

Comments of the Draft RMP/EIS by Resource

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Air Quality

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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.	X
State of Utah	G-1	AQ2	The Uintah Basin is not within the air shed for which monitoring data is available in your document. Use of data from the Wasatch Front, an area which often has exceedances from local sources, is inappropriate.	BLM defers the selection of background air quality monitoring data to the Utah DEQ.	
State of Utah	G-1	AQ3	Additionally, the data used does not reflect the recent increase in oil and gas development emissions and associated increase in traffic-related emissions and fugitive dust. Baseline data from a Uintah Basin sources is required to accurately model the effects.	See comment response AQ2.	
State of Utah	G-1	AQ4	Also at question is the wind direction which may vary depending upon area of the Vernal Planning Area (VPA).	It is not clear what the commenter is referring. Predictive Meteorological Model (MM5) data as well as numerous surface, upper air, and precipitation data stations were used in the analysis.	
State of Utah	G-1	AQ5	Additional emission sources that were not mentioned include operations at oil wells such as the incidental flaring of produced gas, oil and gas production equipment, the Bonanza Power Plant and residential uses during the winter when inversions occur.	Flaring, completion, and drilling emissions were included in the analysis. The Bonanza Power Plant was assumed to be represented by background air quality monitoring data. Residential sources are assumed to be represented in the back-ground monitoring data.	
State of Utah	G-1	AQ6	The Goal of an Implementation Plan is listed, but receives no further mention.	Commenter does not provide enough information to respond to. The implementation plan will be completed after the Record of Decision for the plan is issued.	
State of Utah	G-1	AQ63	The State of Utah is concerned that emissions generated by the drilling and processing of oil and gas wells in the Uinta Basin were not given more	The impact of oil and gas operations was a main focus of the air quality assessment.	

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			consideration.		
State of Utah	G-1	AQ64	The Vernal draft RMP and EIS does not address the cumulative impacts of the sources of air pollution throughout the area. One oil or gas well analyzed by itself might have a negligible effect on the surrounding air quality, but hundreds or thousands of wells in the area, collectively, will have a large impact. With approximately 6300 new wells anticipated during the RMP time frame, these emissions should be considered cumulatively.	As required by CEQ regulations, a cumulative analysis was performed, which took into consideration the effects of past, present and reasonable foreseeable actions, including oil and gas development.	
State of Utah	G-1	AQ65	<p>Recent data regarding emission factors from wells in adjoining state indicate that average gas wells produce over one (1) Ton per year of Volatile Organic Compounds (VOC) per barrel per day (BPD). Associated equipment (dehydrators, heaters, etc.) produce over 10 Tons per year VOC per million cubic feet per day (MMCFD) and approximately one Ton per year of NOx per well per year. Oil wells produce on the average of 100-200 pounds of VOC per year per BPD.</p> <p>The draft RMP and EIS air quality analysis does not include any information regarding the impact of the proposed alternatives on ozone. VOC and NOx have been found to be precursors to the formation of ozone. Ozone is a National Ambient Air Quality Standard (NAAQS) and must be addressed in this analysis.</p>	<p>EPA Region VIII, in their comments on the Roan Plateau RMP DEIS, said:</p> <p>“Running a regulatory ozone model such as RPM-IV for purposes of the DEIS is impractical, and we understand that BLM’s national Science & Technology Center may be reactant to estimate potential ozone impacts with a conservative method such as VOC/NO point source screening tables.”</p> <p>This topic will be discussed further in a future meeting with the State of Utah and the Utah DEQ. Given the above, it is not clear how a possible ozone analysis would be done. This topic will be discussed at a forthcoming meeting with the State of Utah.</p> <p>See comment response AQ54.</p>	
State of Utah	G-1	AQ66	The 1990 Clean Air Act requires all states to write State Implementation Plans that address regional haze. The thousands of tons of pollution generated by projects proposed in this RMP could easily impact visibility in	NOx emissions were included in the analysis and potential visibility impacts were estimated. See comment response AQ65 regarding VOCs and ozone.	

