reduced proportionally though pronghorn use would not be reduced below 502 AUMs. Alternative A would be more beneficial to wildlife than Alternative D since Alternative A specifies necessary actions when the aforementioned criteria are met.</p> <p>If, however, additional forage is available forage increases would be divided proportionately between livestock and big game with the wildlife AUMs going to pronghorn and deer. In this case, the impacts of Alternatives A and D are approximately the same since both alternatives would provide additional forage for wildlife."</p>

**Table 5.14aa. Comments Requiring a Change in the Document: Wild Horses and Burros**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment

**Table 5.14bb. Comments Requiring a Change in the Document: Wildlife**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	WF87	The fish and wildlife resources section 3.19 begins on page 3-123. Multiple tables within this section confuse the herd unit numbers for Bonanza and Diamond Mountain sub-units. The Bonanza sub-unit number is 9d and Diamond Mountain is 9c. This discrepancy should be changed in tables 3.19.1, 3.19.3, and 3.19.5. In addition, table 3.19.2 appears to be incomplete for mule deer habitat in the VPA.	Table 3.19.2 in the PRMP/FEIS text has been revised to correct and clarify the herd unit numbers and to complete the description of mule deer habitat.
Draft RMP/EIS	State of Utah	G-1	WF88	Table 3.19.3 outlines management goals for mule deer. Some of the population objectives and buck-to-doe ratios are incorrect. The combined mule deer population objective for the South Slope Vernal, Diamond, and Bonanza sub-units is 13,000. The buck-to-doe ratio for South Slope Diamond Mountain (9c) and Book Cliffs Bitter Creek and Little Creek (10a) is 25-30:100. Table 3.19.5 outlines management	Table 3.19.3 used 2002 goals for purposes of analysis of the Draft RMP. Updated goals may be found at the UDWR web site. The PRMP/FEIS text has been revised to correct the errors.

Table 5.14bb. Comments Requiring a Change in the Document: Wildlife

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				goals for elk in the VPA. The listed bull age ratios are incorrect. The North Slope (Summit and West Daggett), North Slope Three Corners, South Slope Yellowstone, South Slope Vernal, and South Slope Bonanza sub-units are managed for 50% of bulls 2½ years or older. The South Slope Diamond sub-unit (9c) is managed for bulls 3-4 years old. The Book Cliffs (Bitter Creek and Little Creek) and Nine Mile Anthro sub-units are managed for 5-6 year old bulls. Utah's statewide herd management plans for mule deer, elk, and other species should be referenced and discussed in section 3.19.	
Draft RMP/EIS	State of Utah	G-1	WF89	Section 3.19.1.3 discusses pronghorn in the VPA. This section displays population estimates for several herd units. The data referenced are not population estimates, but rather annual trend count numbers. These numbers are used for population trend and do not reflect population sizes. The section does not offer trend count data for the Book Cliffs and Nine Mile pronghorn herd units. Trend data for these units can be obtained by contacting the UDWR Vernal office at 435-781-6707.	Section 3.19.1.3 in the PRMP/FEIS text has been revised, and trend count data added to the section.
Draft RMP/EIS	State of Utah	G-1	WF90	Bighorn sheep are discussed on page 3-127. The UDWR is unaware of any large bighorn sheep populations in the Nine-Mile Canyon area. The UDWR manages bighorn sheep populations in Desolation Canyon and on Range Creek, both of which are outside the VFO. The Ute Tribe has bighorn sheep	Section 3.19.1.4 in the PRMP/FEIS text has been revised to remove the reference to a sheep population within Nine-Mile Canyon. Bighorn sheep are in the UDWR Nine Mile Unit (#11), which is outside of the VPA.

**Table 5.14bb. Comments Requiring a Change in the Document: Wildlife**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				populations in Desolation Canyon and in Hill Creek.	
Draft RMP/EIS	State of Utah	G-1	WF91	Moose populations are outlined in section 3.19.1.5. This section does not mention that moose populations also occur in the North Slope wildlife management unit and does not offer population estimates for that unit.	Section 3.19.1.5 in the PRMP/FEIS has been revised to include moose population information for the North Slope wildlife management unit.
Draft RMP/EIS	State of Utah	G-1	WF92	Section 3.19.1.10 should include Brown's Park and Mallard Springs WMAs as additional important waterfowl and shorebird areas in the VFO.	Section 3.19.1.10 in the EIS text has been revised to include these areas as important to waterfowl.
Draft RMP/EIS	State of Utah	G-1	WF93	Desert and mountain cottontails should be removed from section 3.19.1.12. Cottontail rabbits are managed by the UDWR as upland game species.	The PRMP/FEIS has been revised to move the cottontail information from Section 3.19.1.12 (Non-Game Species) to Section 3.19.1.9 (Upland Species).
Draft RMP/EIS	State of Utah	G-1	WF94	Page 3-133 outlines habitat fragmentation concerns. The section cites a study on mule deer conducted in the Book Cliffs. This study was a four-year inventory (1998-2002), rather than two years as listed in the RMP. The UDWR initially recommended the study continue for five total years, however sufficient data were collected by the fourth year to meet the study objective. More information on fragmentation of mule deer habitat can be found in the study "Mule Deer Conservation: Issues and Management Strategies" by Vos, Conover, and Headrick (2003).	Section 4.19.2 in the PRMP/FEIS has been revised to show that the inventory length was four years.
Draft RMP/EIS	State of Utah	G-1	WF96	Section 4.19 on page 4-305 should include an additional impact of grazing management decisions on wildlife. Livestock grazing in critical	Section 4.19 in the PRMP/FEIS has been revised to include an analysis of the impacts of livestock and grazing management actions on

Table 5.14bb. Comments Requiring a Change in the Document: Wildlife

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				big game winter ranges, riparian areas, and sage-grouse areas has the potential to impact wildlife by changing vegetation composition and structure. These impacts are real and should be analyzed in the RMP.	wildlife.
Draft RMP/EIS	State of Utah	G-1	WF97	The RMP confuses UDWR GIS data and Utah GAP Analysis data in section 4.19.2.5.2.1 on page 4-314 and in section 4.19.2.5.2.2 on page 4-316. Utah State University developed GAP Analysis projected habitat occurrence data for several wildlife species during the mid-1990s. The UDWR GIS database includes, in part, habitat value designations as well as season of use designations for big game and other managed wildlife species	Sections 4.19.2.5.2.1 and 4.19.2.5.2.2 in the PRMP/FEIS text have been revised to clarify the use of UDWR GIS data and Utah GAP analysis data.
Draft RMP/EIS	State of Utah	G-1	WF98	The UDWR recommends that the RMP further address cumulative impacts in both the special status species section (4.22.9) and the wildlife and fisheries section (4.22.12). The RMP should provide more information regarding past activities and projected future activities in the Uintah Basin and the combined impacts these actions may have on wildlife populations.	Sections 4.22.10 (special status species) and 4.22.12 (wildlife and fisheries) in the PRMP/FEIS have been revised to provide more information on cumulative effects.
Draft RMP/EIS	State of Utah	G-1	WF99	The UDWR notes that the sage-grouse lek buffers subject to timing and controlled use on figure 11, figure 12, and figure 13 may be incorrect. USU completed a resource assessment for BLM and documented leks, winter use areas, and other grouse observations. The data displayed on figure 11 appear to represent all data points USU collected, many of which are not actual lek	Figures 11-13 in the PRMP/FEIS have been revised to correct sage grouse lek buffers.

Table 5.14bb. Comments Requiring a Change in the Document: Wildlife

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				locations. This discrepancy occurred on the sage-grouse lek map BLM had in the administrative draft RMP and appears not to have been corrected. The UDWR maintains the most up-to-date database for sage-grouse leks and those data should be used for the RMP.	
Draft RMP/EIS	Duchesne County	G-9	WF35	This conclusion does not appear to be adequately supported by findings in the chapter and is an overstatement of the potential impacts.	Section 4.15.6 in the PRMP/FEIS has been revised to include supporting statements for the conclusion reached in this section.
Draft RMP/EIS	Duchesne County	G-9	WF36	Efforts have not been made in Alternative B to allocate forage to wild horses.	The commenter is correct. Alternative B represents part of the range of alternatives by CEQ regulations (40 CFR 1502.1).
Draft RMP/EIS	Duchesne County	G-9	WF54	Alt B does not include the 560 acres per township limitation for wildlife, according to Table 2.3 on pg 2-65. Alts A and C contain this limitation, while Alt B has a 10% habitat threshold. Duchesne Co. supports Alt B and the 10% threshold.	Section 4.16.2.15.1 in the PRMP/FEIS has been revised to correct the analysis error for Alternative B.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	WF144 (JWF-34)	We commend the BLM for the commitment to "pursue a partnership between industries, local governments, USFWS, UDWR, BLM, and others to establish a raptor management fund to be utilized for raptor population monitoring and habitat enhancement." We recommend you also include, at a minimum, the Forest Service and NRCS. We offer our assistance in establishing this partnership.	Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to include the USFS and NRCS.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	WF147 (JWF-37)	1st sentence: All the raptor species found in the VPA are federally protected under the Migratory Bird Treaty Act. We recommend you reword the	Section 3.19.1.11 In the PRMP/FEIS text has been revised to include a reference to protection of raptors under the Migratory Bird