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			Class I areas in Utah and neighboring states. The RMP must address the effects of VOC and NOx emissions on regional haze.		
State of Utah	G-1	AQ67	The state requests a cooperating agency working group be assembled to work through these issues before the Final EIS is completed.	BLM had an initial meeting with the State of Utah to hear their concerns on the air quality section of the RMP DEIS on June 24, 2005. The State expressed a desire for further meetings to discuss some issues in more detail. These meetings were held in May and June 2008 as part of the Four Corners Task Force.	
State of Utah	G-1	AQ7	Cumulative effects should be quantitative and include past and existing emissions and particulate sources. To make projections, data on emissions is available from industry sources.	A cumulative air quality analysis was performed. Please see Chapter 4 of the DEIS and Chapter 5 of the Air Quality TSD.	
Duchesne County	G-9	AQ149	Regional haze is mentioned here as an adverse impact from compressors and generators associated with mineral extraction activities. Prescribed burns and naturally occurring wildfires are much more likely to generate regional haze; however, these adverse impacts are not mentioned in many sections of the document where the impacts of prescribed burns are listed.	The general consensus among air quality professionals is that oil and gas is usually a more significant source of potential regional haze impacts on a long-term basis.	
Duchesne County	G-9	AQ150	The cumulative effects of air quality associated with Alt D should be less than the three action alternatives due to the prescribed burning of about 105,525 fewer acres of land over the next decade under Alt D	Other sources, such as activities associated with oil and gas, were also considered in the analysis.	
Duchesne County	G-9	AQ151	DEIS states that "dust abatement measures need to comply with UAC regulation: compliance would be obtained through special stipulations as a requirement on new projects and through the use of dust abatement control techniques in problem areas." DEIS lacks information and sufficient analysis supporting a need for this change and does not expand upon what special	Section 4.2.4 in the PRMP/FEIS describes the cumulative impacts regarding air quality (including PM10 and PM2.5 dust emissions). Section 4.2.3 in the PRMP/FEIS describes mitigation measures.	

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			stipulations would be required.		
USFS— Ashley National Forest	G-19	AQ100	Section 2.4.2.1 already assures compliance with State laws. The listing of specific provisions in Utah R446 is useful as examples, but please clarify that it is the State that determines which provisions are applicable, not the BLM. Please clarify that other laws and other provisions of R446 will be followed in accordance with State regulation.	Section 4.2.2.5 in the PRMP/FEIS states that the VFO is in compliance with R446 through an MOU between the BLM, UFS, and UDAQ.	
USFS— Ashley National Forest	G-19	AQ101	This section appears to be missing pertinent local information available from agency websites – some of which is in the Air Quality Assessment Report -- and instead relies on some data “located at distances of greater than 150 miles from Vernal” (p. 3-4). Could local data also be incorporated? Enclosed with this review are some air pollution facility emissions from EPA for the areas of Duchesne, Myton, Roosevelt and Vernal (www.epa.gov/air/data/geosel.html); this was assembled for an oil and gas proposal south of Duchesne and which may help provide more local information for the BLM RMP. Some of these emission sources are listed in the Air Quality Assessment Report, but since that document only looked in detail at emissions occurring after 2000, not all local emission sources are individually examined. The NEPA document is available on the Ashley National Forest website at http://www.fs.fed.us/r4/ashley/projects/1_sowers_seismic_and%20Well_ex_03_05.pdf and additional information is in the project record. The BLM is welcome to photocopy the hard copy project record on file at Ashley National Forest offices if that is useful in this analysis.	See comment response AQ89. The methodology of using background air quality data to select sources that are explicitly modeled was agreed to during the modeling protocol process and has been standard methodology for BLM air quality analyses for several years. The BLM appreciates the FS providing access to the additional information.	
USFS— Ashley	G-19	AQ102	Noise (and associated potential wildlife disturbance) is not addressed. An affected environment description for	Mufflers on pump jacks have been used by the Vernal Field Office for years and have become an	

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National Forest			<p>a Forest Service oil/gas development proposal was done for an Ashley National Forest oil and gas proposal south of Duchesne (http://www.fs.fed.us/r4/ashley/projects/1_sowers_seismic_and%20Well_ex_03_05.pdf). The BLM is welcome to photocopy project record references on file at the Ashley National Forest. The Vernal BLM Castle Peak-Eight Mile EIS identified quantitatively that motor mufflers on pump jacks can reduce noise considerably; could this information be used for noise stipulations in Appendix K?</p>	accepted practice.	
USFS— Ashley National Forest	G-19	AQ103	<p>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 (www.utahsmp.net/GRAPHICS/UTAIRS1.jpg).</p>	<p>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:</p> <p>“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.”</p>	X
USFS— Ashley National Forest	G-19	AQ104	<p>Please add discussion of additional relevant regulations and policies regarding air quality, such as the EPA Clean Air Rules of 2004, Utah Air Quality Rules, Wilderness Acts of 1964 and 1984 which</p>	See comment response AQ72.	

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			establish and govern air quality for the High Uintas Wilderness (south slope Uintas), and the Memorandum of Understanding and associated documents from the Federal Leadership Forum for oil and gas air quality NEPA, in which BLM is a partner. A summary of these (also prepared for the Ashley NF oil/gas review south of Duchesne, referenced above) is provided for your convenience.		
USFS— Ashley National Forest	G-19	AQ105	In Chapter 4, please evaluate compliance with applicable regulations, including any BLM internal manual or policy direction.	Model results are compared to the NAAQS and State AAQS. The BLM Soil, Water and Air Program Manual is currently under revision and should be available for discussion in future air quality analyses.	
USFS— Ashley National Forest	G-19	AQ106	Please include recognition of the Wilderness Acts (1984, 1964) and High Uintas Wilderness (e.g., in a paragraph following the National Park Service requirements), in addition to identifying these in Table 3.2.5 (p. 3-7). The Air Quality Assessment Report (Trinity, 8/04) states that there are no laws governing air quality in the High Uintas Wilderness. The Clean Air Act (and State implementing regulations) has provisions which apply across the entire State of Utah – including Class II airsheds, with additional restrictions for specific areas of non-attainment (non-attainment areas) and federally mandated Class I areas.	Although no section is referenced, BLM believes the commenter is referring to Section 5.4.2 of the TSD which states that Class II areas have “no visibility protection under local, State, or Federal laws.” The BLM believes this is still the case.	
USFS— Ashley National Forest	G-19	AQ107	Additionally, the Wilderness Acts governing the High Uintas Wilderness protect all resources including air quality. In management, the visibility standard of a “just noticeable change” of 1dv with a trigger for examination at 0.5 dv due to varying sensitivities of areas would apply to the High Uintas Wilderness even though it is a Class II airshed under the Clean Air Act. The air quality discussion in the RMP focuses on standards which do not encompass all pollutants	See comment responses AQ49 and AQ106. BLM included all pollutants in the air quality analysis which are generally included in NEPA air quality analyses and for which there are widely recognized metrics. BLM would welcome discussions on inclusion of	