Table 5.14bb. Comments Requiring a Change in the Document: Wildlife

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				sentence to reflect that all have federal protection and several have additional state protection.	Treaty Act.
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	WF148 (JWF-38)	2" paragraph: The BLM proposes employment of a raptor database using information from an ongoing study, which intends to determine the nesting requirements and seasonally important rapt or habitats located on public lands within the VPA. Using this database to track nest sites and important raptor habitat location, the document outlines the next step: "oil and gas development maps will be used to develop predictive models for raptor/energy conflicts, and to develop mitigation measures for unleased parcels." We believe this approach, as proposed, will fail to protect raptors because: 1) the utility of the ongoing study has yet to be determined, and it may not provide the level of information necessary, and 2) virtually all the habitat for the most sensitive raptor species in the VPA has already been leased for development, so there will be few acres with mitigation applied.	Section 3.19.1.11 in the PRMP/FEIS has been revised to the delete the following sentence:  "Oil and gas development maps will be used to develop predicted models for raptor/energy development conflicts, and to develop mitigation measures for unleased parcels."
Draft RMP/EIS	U.S. Fish and Wildlife Service	G-12	WF152 (JWF-41)	The discussion of Cumulative Impacts on Wildlife and Fisheries does not detail what the overall impact will be from all resource decisions on wildlife and fisheries. The section is copied from two paragraphs in the Special Status Species cumulative impacts section, but there is no further determination of what the impact would be to fish and wildlife resources.	Section 4.22.12 in the PRMP/FEIS has been be revised to include a more comprehensive analysis of cumulative impacts on wildlife and fisheries.
Draft	UBAOG	G-22	WF21	There is no indication of the type of disturbance	Alternative A in Table 2.1.26 (Wildlife and

Table 5.14bb. Comments Requiring a Change in the Document: Wildlife

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS				that is to be reclaimed. One assumption would be surface disturbance if so. There is nothing in the text to support the need for 1.5:1 mitigation ratio. It must not be based on habitat loss as such habitat should be avoided to the extent possible. When area disturbance is located outside sage brush habitat when reclamation is complete often habitat is created or forage plants are established where they did not exist prior. This issue has been one of long-time contention. The 1.5:1 ratio is the result of a negotiation that began with a 3:1 ratio and bargained down. The bottom line is that reclamation should be based on the amount of habitat lost. The goals expressed in CHS, to double and triple mule deer and elk populations would appear to be a driving force behind forced increases in habitat.	Fisheries Resources) of the PRMP/FEIS has been revised to reflect a 1:1.5 ratio.
Draft RMP/EIS	UBAOG	G-22	WF3	There should be a clear distinction between introduction, reintroduction and emigration. Glossary should provide a definition of each. Emigration should not be handled as a reintroduction. The Uintah County Plan provides that animals outside of their permitted area are in trespass. Such animals should be removed. To allow emigration requires planning and forage adjustments after the fact and is not sound management. Emigration requires the same analysis and disclosure as do other decisions.	The Glossary of the Final EIS has been revised to clarify the meaning of "introduction," "reintroduction," and "emigration."  The commenter was not clear in defining what "permitted area" means.
Draft RMP/EIS	UBAOG	G-22	WF31	Strike "would" in the first sentence. Replace with - "may".	Table 2.3 in the Final EIS has been revised with the suggested changes.

Table 5.14bb. Comments Requiring a Change in the Document: Wildlife

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				Not all reintroduction efforts will uniformly benefit wildlife habitat. For example, increased prairie dog populations to support the black-footed ferret will have significant and adverse impacts on rangeland vegetation. While this is justified under the ESA, the RMP cannot ignore the damage done and resulting increase in sediment and erosion, loss of native vegetation, etc.	
Draft RMP/EIS	UBAOG	G-22	WF34	The DEIS does not define and appears to misuse the term "habitat fragmentation." The discussion incorrectly states that agriculture uses fragment habitat. Agriculture in the planning area is primarily ranching and it does not "fragment habitat." Second, the alleged fragmentation is probably due to private land ownership along water bodies. Unless the land uses prevent life processes, it is inaccurate to describe the habitat as fragmented. Moreover, fragmentation means different things to different species and the broad-brush discussion incorrectly assumes that habitat changes have an equal effect.	The Section 3.19.2 in the PRMP/FEIS has been revised to include a definition for habitat fragmentation. Otherwise, the commenter does not provide any additional information to substantiate or support the assertions made concerning habitat fragmentation within the VPA.
Draft RMP/EIS	UBAOG	G-22	WF35	This conclusion does not appear to be adequately supported by findings in the chapter and is an overstatement of the potential impacts.	Section 4.15.6 in the PRMP/FEIS has been revised to include supporting statements for the conclusion reached in this section.
Draft RMP/EIS	UBAOG	G-22	WF36	Efforts have not been made in Alternative B to allocate forage to wild horses.	The commenter is correct. Alternative B represents part of the range of alternatives by CEQ regulations (40 CFR 1502.1).

Table 5.14bb. Comments Requiring a Change in the Document: Wildlife

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	UBAOG	G-22	WF8	<p>"During periods of prolonged dryness or drought, to the extent that wildlife grazing ungulate populations cannot be sustained due to competition for water and available forage, and overall animal health is compromised. BLM would enter into discussions with the Utah Division of Wildlife Resources (UDWR) regarding herd numbers and overall management options to combat the effects of drought."</p> <p>Remove "and overall animal health is compromised."</p> <p>Remove "combat" on last line and add "ensure that rangeland health is maintained and to address."</p>	Table 2.1.1 (Management Common to All Alternatives under the subsection entitled Fire, Drought, and Natural Disasters has been revised to incorporate the suggested changes.
Draft RMP/EIS	Laird Fetzer Hamblin	I-169	WF132 (JWF-22)	EIS states that in the VPA there are 15 species of plants and animals federally listed as T&E and 1 candidate species. EIS states that there are 28 species considered by Utah to as sensitive to becoming endangered. Both of these lists are incomplete for the federal and state species documented to or expected to exist in the VPA.	<p>At the time of Draft RMP publication, the listing of federal and state special status species was complete, based on information obtained from the USFWS and Utah DWR.</p> <p>The Final EIS has been updated to include the latest and most current T&amp;E and special status species designations.</p>
Draft RMP/EIS	Laird Fetzer Hamblin	I-171	WF118 (JWF-8)	A small population of mountain plovers on Myton Beach is in need of special protection. Any use of the area that directly or indirectly affects the plovers or their habitat should be avoided. This study shows a steady decline in numbers. Evaluation of the condition of habitat	<p>Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to read as follows:</p> <p>"Manage non-listed sensitive species and the habitats upon which they depend in such a</p>

Table 5.14bb. Comments Requiring a Change in the Document: Wildlife

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				there should be undertaken immediately. May be due to increase in oil and gas production. Livestock grazing should be discontinued in on Myton Beach.	manner as to preclude the need to list them as either threatened or endangered under the Endangered Species Act. The guidance for this management is put forth in the BLM 6840 Manual."
Draft RMP/EIS	IPAMS	O-14	WF155 (LWF-3)	The restriction on operations in sage grouse habitats is inconsistent in Appendix K and the timing restrictions. Add 'active lek' to restrictions.	Appendix K in the PRMP/FEIS has been revised to correct the inconsistencies.
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	WF190 (R-WF16)	-Alternative A, Alternative D The RMP does not define surface disturbance. If the term is defined as the actual construction of a road, where vegetation is removed and soil is mixed or removed, this may be reasonable. If the term is used to apply to any activity that scuffs dirt, then it is unreasonable. The RMP fails to document the scientific basis for prohibiting surface-disturbing activities along migration corridors.	The EIS text has been revised to include the definition of surface disturbance, in the context of the wildlife and fisheries management actions.
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	WF194 A (R-WF20)	The term surface-disturbing needs to be defined as recommended on page 5 of these comments. EPCA, Executive Orders and BLM Policy require more detailed analysis and documentation than what is found in the draft RMP with respect to wildlife management conditions and the imposition of overlapping conditions. This standard needs to be limited to surface-disturbing activities and to only apply to significant impacts. The RMP must ensure that restrictions have a scientific basis. For example, it is shown that big game become accustomed to incidental uses of a road by motor vehicles or	The Glossary of the PRMP/FEIS has been revised to include the definition of surface disturbance, in the context of the wildlife and fisheries management actions.

**Table 5.14bb. Comments Requiring a Change in the Document: Wildlife**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				even drilling in the distance. If the activity involves 6 acres out of 18,000 acres it is not a significant activity.	
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	WF199 A (R-WF25)	-Alternative D If Alternative D is the same as A, the conclusion makes no sense.	The comparison of Alternatives A and D are made within the context of designating SRMAs and byways. As stated in Section 4.19.2.7, the long-term impacts on wildlife and fisheries populations (both beneficial and adverse) would be similar for Alternatives A and D. The EIS text has been revised to state that the impacts under Alternative D would be "similar" to Alternative A (as it is stated in Section 4.19.2.7).
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	WF202 (R-WF28)	The RMP discussion should also address changes in big game and wildlife populations and trends. Elk numbers, for example, in this region are reportedly increasing and this upward trend will continue for the next decade. If UDWR has increased its herd objectives that fact is also relevant to the issue of where rangeland conditions are not maintaining or achieving rangeland health standards and the contributing factors.	Section 3.19 in the EIS text has been revised and trend count data added to the section.
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	WF207 (R-WF33)	Add the following statement at the top of the table:  These range improvements are only projected and are not a ceiling.	Table 4.19.8 in the PRMP/FEIS has been revised to add language as suggested for clarification purposes.

Table 5.14cc. Comments Requiring a Change in the Document: Water Resources

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	SW20	The paragraph at the top of page 2-28 states that the BLM will "Develop additional and maintain existing water rights." We would appreciate more detail and specifics on this statement.	<p>The Bureau has need for water rights for present and future use. These may include livestock, wildlife, public use, or conservation.</p> <p>Table 2.1.17 (Soil and Water Resources) of the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives has been revised to clarify the statement as follows:</p> <p>"BLM implements multiple types of water uses on public lands that require water rights from the State of Utah, such as livestock watering, wildlife watering and habitat, wild horse watering, recreation facilities, and fire suppression. BLM will continue to implement actions to maintain its current water rights for these purposes, such as filing proofs of beneficial use, filing diligence claims, changing existing water rights to fit new uses and projects, and filing protests as necessary to protect existing BLM water rights. BLM will also file for new water rights in accordance with and when allowed under state water law procedures. Situations in which BLM will file for new water rights include locations where existing water rights are insufficient or not in place to support the water use, or when existing water rights cannot be changed to support the water use on public land."</p>
Draft RMP/EIS	USFS—Ashley	G-19	SW47 (LSW-5)	Mention the directives for floodplains under EO 11988.	Executive Order No. 11988; Floodplain Management; May 24, 1977 has been added to

Table 5.14cc. Comments Requiring a Change in the Document: Water Resources

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
	National Forest				the References in the PRMP/FEIS.
Draft RMP/EIS	USFS—Ashley National Forest	G-19	SW49 (LSW-7)	Clarify how the aquifers described in the RMP mesh with those mapped by the USGS and Ashley NF.	Information has been added to Section 3.13.4.2 denoting the relationship between the aquifers described in the RMP and those mapped by the USGS and Ashley National Forest to the extent that such information is available.
Draft RMP/EIS	UBAOG	G-22	GC21	What is the definition of "active flood plains"?	The glossary in the Final EIS has been revised to include a definition of "active flood plain" to the existing definition of Flood Plan.
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	SW58 (R-SW1)	<p>Add the bolded statement where indicated:</p> <p>"Eliminate or reduce discharge of pollutants into surface waters and achieve water quality that provides protection and propagation of fish, amphibians, wildlife, livestock, and recreation in and on the water. Implement best management practices adopted by Utah Division of Environmental Quality ("DEQ") to limit surface discharges into water."</p> <p>The Utah DEQ has jurisdiction over water quality, both point and non-point sources of water pollution. BLM's only regulatory option is to implement the "best management practices" for non-point sources, which are designed to reduce sedimentation and erosion into streams.</p>	The suggested wording has been added to Table 2.1.17 ((Soil and Water Resources) in order to clarify that the BLM acknowledges the authority of and adheres to the regulations of the DEQ (and the EPA) under all alternatives.
Draft RMP/EIS	Vermillion Ranch Limited Partnership	O-33	SW64 (R-SW7)	Any CBNG water disposal is governed by Utah DEQ. The other effects are accidental spills or unlawful actions that presumably are prevented through enforcement procedures. Disposal by	Section 4.7.2.3.2 does not claim that disposal is accidental as suggested by the comment. The statement in this section merely refers to disposal as a potential source of additional

**Table 5.14cc. Comments Requiring a Change in the Document: Water Resources**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				definition is not accidental.	unquantified adverse impacts. However, the reference to accidental spills has been removed from the text, as accidental spills are tied to unplanned actions.

**Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	SD56	The discussions concerning potential recommendations for addition to the Wild and Scenic River System in the draft RMP and EIS are confusing, contradictory and incomplete, and do not meet the requirements of federal or state law or BLM policy and direction. The counties believe it is imperative that the BLM properly disclose the reasons and rationale for determinations of eligibility and suitability for proposed additions to the NWSRS, and to fully meet the requirements of state and federal law in doing so.	Appendix C of the EIS has been revised to include additional information regarding the BLM's eligibility and suitability analysis and determinations.
Draft RMP/EIS	State of Utah	G-1	SD63	The draft RMP indicates on page 2-29 that "new river segments found suitable" would be managed in accordance with the "Wild and Scenic River Act to prevent non-impairment of outstandingly remarkable values." We do not find the term "non-impairment" in either the Act or BLM policy direction. The Wild and Scenic	Actions Common to all for Wild and Scenic Rivers have been moved to Table 2.1.19 (Special Designations – Wild and Scenic Rivers) of the PRMP/FEIS. The Actions Common to All have been revised to more clearly define how BLM intends to manage segments determined suitable as a result of this

Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				Rivers guidelines of federal agencies indicate that Section 10(a) of the Act is interpreted to provide for a "nondegradation and enhancement policy for all designated river areas." However, this provision does not apply to rivers found suitable for recommendation during planning processes. The counties are concerned the statement of management found on page 2-29 is too simplistic, doesn't meet the intent of the statements found on page 3-84 or page 4-210, and fails to give the stakeholders or the public sufficient notice of criteria or process the BLM intends to employ as part of the proposed management for the river segments determined to be suitable for inclusion in the NWSRS. We request that the BLM revise the document to address these concerns.	planning process. The correct phrasing should be "prevent impairment" instead of "prevent non-impairment."
Draft RMP/EIS	State of Utah	G-1	SD66	Table 5 includes "[m]anageability of the river if designated, and other means of protecting values" as a "Suitability Consideration." However, in the "Consideration Applied" column which is supposed to provide the information about manageability, the document simply states "[m]anageability ... and other means of protecting values would be extrapolated from the impact analysis for the Vernal RMP/EIS." This analysis goes nowhere as an explanation, and is inadequate to meet the requirements of Federal law and BLM Manual 8351, and further, is not supported by the impact analysis information presented on pages 4-210 through 4-215.	Appendix C of the EIS has been revised to include additional information regarding the BLM's eligibility and suitability analysis and determinations.

**Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	State of Utah	G-1	SD67	<p>The draft RMP provides only cursory acknowledgment of the White River Dam project and fails to adequately represent its significance, and characterizes the impacts of an eligibility or suitability determination, and associated "protective management" on the proposed project in a contradictory manner. Statements found on pages 4-212 and 4-213 illustrate the cursory analysis, as follows: "...a suitable decision for Segment 1 of the White River would be incompatible with the continuation of an existing permit for a dam site" and t]he suitability decision for Segment 1 of the White River would result in the discontinuance of the existing permit for the dam site." The White River is also described as part of Alternative D, on page 2-57, as follows: "[u]nder this alternative, suitability findings would not be made and eligibility would continue with BLM applying protective management to the free flowing nature, outstandingly remarkable values, and tentative classification of the river." The discussion of Alternative D on page 4-214, reaffirms that Segment 1 of the White River "would remain eligible." However, in a contradictory manner, the discussion also states, "Segment 1 has been identified for a potential dam site." Subsequently, the last paragraph on page 4-214 concludes the description of Alternative D, as follows: "Under this alternative, the continued eligibility decision for Segment 1 of the White River would be incompatible with</p>	<p>Alternatives B and D are part of the range of alternatives. There is an existing right of way for a dam on the White River in segment 1. Segment 1 was carried forward for analysis purposes under the wild and scenic river situation.</p> <p>Also, see Response to Comment SD8-G-9.</p>

Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				continuance of the existing permit for the dam site. Because this permit would continue under this alternative, the free-flowing nature of Segment 1 would not be maintained and this segment would no longer be eligible as a Wild and Scenic River." Further, Appendix C, Wild and Scenic River Eligibility, Suitability, Classification and Review does not include any information regarding the White River Dam Project.	
Draft RMP/EIS	State of Utah	G-1	SD69	The discussion of Alternative B on page 4-213 includes the following statement, "If acquired lands along Nine Mile Creek are grazed, the outstandingly remarkable cultural and scenic values would be more at risk than with Alternatives A and C". Unfortunately, nowhere in the draft RMP and EIS is there other mention of this apparent concern, or other information that would enable the reviewer to grasp its relative significance. We strongly object to this unsupported assertion that grazing threatens the ORVs in the area, especially on lands that may be acquired. Grazing can be managed to protect cultural and riparian values. The BLM needs to carefully explain the potential difficulties of this area, and analyze them in terms of proper mitigation, rather than making unsupported blanket statements such as this. In addition, the discussion of Alternative A at pages 4-211 and 4-212, contains no reference to any "acquired lands along Nine Mile Creek."	Chapter 4 of the PRMP/FEIS has been revised to correct and clarify the apparent contradiction.
Draft	State of	G-1	SD70	As a matter of clarification, the document, at	Table S.3 of the Executive Summary in the

**Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
RMP/EIS	Utah			page S-3, refers to sections of rivers, ranging from one to six rivers, which are recommended for Wild and Scenic River designation. Throughout the remainder of the document, the discussion of wild and scenic rivers refers to segments of rivers, rather than separate individual rivers. The confusion is immediately apparent when the reader looks to Table S.3, as directed by the text on page S-3. Clarity could be achieved by indicating the number of segments associated with the rivers, i.e., "Alternative C ... recommends 9 segments of six rivers."	PRMP/FEIS has been corrected and the issue clarified regarding the number of rivers and river segments.
Draft RMP/EIS	State of Utah	G-1	SD71	The information at page 2-29 does not fully characterize proposed interim management of WSRs, because the discussion of management of eligible segments, found at page 3-84, is not presented here. We recommend that information similar to that found at page 3-84 be included at page 2-29.	Chapter 2 of the PRMP/FEIS has been revised to be consistent with the information found in Section 3.14.3.2 regarding WSRs.
Draft RMP/EIS	Duchesne County	G-9	SD240 (SD-JJJ)	1st paragraph: It states that, under Alternative A, the upper and lower segments of the Green River would be determined suitable for WSR status. However, on pg. 4-212 and 4-214, it implies that these Green River segments have already been determined to be suitable. Has suitability been determined for these segments; and if so, when?	Chapter 4 in the PRMP/FEIS has been revised to clarify the status of WSR river segments under Alternative A.
Draft RMP/EIS	Uintah, Daggett, and Duchesne	G-23	SD45	The Wild and Scenic River Review in Utah, process and criteria for interagency use pages 2 and 3, suitability states "The purpose of the suitability component is to determine whether	Appendix C in the PRMP/FEIS has been revised to include additional information regarding suitability determinations.

Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
	Counties			eligible rivers are appropriate additions to the national system by considering trade-offs between corridor development and river protection." It further states "suitability considerations include the environmental and economic consequences of designation and the manageability of the river if it is designated." Appendix E lists suitability factors to be considered in analysis. This analysis required for determination of suitability has not been accomplished in this DEIS/RMP nor in previous analysis of suitability. BLM has relied on faulty analysis that is 25 years old.	
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-24	SD88	In Alternative A, sections of Nine Mile Creek are proposed not to be identified as suitable for inclusion in the Wild & Scenic River System. There appears to be an error in the description of the first section discussed. Nine Mile Creek between the Green River and the Duchesne County line is not in Duchesne County. The outstanding ORVs identified for this section are not dependent on the river for their existence and not directly river-related as required in IM 2004-196. There is lack of detailed analysis of the need for a WSR designation, how the ORVs meet the above analysis, what management prescription will be applied and impacts on current development leases or permits. Alternative A is the only acceptable alternative, as lack of analysis, location and need to protect the ORV fail to support designation. The ORVs used to support designation have other laws or regulations to protect them or are currently	<p>The statements in question should reference the portion of Nine Mile Creek in Duchesne and Uintah counties, from the Green River to the Duchesne-Carbon County Line. Under Alternatives C and E the river segment would be found suitable for inclusion in the NWSRS.</p> <p>Chapter 2 in the PRMP/FEIS has been revised to clarify that suitable rivers/river corridors will be managed to protect their outstandingly remarkable values, tentative classifications, and free-flowing nature. Specific resource allocations and management prescriptions within and outside of eligible river corridors are shown on alternative maps, whether or not such information is described in the wild and scenic river section of Chapter 2.</p>

Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				protected.	
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	SD56	The discussions concerning potential recommendations for addition to the Wild and Scenic River System in the draft RMP and EIS are confusing, contradictory and incomplete, and do not meet the requirements of federal or state law or BLM policy and direction. The counties believe it is imperative that the BLM properly disclose the reasons and rationale for determinations of eligibility and suitability for proposed additions to the NWSRS, and to fully meet the requirements of state and federal law in doing so.	Appendix C of the EIS has been revised to include additional information regarding the BLM's eligibility and suitability analysis and determinations.
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	SD63	The draft RMP indicates on page 2-29 that "new river segments found suitable" would be managed in accordance with the "Wild and Scenic River Act to prevent non-impairment of outstandingly remarkable values." We do not find the term "non-impairment" in either the Act or BLM policy direction. The Wild and Scenic Rivers guidelines of federal agencies indicate that Section 10(a) of the Act is interpreted to provide for a "nondegradation and enhancement policy for all designated river areas." However, this provision does not apply to rivers found suitable for recommendation during planning processes. The counties are concerned the statement of management found on page 2-29 is too simplistic, doesn't meet the intent of the statements found on page 3-84 or page 4-210, and fails to give the stakeholders or the public sufficient notice of criteria or	Actions Common to all for Wild and Scenic Rivers have been moved to Table 2.1.19 (Special Designations – Wild and Scenic Rivers) of the PRMP/FEIS. The Actions Common to All have been revised to more clearly define how BLM intends to manage segments determined suitable as a result of this planning process. The correct phrasing should be "prevent impairment" instead of "prevent non-impairment."

**Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				process the BLM intends to employ as part of the proposed management for the river segments determined to be suitable for inclusion in the NWSRS. We request that the BLM revise the document to address these concerns.	
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	SD64	Table 2.3, page 2-57, contains no information regarding the rationale related to wild and scenic river considerations, nor proposed protective management, for any of the various segments listed in the table. The counties request that the BLM revise the RMP to address these concerns.	See Response to Comment SD24-G-25,G-1.
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	SD66	Table 5 includes "[m]anageability of the river if designated, and other means of protecting values" as a "Suitability Consideration." However, in the "Consideration Applied" column which is supposed to provide the information about manageability, the document simply states "[m]anageability ... and other means of protecting values would be extrapolated from the impact analysis for the Vernal RMP/EIS." This analysis goes nowhere as an explanation, and is inadequate to meet the requirements of Federal law and BLM Manual 8351, and further, is not supported by the impact analysis information presented on pages 4-210 through 4-215.	Appendix C of the EIS has been revised to include additional information regarding the BLM's eligibility and suitability analysis and determinations.
Draft RMP/EIS	Uintah, Daggett, and Duchesne	G-25	SD67	The draft RMP provides only cursory acknowledgment of the White River Dam project and fails to adequately represent its significance, and characterizes the impacts of	Alternatives B and D are part of the range of alternatives. There is an existing right of way for a dam on the White River in segment 1. Segment 1 was carried forward for analysis

**Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
	Counties			<p>an eligibility or suitability determination, and associated "protective management" on the proposed project in a contradictory manner. Statements found on pages 4-212 and 4-213 illustrate the cursory analysis, as follows: "...a suitable decision for Segment 1 of the White River would be incompatible with the continuation of an existing permit for a dam site" and t]he suitability decision for Segment 1 of the White River would result in the discontinuance of the existing permit for the dam site." The White River is also described as part of Alternative D, on page 2-57, as follows: "[u]nder this alternative, suitability findings would not be made and eligibility would continue with BLM applying protective management to the free flowing nature, outstandingly remarkable values, and tentative classification of the river." The discussion of Alternative D on page 4-214, reaffirms that Segment 1 of the White River "would remain eligible." However, in a contradictory manner, the discussion also states, "Segment 1 has been identified for a potential dam site." Subsequently, the last paragraph on page 4-214 concludes the description of Alternative D, as follows: "Under this alternative, the continued eligibility decision for Segment 1 of the White River would be incompatible with continuance of the existing permit for the dam site. Because this permit would continue under this alternative, the free-flowing nature of Segment 1 would not be maintained and this</p>	<p>purposes under the wild and scenic river situation.</p> <p>Also, see Response to Comment SD8-G-9.</p>

**Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				segment would no longer be eligible as a Wild and Scenic River." Further, Appendix C, Wild and Scenic River Eligibility, Suitability, Classification and Review does not include any information regarding the White River Dam Project.	
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	SD68	On pages 4-211 and 4-212, the discussion of Alternative A contains contradictory statements. For example, on page 4-211, the RMP states that "where mineral leasing [is] allowed with standard stipulations or timing and controlled surface use, or where other mineral development would be allowed within the corridor of the White River (Segments 1 and 3) .... the outstandingly remarkable values of these rivers would be at risk." Segment 1 of the White River is addressed again under this same alternative, at page 4-212, which states that "the White River (Segments 1 and 2) would largely be protected from disturbance related to mineral development by either being closed to mineral leasing or by no surface occupancy stipulations." Based on this information, Segment 1 of the White River is both "at risk" and "largely protected" from mineral development under Alternative A. The same language, and thus the same apparent contradiction, exists in the discussion of Alternative C. No information, which offers any clarity, exists elsewhere in Chapters 2, 3 or 4 of the RMP. The counties request that the RMP be revised to correct these issues concerning the White River.	Chapter 4 of the PRMP/FEIS has been revised to correct and clarify the apparent contradiction.

**Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	SD69	The discussion of Alternative B on page 4-213 includes the following statement, "If acquired lands along Nine Mile Creek are grazed, the outstandingly remarkable cultural and scenic values would be more at risk than with Alternatives A and C". Unfortunately, nowhere in the draft RMP and EIS is there other mention of this apparent concern, or other information that would enable the reviewer to grasp its relative significance. We strongly object to this unsupported assertion that grazing threatens the ORVs in the area, especially on lands that may be acquired. Grazing can be managed to protect cultural and riparian values. The BLM needs to carefully explain the potential difficulties of this area, and analyze them in terms of proper mitigation, rather than making unsupported blanket statements such as this. In addition, the discussion of Alternative A at pages 4-211 and 4-212, contains no reference to any "acquired lands along Nine Mile Creek."	Chapter 4 of the PRMP/FEIS has been revised to correct and clarify the apparent contradiction.
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	SD70	As a matter of clarification, the document, at page S-3, refers to sections of rivers, ranging from one to six rivers, which are recommended for Wild and Scenic River designation. Throughout the remainder of the document, the discussion of wild and scenic rivers refers to segments of rivers, rather than separate individual rivers. The confusion is immediately apparent when the reader looks to Table S.3, as directed by the text on page S-3. Clarity could be achieved by indicating the number of segments associated with the rivers, i.e.,	Table S.3 of the Executive Summary in the PRMP/FEIS has been corrected and the issue clarified regarding the number of rivers and river segments.

**Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers**

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				"Alternative C ... recommends 9 segments of six rivers."	
Draft RMP/EIS	Uintah, Daggett, and Duchesne Counties	G-25	SD71	The information at page 2-29 does not fully characterize proposed interim management of WSRs, because the discussion of management of eligible segments, found at page 3-84, is not presented here. We recommend that information similar to that found at page 3-84 be included at page 2-29.	Chapter 2 of the PRMP/FEIS has been revised to be consistent with the information found in Section 3.14.3.2 regarding WSRs.
Draft RMP/EIS	Utah Farm Bureau Federation	O-9	SD38	When Alternative D includes an ACEC designation in the Lower Green River Expansion of only 1,700 acres less than Alternatives A and C, how could Alternative D "not have the benefits" described for Alternatives A and C? It should provide the same benefits but to a slightly lesser degree.	Chapter 4 in the PRMP/F EIS has been revised to indicate that Alternative D would have lesser benefit than Alternatives A, C, and E.
Draft RMP/EIS	EOG Resources	O-17	SD231 (SD-ZZ)	EOG requests that development of valid and existing leases and associated rights to access leases within a Wild and Scenic River designation would be protected. The clarity of this analysis should be improved addressing the valid existing rights issue more forthrightly and by consistently accounting for stipulations in Appendix K and Section 4.14.2 so that the source and nature of those restrictive measures proposed in the DEIS can be understood.	See Response to Comment SD174-O33. The potential impacts of restrictions included in Appendix K were incorporated into the analysis contained in Chapter 4.
Draft RMP/EIS	EOG Resources	O-17	SD233 (SD-BBB)	BLM Manual 8351, in Section .51 Management Designated WSRs, states "reasonable mining claim and mineral lease access will be permitted" in designated scenic river corridors. Because BLM manual 8351 allows for some flexibility in how W&SRs are to be managed,	Chapter 2 in the PRMP/FEIS has been revised to clarify that suitable rivers/river corridors will be managed to protect their outstandingly remarkable values, tentative classifications, and free-flowing nature. Specific resource allocations and management prescriptions

Table 5.14dd. Comments Requiring a Change in the Document: Wild and Scenic Rivers

Comment Period	Commenter Name	Comment Number & Resource Category		Comment Text	Response to Comment
				and the stipulations described in Appendix K provide a broad, relatively non-specific range of management within each proposed W&SR corridor, there is no clear description of how these areas would be managed under each alternative. This lack of proposed management prescription associated with each specially designated area makes it impossible for EOG to determine how the proposed designations would affect its current and future leases and development potential.	within and outside of eligible river corridors are shown on alternative maps, whether or not such information is described in the wild and scenic river section of Chapter 2.
Draft RMP/EIS	Utah Rivers Council	O-26	SD175 (PR-I)	Seven suitability factors for Wild and Scenic Rivers were considered, but in many cases the "notes" section was left unresolved and vague. More importantly, the basis for rejecting segments as unsuitable was not provided, except in the cases where the limited nature of federal land ownership may make management a challenge. Nowhere in the draft RMP does the Vernal BLM share how they evaluated the factors to come to a decision about suitability. Because of this disconnect, the DRMP's suitability determinations are not supported by substantial evidence on the record and so are not defensible. In addition the seven factors that were considered are incomplete. We respectfully request that the VFO conduct in depth suitability analysis of all the rivers and streams found eligible for protection using the approach recommended by the Interagency Wild & Scenic Rivers Coordinating Council and involving the public throughout the process.	The WSR suitability appendix has been expanded to address the suitability factors in more detail. However, although the factors are clearly discussed for each eligible river segment, there is no "rejecting segments as unsuitable" in this appendix or elsewhere in the RMP/EIS. The actual decision regarding suitability and the rationale for that decision will be made in the record of decision for the RMP/EIS.

## 5.6. DISTRIBUTION LIST FOR THE PROPOSED RMP/FINAL EIS

A copy of the PRMP/FEIS has been sent to all the entities identified in the distribution list below (Table 5.15). The individuals, groups, organizations, and agencies included in the mailing list for the Vernal RMP will be notified that the PRMP/FEIS is available and a hard copy or compact disc of the document can be provided upon request. In an effort to reduce printing costs, the PRMP/FEIS is also available on the Vernal RMP website at <http://www.blm.gov/ut/st/en/fo/vernal/planning.html/>, the Vernal Field Office, the public room in the BLM Utah State Office, and the public libraries listed on the distribution list.

**Table 5.15. Distribution List for the Proposed RMP/Final EIS**

<b>Bureau of Land Management</b>	
U.S. Department of the Interior Bureau of Land Management Washington, DC	U.S. Department of the Interior Bureau of Land Management Utah State Office Salt Lake City, Utah
U.S. Department of the Interior Bureau of Land Management White River Field Office Meeker, CO	U.S. Department of the Interior Bureau of Land Management Craig, CO
U.S. Department of the Interior Bureau of Land Management Grand Junction, CO	U.S. Department of the Interior Bureau of Land Management Moab, UT
U.S. Department of the Interior Bureau of Land Management Rock Springs, WY	U.S. Department of the Interior Bureau of Land Management Price, UT
<b>Federal Agencies (Required)</b>	
Bureau of Reclamation Denver Federal Center Denver, CO	U.S. Geological Survey Reston, VA
U.S. Fish and Wildlife Service Division of Environmental Quality Arlington, VA	National Park Service Washington, DC
Office of Environmental Compliance Department of Energy Washington, D.C.	Bureau of Indian Affairs Reston, VA
U.S. Environmental Protection Agency Office of Federal Activities Washington, DC	Office of Surface Mining Washington, DC
U.S. Geological Survey Environmental Affairs Program Reston, VA	Office of Environmental Policy and Compliance U.S. Department of the Interior Washington, DC

**Table 5.15. Distribution List for the Proposed RMP/Final EIS**

U.S. Environmental Protection Agency Region 8 Denver, CO	U.S. Department of the Interior Natural Resources Library Washington, DC
Minerals Management Service Environmental Division Herndon, VA	Federal Depository Library System Government Printing Office Washington DC
<b>Additional Federal Agencies</b>	
Mineral Management Service P.O. Box 25165 Denver, CO 80225	Natural Resources Conservation Service Provo Service Center 302 E 1860 S Provo, UT 84606-6154
Federal Highway Administration Utah Division 2520 W. 4700 South Suite 9A Salt Lake City, UT 84118	U.S. Army Corps of Engineers Chief, Planning Diving 1325 J Street Sacramento, CA 95814-2922
U.S. Department of Energy Grand Junction Office 2597 B ¾ Road Grand Junction, CO 81503	Deputy Assistant Secretary of the Air Force Environment, Safety, and Occupational Health 1660 Air force, Pentagon Washington DC 20330-1660
Betsy Hermman U.S. Fish and Wildlife Service 2369 W. Orton Cir. Suite 50 West Valley City, UT 84119	Federal Depository Library System Government Printing Office 732 North Capitol Street NW Washington DC 20401
Bureau of Reclamation 302 E. 1860 South Provo, UT 84606-7317	Bureau of Indian Affairs Fort Duchesne, UT
U.S. Fish and Wildlife Service Ecological Services Denver, CO	National Park Service Salt Lake City, UT
National Park Service Dinosaur National Park Dinosaur, CO	Ashley National Forest Vernal, UT
Corps Of Engineers Grand Junction, CO	