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			affecting Air Quality Related Values of the High Uintas Wilderness. For example, NAAQS addresses NO ₂ but not NO ₃ and other nitrogen oxides contributing to the Air Quality Related Values (AQRV). The High Uintas Wilderness is in the same State defined airshed as most of the oil and gas development (www.utahsmp.net/GRAPHICS/UTAIRS1.jpg).	additional pollutants in future analyses.	
USFS— Ashley National Forest	G-19	AQ108	EPA regulates Hazardous Air Pollutants (HAPs) in addition to other pollutants. The discussion on p. 3-5 suggests that the Clean Air Act is fully implemented if NAAQS are met, which is not the case. Ref: Federal Register June 17, 1999. EPA 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants: Oil and Natural Gas Production and Natural Gas Transmission and Storage; Final Rule and other EPA rules.	Section 112(a)(1) of the Act defines a major source as: “any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential-to-emit considering controls, in the aggregate 10 tons per year (tpy) or more of any HAP or 25 tpy or more of any combination of HAPs.” There is no source included in the analysis would qualify as a major source under this regulation. Therefore, the NESHAP for Oil and Natural Gas Production is not applicable for this air quality analysis.	
USFS— Ashley National Forest	G-19	AQ109	Table 3.2.6, Background Concentrations for Vernal RMP Area, is the basis for analysis in Chapter 4 and focuses on 4 national criteria pollutants for various time periods. The units are in ug/m ³ (ambient concentration), which helps evaluate NAAQS standards but which is not helpful in comparing to data in Tons/Year (emissions) or in comparing to Tons/Acre or kg/ha/year (deposition).	Table 3.2.6 in the Draft RMP only presents background air concentrations. This table is now identified as Table 3.2.4 in the PRMP/FEIS. Data related to atmospheric deposition and emissions can be found in the Air Quality Technical Support Document.	
USFS— Ashley National Forest	G-19	AQ110	Table 3.2.6, Background Concentrations for Vernal RMP Area, appears to be based on estimates provided by Utah DEQ and a 12-year old application for	This data was provided by the Utah DEQ-AQD. BLM defers the selection of background air quality data to the appropriate State air quality agency.	

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Forest			Bonanza PSD; please consider use of more current and more accurate data presented or available for background estimates. Also, this information would be more useful in Chapter 3 as it is part of the "Affected Environment".	This table is now identified as Table 3.2.4 in the PRMP/FEIS, and remains as part of Chapter 3, Affected Environment.	
USFS— Ashley National Forest	G-19	AQ111	The background estimates are orders of magnitude of 1-10 (values 5-6,984 ug/m ³), yet the modeling in the Air Quality Assessment Report exhaustively looked at components of individual sources to 4 or more decimal places (Appendix C). Adding such detailed quantities to an estimated "lump sum" appears to be a discrepancy in orders of magnitude in the analysis. Please check the U.S. website for measured pollutants for area sources, some of which appear to have been used in the Air Quality Assessment Report (Trinity, 8/04; see samples enclosed). Rather than using a baseline from broad estimates, and adding to them detailed information calculated from EPA, it would seem a stronger baseline to sum the more current EPA data (ca. 1999, http://www.epa.gov/air/data/geosel.html) which), and then add the detailed "inventory sources" since that date for Chapter 3/baseline. Adding the BLM proposed sources for direct/indirect effects (Chapter 4) would then be done, along with adding the Tribal, private and Forest Service proposed sources for cumulative effects. This would resolve the differences in orders of magnitude and avoid combining data at 100-10 with data at the scale of 10-3.	Clarification of this comment is needed to properly respond. It is typical of large-scale air analyses that background concentrations range over several orders of magnitude. Also many of the sources listed in Appendix C were screened out for a number of reasons and are as provided to Trinity by the State air quality agencies.	
USFS— Ashley National Forest	G-19	AQ112	3.2.4.2 Criteria for Prevention of Significant Deterioration (PSD) Table 3.2.5 – Sensitive Areas to be Considered in the Analysis (p. 3-7). Inclusion of the High Uintas Wilderness in this table is appreciated. The Flaming	The Flaming Gorge National Recreation Area is included in Table 3.2.5 of the Draft RMP. This table is now identified as Table 3.2.3 in the PRMP/FEIS. The Flaming Gorge NRA was included in the effects analysis.	

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			Gorge National Recreation Area should also be included (as in 3.2.4.3), as the Ashley National Forest Land and Resource Management Plan includes air quality considerations for this NRA. In Section 3.2.5 (Consistency with Non-Bureau Plans – U.S. Forest Service), please include these two areas and address potential effects in Chapter 4 (effects analysis).		
USFS— Ashley National Forest	G-19	AQ113	<p>3.2.4.3 Visibility Criteria</p> <p>Visibility is an air quality related value under the Wilderness Acts establishing and governing the High Uintas Wilderness, which should be identified in this section. The inclusion of the Flaming Gorge NRA is appreciated. In Section 3.2.5 (Consistency with Non-Bureau Plans – U.S. Forest Service), please include these two areas and potential effects discussed in Chapter 4 (effects analysis).</p>	The High Uintas Wilderness is a Class II area which does not have visibility protection under State or Federal law. However, the High Uintas is included in the screening visibility analysis. See Tables 5-56 to 5-60 in the Air Quality Assessment Report.	
USFS— Ashley National Forest	G-19	AQ114	<p>4.2.2.2 Effects of SOIL AND WATERSHED, Special Designations, Recreation Management, and Wildlife and Fisheries Management Decisions</p> <p>Paragraph 1 identifies these uses as having “negligible effects on short-term air quality and negligible to incrementally positive effects on long-term air quality” (p. 4-7). However, recreation management which includes use of motorized vehicles (on – or off-road) can create considerable dust clouds in some soil types.</p>	While not explicitly modeled, these sources were considered in making this statement.	
USFS— Ashley National Forest	G-19	AQ115	4.2.2.3 Effects of LIVESTOCK GRAZING, Rangeland Improvement, RIPARIAN MANAGEMENT, Vegetative Management, and Woodland and Forest Management Decisions	See comment response AQ114.	

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			As in 4.2.2.2, vehicle uses or other ground-disturbing activities in some soil types can affect air quality as well as water quality.		
USFS— Ashley National Forest	G-19	AQ116	Effects of MINERAL DECISIONS on Air Quality If only emission sources developed after 2000/2001 were modeled to determine impacts to nitrogen/sulfur deposition, visibility, and/or lake acidity (ANC), then this assessment may underestimate existing air quality impacts.	See comment response AQ101.	
USFS— Ashley National Forest	G-19	AQ117	No noise assessment is provided. With the amount and density of oil/gas and related development proposed in all alternatives, a noise analysis and effects to wildlife, recreation, and/or other uses would be relevant. A copy of a Forest Service NEPA write-up for a small oil/gas proposal (as an example) is available on the Ashley NF website at http://www.fs.fed.us/r4/ashley/projects/1_sowers_seismic_and%20Well_ex_03_05.pdf with additional materials available from the Forest. The BLM is welcome to photocopy project record materials on file at the Ashley National Forest.	The BLM thanks the FS for the noise reference. See comment response AQ102.	
USFS— Ashley National Forest	G-19	AQ118	Mitigation to minimize air pollution effects is not presented until p. 4-25 (Section 4.2.3) and appears incomplete relative to mitigation available for oil and gas technology. Mitigation in addition to the items on page 4-25/26 and in addition to minimum regulatory requirements could help reduce air pollution. For example: Regarding type of engines allowed or encouraged, the Clean Air Rules of 2004, Non-road Diesel, identify the differences in air pollution between new and old engines and provide technological air quality improvements. Mitigation could specify or	The BLM appreciates the extensive information provided by the FS. However, BLM does not discuss mitigation of potential air quality impacts when there are no potentially significant impacts that require mitigation.	

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			<p>encourage use of cleaner engines.</p> <p>Where electrification is not available, operators could install large compressor engines with NOx emissions of 1.0 g/hp-hr or less; operators could use natural gas-fired engines to power drill rigs and associated equipment to further reduce NOx emissions. (For additional mitigation possibilities for small and large compressor engines, please consider technologies and emission factors identified by the Wyoming DEQ minor source regulatory program.)</p> <p>Operators should schedule and carry out regular inspection and maintenance to prevent emission leaks.</p> <p>Specific air quality monitoring could be required of the oil/gas industry in accordance with State of Utah; this may be conducted in coordination with the Forest Service, National Park Service, or other agencies or entities. There is precedent for this in Utah and Wyoming, where oil industry has paid for air quality monitoring stations and data collection. NADP, CASTNET, IMPROVE, or other air quality monitoring stations can be set up and monitored in cooperation with the State of Utah and local agencies.</p> <p>Incorporation of recommendations in Oil and Gas Surface Operating Standards for Oil and Gas Exploration and Development prepared by USDI-BLM and USDA-Forest Service (3rd Ed, 1989)</p> <p>Incorporation of USDI-BLM Production Operations – Best Management Practices for Fluid Minerals and</p>		