**Table 5.15. Distribution List for the Proposed RMP/Final EIS**

<b>State Agencies (Required)</b>	
Carolyn Wright RDCC Coordinator, Public Lands Section Public Lands Policy Coordination Office 5110 State Office Building PO Box 141107 Salt Lake City, UT 84114-1107	Utah School and Institutional Trust Lands Administration Lavonne Garrison 675 East 500 South, Suite 500 Salt Lake City, UT 84102
Utah State Historic Preservation Office Matt Seddon 300 South Rio Grande Street Salt Lake City, UT 84101	
<b>Additional State Agencies</b>	
Utah Division of History Salt Lake City, UT	Utah Division of Water Resources Salt Lake City, UT
Utah Department of Natural Resources Salt Lake City, UT	Utah Division of Wildlife Resources Northeast Region Vernal, UT
State Institutional Trust Lands Administration Salt Lake City, UT	Utah Division of Wildlife Resources Salt Lake City, UT
Utah State Parks & Recreation Salt Lake City, UT	Utah Division of Workforce Services Vernal, UT
<b>Local Government</b>	
Uintah County Commissioners Vernal, UT	Daggett County Commissioners Manila, UT
Duchesne County Commissioners Duchesne, UT	Uintah & Ouray Tribal Business Committee Fort Duchesne, UT
Uintah County Planning Office Vernal, UT	Uintah County Road Department Vernal, UT
Uintah County Public Lands Committee Vernal, UT	Vernal Area Chamber of Commerce Vernal, UT
Duchesne County Planning & Zoning Duchesne, UT	Roosevelt City Corporation Roosevelt, UT
Naples City Naples, UT	Naples Police Department Naples, UT
<b>Tribal</b>	
Ute Mountain Ute Tribe Towaoc, CO	Confederated Tribes Of The Goshute Reservation Ibapah, UT
Laguna Pueblo Laguna, NM	Southern Ute Tribal Council Ignacio, CO

**Table 5.15. Distribution List for the Proposed RMP/Final EIS**

Santa Clara Pueblo Española, NM	Hopi Tribal council Kykotsmovi, AZ
Navajo Nation Window Rock, AZ	Northwestern Band of Shoshone Nation Brigham City, UT
White Mesa Ute Council White Mesa, UT	Zia Pueblo Zia Pueblo, NM
Ute Indian Tribe Fort Duchesne, UT	Eastern Shoshone Business Council Fort Washakie, WY
<b>Other Organizations</b>	
Action Target, Inc. Provo, UT	National Trust For Historic Preservation Washington, DC
AE Vernal, UT	Natural Gas Resources Defense Council Washington, DC
AEC Oil & Gas Company Denver, CO	Nature Conservancy Of Utah Salt Lake City, UT
Alton N. Moon & Sons Duchesne, UT	Nine Mile Canyon Coalition Price, UT
American Gilsonite Company Bonanza, UT	Northeastern Utah Visitors Center Vernal, UT
Anadarko Petroleum CO Denver, CO	Oil & Gas Accountability Project Durango, CO
Ashley Valley Veterinary Vernal, UT	Oregon Episcopal School Portland, OR
Bar F Partnership Myton, UT	OSO Energy Resources Corporation Durango, CO
Bar Lazy J Ranch Vernal, UT	Ouray Construction Inc. Vernal, UT
Basin Sports Vernal, UT	Ouray, Ute Wildlife Refuge Randlett, UT
Beecher Films Salt Lake City, UT	People For The West Vernal, UT
Bennion Land And Livestock LLC Vernal, UT	Petroglyph Denver, CO
Bill Barrett Corporation Denver, CO	Petroleum Exploration Wheatridge, CO
Biology And Environmental Studies Keene, NH	Piney Valley Ranches Trust Craig, CO
BJ Services Jensen, UT	PLC-UC Vernal, UT
Bjork, Lindley, & Little Denver, CO	Provo Area-BOR Provo, UT

**Table 5.15. Distribution List for the Proposed RMP/Final EIS**

Blackhawk Engineer Helper, UT	Public Land Policy Coordination Office Salt Lake City, UT
Booz-Allen-Hamilton Falls Church, VA	Public Lands Advocacy Denver, CO
Bork, Lindley, Danielson & Little, Pc Denver, CO	QEP Uinta Basin, Inc Vernal, UT
Brown's Park Maybell, CO	Questar E&P Denver, CO
Budd-Falen Law Offices, LLC Cheyenne, WY	Questar Market Resources Group Salt Lake City, UT
Buys & Associates Littleton, CO	Questar Regulated Services, Co. Salt Lake City, UT
C. W. McCoy Sheep CO. C/O Paul W. McCoy Vernal, UT	Raftopoulos Brothers Craig, CO
C.E. Brooks & Associates Denver, CO	Red Man Pipe & Supply Vernal, UT
Californians For Western Wilderness San Francisco, CA	Rising Sun 4x4 Club Of Colorado Littleton, CO
Carroll/Carroll Davidson Partnership Ltd. Meeker, CO	Robert H. Williams, Family Trust Vernal, UT
Center For Native Ecosystems Denver, CO	Rocky Mountain Elk Foundation Missoula, MT
Center For Natural Resources Denver, CO	Rocky Mountain Power Salt Lake City, UT
Chacoi, Inc. Paonia, CO	Ruperstrain Cyber Services Flagstaff, AZ
Chew Livestock Jensen, UT	Rural Public Lands County Council Washington, DC
Chivers Ranch Inc. Vernal, UT	School & Institutional Trust Lands Administration Salt Lake City, UT
Citizens Oil & Gas Support Center Durango, CO	School Of Aquatic And Fishery Sciences Seattle, WA
Colorado State University Library Fort Collins, CO	Searle Brothers C/O Larry Searle Vernal, UT
Colton Ranch Inc. Bountiful, UT	Shenandoah Energy Vernal, UT
Cook Livestock Vernal, UT	Siddoway Diamond Mountain Association Vernal, UT

**Table 5.15. Distribution List for the Proposed RMP/Final EIS**

Craig's Roustabout Services Jensen, UT	Sierra Club Salt Lake City, UT
Cripple Cowboy Cow Outfit, Inc Rangely, CO	Simper Lumber, Inc. Vernal, UT
Daggett County Library Manila, UT	Simplot Phosphates LLC Vernal, UT
Davidson Yellow Jacket Ranch, Ltd. Meeker, CO	Smiling Lake Consulting Evergreen, CO
Dept Of Bioengineering Salt Lake City, UT	Southern Utah Wilderness Alliance Moab, UT
Dept Of Integrative Biology Provo, UT	Southern Utah Wilderness Alliance Salt Lake City, UT
Deseret News Salt Lake City UT	Stewart Mach & Vernal, UT
Diamond Mountain Rustlers Myton, UT	Stone Art CO. Orem, UT
Dinaland Snow Vernal, UT	Stonegate Resources, LLC Park City, UT
Dinosaurland Travel Board Vernal, UT	Strawberry River Livestock, Inc. Duchesne, UT
Director Of Conservation Program Flagstaff, AZ	Stuntz Valley Ranch L C Jensen, UT
Duchesne County Water District Roosevelt, UT	SWT Consulting Stanford, CA
Duchesne County Library Roosevelt, UT	The Access Fund Boulder, CO
Earth Justice Denver, CO	The Cleveland-Cliffs Iron Company Rifle, CO
Elcan And Associates, Inc. Mobile, AL	The Cliffs Synfuel Corp. Rifle, CO
Elmer R. Moon & Sons Duchesne, UT	The National Outdoor Leadership School Lander, WY
Environment Preservation Foundation Salt Lake City, UT	The Nature Conservancy Salt Lake City, UT
EOG Resources Denver, CO	The Salt Lake Tribune Salt Lake City, UT
EOG Resources, Inc. Big Piney, WY	The Shipley Group Woods Cross, UT
EOG Resources, Inc. Denver, CO	The Wilderness Society Denver, CO

**Table 5.15. Distribution List for the Proposed RMP/Final EIS**

Colorado River Basin Salinity Forum Bountiful, UT	Theodore Roosevelt Conservation Partnership Boulder, WY
FIML Natural Resources Denver, CO	Thunder Ranch, L.L.C. Jensen, UT
Flying C Ranches Bluffdale, UT	Titan Energy Resources Park City, UT
Forest Guardians Santa Fe, Nm	TRC Mariah Association Inc Laramie, WY
Forestry & Lands, Utah Vernal, UT	Tri W Pipe & Supply Roosevelt, UT
Fulbright & Jaworski LLP Denver, CO	Uintah Basin Grazing Association Talmage, UT
Gardner Family Trust Vernal, UT	Uintah Basin Grazing Association Mountain Home, UT
Goodrich MUC CO Vernal, UT	Uintah Basin Standard Roosevelt, UT
Grant L. Hacking Family LLC Vernal, UT	Uintah County Library Vernal, UT
Hacking Land & Livestock Vernal, UT	Uintah Engineering & Land Vernal, UT
Halliburton Vernal, UT	Uintah Mountain Club Vernal, UT
Hawk Watch International Salt Lake City, UT	US Steel Corp. Pittsburgh, PA
High Country News Paonia, CO	Glen Canyon National Recreation Area Page, AZ
Hiko Bell Mining & Oil Company Vernal, UT	USU Uintah Basin Vernal, UT
Hoy Mountain Ranch, L.L.C. Vernal, UT	Utah Cattlemen's Association Salt Lake City, UT
Hunt Oil Company Cody, WY	Utah Environmental Congress Salt Lake City, UT
Hunter Education Instructors Vernal, UT	Utah Farm Bureau Federation Sandy, UT
Hunting Ray Jensen, UT	Utah Natural Heritage Program Salt Lake City, UT
J R Day Investments Coalville, UT	Utah Rivers Council Salt Lake City ,UT

**Table 5.15. Distribution List for the Proposed RMP/Final EIS**

J. Willard Marriott Library Government Documents Dept. Salt Lake City, UT	Utah Rock Art Research Association Salt Lake City, UT
John Siddoway Livestock & Investment Company Salt Lake City, UT	Utah Shared Access Alliance Spanish Fork, UT
KN Energy Vernal, UT	Utah Snowmobile Association Salt Lake City, UT
KNEU Radio Roosevelt, UT	Utah State University Logan, UT
KVEL Radio Vernal, UT	Utah Water User Association Murray, UT
LCD Trust Randlett, UT	Utah Wilderness Coalition Salt Lake City, UT
Leland N. Sowards Partnership West Valley City, UT	Vantage Energy Englewood, CO
Lexco, Inc Vernal, UT	Vermillion Ranch Limited Partners Rock Springs, WY
Litmus Epollc Littleton, CO	Vernal Express Vernal, UT
Lonesome Horse Ranch Vernal, UT	Vincent Brothers Sunshine Ranch Jensen, UT
Magic Valley ATV Riders Twin Falls, ID	Wasatch Mountain Club Salt Lake City, UT
Marta Corp. Vernal, UT	Western Land Exchange Project Seattle, WA
McCall Saddle Vernal, UT	Western Watershed Project Mender, UT
McDermott, Will & Emery Washington, D.C.	Western Wildlife Conservancy Salt Lake City, UT
Merrick & CO Aurora, CO	White Mesa Ute Council White Mesa, UT
Montgomery & Neal, LLC Prineville, OR	Wild Scenic Rivers Programs Washington, DC
Moon Ranch L.L.C. Duchesne, UT	Wilderness Society Denver, CO
Morapos Creek Sheep CO. Meeker, CO	Willow Creek Land And Livestock Inc. Dutch John, UT
Naples Police Department Naples, UT	WP Wells Petroleum, Inc. Genesse Center I Golden, CO

**Table 5.15. Distribution List for the Proposed RMP/Final EIS**

National Outdoor Leadership School Lander, WY	ZCM Drilling Vernal, UT
National Outdoor Leadership School Vernal, UT	Ziegler Chemical & Mineral Corp. Bonanza, UT
	Ziegler Chemical & Mineral Corp. Jericho, NV

## 5.7. LIST OF PREPARERS

The BLM Vernal FO DRMP/EIS was written and produced by a team composed of BLM Vernal FO interdisciplinary resource specialists and SWCA, Inc., an independent, third-party consulting firm. In accordance with 40 CFR 1506.5(c), SWCA certified that it does not have any financial or other interest in the outcome of the decisions made pursuant to this RMP/EIS. Under the guidance and direction of the BLM, and in collaboration with the cooperating agencies, the team developed alternatives, collected baseline data to be used in the analysis, assessed potential effects of the alternatives, and prepared all the necessary elements of an RMP with additional participation, comments, and critique from the cooperating agencies. Table 5.16 lists the team members, job titles, and responsibility associated with the RMP/EIS.

**Table 5.16. List of Preparers**

Name	Position	Planning Role
<b>SWCA Environmental Consultants</b>		
Laura Burch	Environmental Planner	Socioeconomics, Hazardous Materials
Catherine Chatfield	GIS Specialist	GIS
Tonya Dombroski, Ph.D	Environmental Chemist	Air Quality
Sheri Ellis	Cultural Resources Lead	Fire Management, Lands and Realty, Cultural Resources
Jason Green	Environmental Planner	Recreation, Transportation
Janet Guinn	Project Coordinator	Formatting
Dave Harris	NEPA Specialist	Recreation, Visual, Woodlands
Susan Martin	Ecologist	Vegetation, TES Plants
Kristin Knippenberg	Resource Specialist, Technical Editor	Editing/Minerals
Brian Nicholson	Ecologist	Riparian and Soils and Watershed
Mathew Petersen	Principal Ecologist	QA/QC
Deb Reber	Natural Resources Planner	Project Manager/ QA/QC
Jan Reed	Ecologist	Livestock Grazing
Mathew Seddon, Ph. D	Anthropologist	Cultural Resources
Thomas Sharp	Ecologist	Wildlife, Special Status Species

**Table 5.16. List of Preparers**

<b>Name</b>	<b>Position</b>	<b>Planning Role</b>
<b>Bureau of Land Management</b>		
Howard Cleavinger	Associate Field Manager	Project Manager
Kelly Buckner	Planning and Environmental Coordinator	Project Manager, QA/QC, writer/editor
Denise Ohler	Environmental Administrative Assistant	QA/QC, writer/editor
Craig Nichols	National Air Quality Modeler – BLM NOC	Air Quality
Blaine Phillips	Archaeologist	Cultural Resources, SHPO Consultation
Stephanie Howard	Planning and Environmental Coordinator	Environmental Justice
Troy Suwyn	Fire Management Officer	Fire Management
Jo-Ann Stroh	IT Specialist	GIS
Kyle Smith	Cartographic Technician	GIS
Merlin Sinfield	Civil Engineering Technician	Hazardous Materials
Naomi Hatch	Branch Chief – Lands and Minerals	Lands & Realty
Marc Stavropoulos	Supervisor Range	Forage, Livestock Grazing, Wild Horse & Burros
Jerry Kenzcka	AFM for Lands and Minerals	Minerals and Energy Resources
Robin Hansen	Geologist	Paleontology
Chuck Patterson/ Jason West	Recreation Planner	Recreation, Special Designations, Visual Resource Management,
Tim Faircloth	AFM for Renewable Resources	Riparian and Wetlands
Bill Stevens	Recreation Planner	Socioeconomics
Steve Strong	Natural Resource Specialist	Soil and Water Resources
Amy Torres	Wildlife Biologist	Special Status Species, Section 7 Consultation, Wildlife and Fisheries
Clayton Newberry/ Jesse Salix	Botanist	Special Status Species, Vegetation
David Palmer	Forester	Woodlands and Timber

## 5.8. RECORD OF DECISION

Following publication by the EPA and BLM of a Notice of Availability of the PRMP/FEIS in the Federal Register on August 15, 2008 and distribution of the PRMP/FEIS, a 30-day protest period runs. In addition, a 60-day Governor's Consistency Review period runs concurrently with the protest period.

The State Director will approve the PRMP/FEIS by issuing a public Record of Decision (ROD), which is a concise document summarizing the findings and decisions brought forth from the PRMP. However, approval shall be withheld on any portion of a plan being protested until final

action has been completed on such protest. Before such approval is given, there shall be public notice and opportunity for public comment on any significant change made to the Proposed RMP. Among other decisions, the proposed ACEC designations and OHV categories (limitations and closures) will be approved when the ROD is signed.

Management actions specified for the Proposed Alternative in Chapter 2 of the PRMP/FEIS are labeled as follows:

**Land-use Plan Decisions (P):** These broad-scale decisions guide future land management actions and subsequent site-specific implementation decisions. Land-use plan decisions fall into two categories: desired outcomes (goals; standards, including land health standards; and objectives) and allowable uses and actions to achieve outcomes. Proposed land-use plan decisions are protestable to the BLM Director.

**Implementation Decisions (I):** These decisions take action to implement land-use plan decisions on a site-specific basis. They may be incorporated into implementation plans or may exist as stand-alone decisions. When issued, implementation decisions are generally appealable to the Interior Board of Land Appeals as outlined in 43 CFR Part 4.

**Administrative and Policy Decisions (A):** These decisions are based on law, regulation, and/or policy and do not require a land-use plan decision or implementation decision. They are not protestable or appealable.

## **5.9. VERNAL RMP/EIS MEETING AND COORDINATION LOG**

### Contractor Interviews

- Contractor met with Daggett County Commission to identify planning issues and discuss Coop. Agency Status – November 6, 2001.
- Contractor met with Uintah County Commission to identify planning issues and discuss Coop. Agency Status – November 2001.
- Contractor met with Duchesne County Commission to identify planning issues and discuss Coop. Agency Status – November 9, 2001.

### Coordination Meetings and Other Contacts

- Met with State Legislators (Evans, Snow, and Seitz) – July 20, 2001.
- Met with Daggett County Commission – August 21, 2001.
- Met with FWS (Dan Alonzo). Discussed plan and EPCA – August 28, 2001.
- Partners Meeting at BLM, briefed on plan – September 4, 2001.
- Met with EPA and FWS in SLC, briefed on plan – September 14, 2001.
- Uinta Basin Partners, briefed group on planning schedule and progress – October 9, 2001.
- Oil and Gas Working Group, briefed group on planning schedule and progress – October 10, 2001.
- Ute Tribe, briefed Business Committee on plan and expressed desire to work closely with them – October 11, 2001.
- Met with Uintah County – November 9, 2001.