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			<p>USDI-BLM Best Management Practice Information Sheets (on BLM website).</p> <p>Incorporation of recommendations in the U.S. Government Accountability Office (GAO) 2004 report, Natural Gas Flaring and Venting: Opportunities to Improve Data and Reduce Emissions Produced water management recommendations in U.S. Department of Energy (2004) "A White Paper Describing Produced Water from Production of Crude Oil, Natural Gas, and Coal Bed Methane</p> <p>Incorporation of the over 100 BMPs identified by EPA through its National Gas STAR Program which involved 65% of the U.S. natural gas industry. Pneumatic devices and compressors were the largest pollution sources; 15 practices and technologies are presented to reduce these emissions. Participants in the STAR program reported reductions of over 275 billion cubic feet worth over \$825 million which is enough to heat over 4 million homes for 1 year or remove 24 million cars from U.S. highways for 1 year (referenced in GAO report).</p> <p>Use of "green completion" technology in lieu of flaring which has been successfully used in the Pinedale Anticline oil field development area. The RMP currently has no direction to encourage, consider, or require such technology in lieu of flaring. With the amount of flaring anticipated from this RMP, the difference to air quality could be significant, both in the vicinity of individual wells and cumulatively regarding the High Uintas Wilderness and Flaming Gorge NRA. In addition to these areas, there are Research National Areas on the Ashley National Forest which could be susceptible to air pollution. Questar and Shell have</p>		

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			been two leaders in “green completion” technology, which has been cost-effective to them, and they are encouraging other producers to follow suit.		
USFS— Ashley National Forest	G-19	AQ119	The effects analysis considers many regulated pollutants but is limited regarding some pollutants affecting High Uintas Wilderness air quality related values (AQRV, protected under the Wilderness Acts). For example, NAAQS addresses NO ₂ and SO ₂ but not SO ₄ , NO ₃ and other nitrogen oxides contributing to the impacts on AQRVs. Similarly, AQRVs at Flaming Gorge NRA could be affected by more pollutants than addressed by NAAQS.	See comment response AQ107. The CalPuff model does attempt to account these secondary pollutants (and others) with several chemistry modules available in the model.	
USFS— Ashley National Forest	G-19	AQ120	Paragraph 2 states that “The best available air quality monitoring data collected near the VPA were used to compare changes in air quality contributed by the modeled emission sources.” Please refer to comments above for 3.2.2 Baseline Air Quality and enclosures regarding the availability of additional local data for some pollutants.	See comment response AQ101.	
USFS— Ashley National Forest	G-19	AQ121	Particulate Matter – PM ₁₀ and PM _{2.5} . Some soil types (such as those high in Mancos shale) would be more likely to have air quality effects since they produce large amounts of dust that can linger in the air. These soils are also likely to be high in salinity; those areas near streams could contribute to 303(d) water bodies listed for salinity/TDS/chlorides. For these areas, the averages presented are potentially underestimated.	The emission factors used to calculate particulate matter emissions are assumed to be representative of the activities under consideration. At this point in time, fugitive dust calculations do not go to the level of detail mentioned in the comment (except perhaps in a research setting).	
USFS— Ashley National Forest	G-19	AQ122	In EPA’s facility monitoring website, http://www.epa.gov/air/data/geosel.html , individual wells in the RMP area had a wide range of pollutant discharges (T/yr). For example, see the comparisons	Without specifics about the information presented, no response can be made. For this analysis, the number of wells and pads associated with each alternative were used to calculate emissions and	