- Met with Daggett County – November 20, 2001.
- Met with Fish & Wildlife Service – November 28, 2001.
- Met with Environmental Protection Agency – November 28, 2001.
- Met with Oil and Gas Working Group – November 29, 2001.
- State Legislators (Beverly Evans, Gordon Snow, Dan Price) – November 30, 2001.
- Met with Daggett County – January 8, 2002.
- Met with Environmental Protection Agency – January 14, 2002.
- Fish & Wildlife Service – January 14, 2002.
- Utah State University on Resource Assessments, all County Commissioners Invited (Rich Etchberger) – January 18, 2002.
- Met with Uintah County – January 29, 2002.
- Met with Duchesne County – January 31, 2002.
- Met with Uintah County – February 6, 2002.
- Ute Business Committee (SWCA attended) – February 6, 2002.
- Uintah County Public Lands Committee – February 11, 2002.
- Duchesne County – March 20, 2002.
- Duchesne County Public Lands Committee – March 20, 2002.
- Utah State University (Resource Assessment Progress Report), County Commissioners Invited – April 18, 2002.
- Duchesne County (SWCA attended). County was given copies of Scoping Comments and Summary, Draft Mineral Potential Report, and Planning Bulletins – April 30, 2002.
- Duchesne County (Moore and Howell) – May 3, 2002.
- Uintah County – May 7, 2002.
- Uintah County (SWCA attended). County was given copies of Scoping Comments and Summary, Draft Mineral Potential Report, and Planning Bulletins – May 15, 2002.
- Daggett County (SWCA attended). County was given copies of Scoping Comments and Summary, Draft Mineral Potential Report, and Planning Bulletins – May 15, 2002.
- Fish & Wildlife Service (Dan Alonzo) – May 22, 2002.
- Forest Service (Ashley, Bert Kulesza) – May 22, 2002.
- Uintah County Public Lands Committee – June 10, 2002.
- State of Utah (John Harja) on Wild & Scenic Rivers – June 10, 2002.
- Uinta Basin Partners – June 12, 2002.
- Uintah County Commission and members of Public Lands Committee – June 24, 2002.
- Fish & Wildlife Service (Salt Lake City) – July 2, 2002.
- Ute Business Committee (Coop. Agency Agreement) – July 9, 2002.
- Utah State University (Resource Assessment Progress Report), All County Commissioners invited – July 12, 2002.
- Uinta Basin Association of Governments – July 16, 2002.
- Joint meeting with Meeker and Craig Field Offices – July 16, 2002.

- State of Utah (Wild & Scenic Rivers) – July 23, 2002.
- Joint meeting with Grand Junction, Meeker, Craig, & Moab Field Offices on SUWA's proposed wilderness areas – July 30, 2002.
- Ute Business Committee (Wild & Scenic Rivers) – August 27, 2002.
- RAC (Discussion of Raptor Best Management Practices Scenarios) – August 27, 2002.
- Alternative Development Meeting with Counties, FWS, Resource Specialists, and Contractor – October 7, 2002.
- Alternative Development Meeting with Counties, FWS, Resource Specialists, and Contractor – October 8, 2002.
- Alternative Development Meeting with Counties, FWS, Resource Specialists, and Contractor – October 22, 2002.
- Alternative Development Meeting with Counties, FWS, Resource Specialists, and Contractor – October 23, 2002.
- Alternative Development Meeting with Counties, FWS, State of Utah and Contractor – Oct. 28, 2002.
- Duchesne County Commission to discuss coordination problems – October 28, 2002.
- Alternative Development Meeting with Counties and Contractor – November 4, 2002.
- Uintah County Commission to discuss coordination problems and give them a copy of the AMS and Mineral Potential Report – November 4, 2002.
- Alternative Development Meeting with Counties, State of Utah, and Contractor – November 5, 2002.
- EPA in Vernal F. O. to discuss air quality modeling for the RMP effort – November 6, 2002.
- The working draft of Chapter 2 and alternative matrix was sent to Uintah County and UBAG for their use and review – November 22, 2002.
- Copies of 20 Wilderness Determination forms were sent to Uintah County – December 2, 2002.
- A draft copy of the Paleontological section of the AMS was sent to Uintah County – December 3, 2002.
- Draft copies of the Livestock Grazing and Alternative Energy sections of the AMS were sent to Uintah County and UBAG for their review – December 18, 2002.
- Brief Utah Division of Wildlife Resources on alternatives for the plan – December 4, 2002.
- Met with State of Utah DEQ to review protocol for Air Quality Modeling for RMP. Attended by BLM (Utah & Colo.), SWCA (Deb Reber), Trinity Consultants (YuShan Huang), and the Uinta Basin Association of Governments (Clayton Chidester) – December 14, 2002.
- Met with State of Colorado DEQ to review protocol for Air Quality Modeling for RMP. Attended by BLM (Utah & Colo.), and Trinity Consultants (YuShan Huang). Clayton Chidester was invited but did not attend. – December 16, 2002.
- Uinta Basin Partners Meeting, briefed those in attendance on progress on RMP. – January 8, 2003.

- Met with Park Service to discuss the Alternatives for the RMP that could impact the Monument. – January 8, 2003.
- Met with Senator Beverly Evans and the Uinta Basin Association of Governments to brief them and answer questions about the status and progress of the RMP – January 16, 2003.
- Briefed new BIA Superintendent on RMP effort – January 22, 2003.
- Briefed Utah Division of Wildlife Resources on alternatives for the plan – January 27, 2003.
- Met with Clayton Chidester and Dave Allison (UGAOG) to discuss issues related to the RMP – January 28, 2003.
- Daggett County Commission, updated them on progress of RMP effort – February 3, 2003.
- Duchesne County Commission, updated them on progress of RMP effort – February 6, 2003.
- Meeting between BLM, EPA, Forest Service, Park Service, FWS, and Air Quality Subcontractor for RMP to discuss protocol for air quality analysis for RMP. Clayton Chidester (UBAG) was invited to attend but declined – February 11, 2003.
- Uintah County Commission, updated them on progress of RMP effort – February 12, 2003.
- BLM met with John Harja (State Of Utah) and Cathryn Collis (SWCA) to discuss alternative presentation in the RMP – February 13, 2003.
- Met in Uintah County Building to discuss county concerns about RMP schedule. The meeting was attended by County Commissioners from all three counties, UBAG, State of Utah, Senator Beverly Evans, and BLM. The BLM State Director and Vernal Field Office Manager were both in attendance – February 14, 2003.
- Worked with Uinta Basin Association of Governments (Clayton Chidester) to scan, or copy, 1979 wilderness files, 1999 wilderness inventory files, and externally generated proposed wilderness files – February 18, 19, 20, 25,26, 27, 2003.
- Partners Meeting, held at Fire Center. RMP update was presented. Commissioners from Daggett and Duchesne Counties were present – March 12, 2003.
- Partners Meeting, held at BLM's new fire building. RMP update was presented and an offer was made to meet and discuss the plan in more detail with anyone that was interested. – April 9, 2003.
- Uintah County Public Lands Committee meeting, attended to respond to any questions committee members may have about the RMP. – April 14, 2003.
- State Resource Development Coordination Committee (RDCC) meeting at DNR Building in SLC. Briefed the members on the top five issues in the RMP: Oil and Gas, OHV, Raptors, Special Designations, and Wild Horses. A question-and-answer session was held following the briefing. – April 16, 2003.
- Question-and-answer session with counties and State on draft alternatives for RMP, attending were Louise Sainsbury, Clayton Chidester, Dave Allison, Mike McKee, LaVonne Garrison, and John Harja. Held at BLM office – April 24, 2003.

- Question-and-answer session with counties and State on draft alternatives for RMP, attending were Louise Sainsbury, Clayton Chidester, Dave Allison, Mike McKee, and LaVonne Garrison. Held at BLM office – May 6, 2003.
- Question-and-answer session with counties and State on draft alternatives for RMP, attending were Louise Sainsbury, Clayton Chidester, Dave Allison, and Scott Chamberland. Held at BLM office – May 12, 2003.
- Question-and-answer session with counties and State on draft alternatives for RMP, attending were Louise Sainsbury, Clayton Chidester, Dave Allison, Mike McKee, Diana Whittington. Raptor Management was the topic of discussion for the meeting. BLM gave the counties copies of the Alternative Matrix for the RMP that we had been using at the last five meetings to record county comments and concerns. They were going to review the comments, make needed corrections, and send it back to BLM through the County Commissioners as their official comments on the draft alternatives. Meeting was held at the Vernal BLM office – May 27, 2003.
- May 28, 2003 – Meeting with the Ute Business Committee at Fort Duchesne, Utah. The purpose of the meeting was to keep the Business Committee informed and involved in the BLM-Resource Management Plan. The meeting included a presentation and discussion of the following topics:
  - Area of Critical Environmental Concern (ACEC)
  - Wild & Scenic Rivers
  - Off Highway Vehicle (OHV) Designated Travel
  - Oil and Gas leasing Categories
  - Wild Horses
  - Hill Creek Extension federal subsurface minerals issues
- Question-and-answer session with the counties and State on the draft alternatives for the RMP. The focus of the meeting was to present modifications to the RMP that were required following the Wilderness Settlement. Attending were Louise Sainsbury, Clayton Chidester, Dave Allison, Mike McKee, and Val Payne. The meeting was held at the BLM Office – June 3, 2003.
- Met with John Harja and Val Payne on Friday June 6, 2003, at the SWCA Office in SLC to explain the changes that were made to the alternatives in the RMP that were required as a result of the Wilderness Settlement. Dave Howell, Deb Reber, Dave Moore, Steve Knox, and Maggie Kelsey were also in attendance.
- Joint meeting with the Ashley National Forest and the Vernal Field Office leadership teams on June 20, 2003 to discuss a variety of cross boundary issues, but with particular emphasis on the RMP and edge matching on resource management.

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