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			below. Multiplying the larger amount, or even an average, suggests voluminous annual increases in pollution. It is uncertain from the Air Quality Assessment Report and the RMP which scale of values was used in the analysis. Because different assumptions could yield large variations in projected potential impacts when multiplied by the number of proposed wells (6000+), please clarify the assumptions in the analysis.	compression requirements, using emissions factors as proposed in the modeling protocol or factors taken from commonly acceptable sources such as EPA's AP-42.	
USFS— Ashley National Forest	G-19	AQ123	3. Hazardous Air Pollutants (HAPs). a. The MLE/MEI analyses for health concerns (p. 4-14) considered the additional (“incremental”) emissions from BLM sources only – excluding background. However, health risks would be a result of the marginal BLM-induced increases PLUS the background. Please include both so it reflects a more complete health risk analysis	The incremental (project only) risk methodology used in the air quality analysis was proposed in the modeling protocol and accepted by the stakeholders group. Additionally, the background data recommended by the CDPHE were collected in an urban environment and are possibly overestimates of actual rural background concentrations.	
USFS— Ashley National Forest	G-19	AQ124	b. It is stated that “neither the State of Utah nor EPA have established HAP standards.” However, EPA does regulate HAPs and States have the option of being more stringent (such as Wyoming has done for the Pinedale Anticline area). Refer to Federal Register June 17, 1999, 40 CFR Part 63, EPA National Emission Standards for Hazardous Air Pollutants: Oil and Natural Gas Production and Natural Gas Transmission and Storage; Final Rule. This document addresses 188 HAPs; oil and gas natural production facilities were identified as a category of major sources (glycol dehydration units, natural gas transmission & storage were included).	See comment response AQ108 regarding NESHAPS regulations.	
USFS— Ashley National	G-19	AQ125	Paragraph 3 states that “The best available air quality monitoring data collected near the VPA were used to compare changes in air quality contributed by modeled	See comment response AQ101.	

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Forest			emission sources.” Please refer to comments above for 3.2.2 Baseline Air Quality and enclosures regarding the availability of additional local data for some pollutants.		
USFS— Ashley National Forest	G-19	AQ126	The effects analysis considers many regulated pollutants but is limited regarding some pollutants affecting High Uintas Wilderness air quality related values (AQRV, protected under the Wilderness Acts). For example, NAAQS addresses NO2 but not NO3 and other nitrogen oxides contributing to the impacts on AQRVs. The assurance that acid-sensitive lakes would not have more than a 10% change over time (cumulatively from this and other influences) is not assured. Similarly, AQRVs at Flaming Gorge NRA could be affected by more pollutants than addressed by NAAQS. Please include discussion of non-NAAQS pollutants that would affect the AQRVs.	From Section 3.9 of the Air Quality TSD: “Gas-phase dry deposition fluxes were modeled for SO2, NOx, and HNO3. Particulate-phase dry deposition was modeled for SO4, NO3, PM2.5, and PM10. Wet deposition was modeled for SO2, SO4, HNO3, and NO3. Results are reported in total (wet + dry) sulfur and nitrogen deposition.”	
USFS— Ashley National Forest	G-19	AQ127	The project life of BLM emissions sources was considered to be 15 years. Oil and gas developments can commonly extend past 30 years.	The Life of Plan (LOP) of 15 years was provided by the BLM Vernal FO. Also, this is a Resource Management Plan covering a number of different resources, all of which are taken into account in choosing the LOP.	
USFS— Ashley National Forest	G-19	AQ128	Hazardous Air Pollutants (HAPs). a. Please clarify why data was modeled from Grand Junction, CO rather than using local data to establish baseline conditions. Are local hazardous air pollution emission estimates for the area available on the EPA website (http://www.epa.gov/air/data/geosel.html or elsewhere)?	This data was recommended by Ms. Nancy Chick of the CDPHE (taken from EPA Urban Air Toxics Pilot Project, Grand Junction, CO) and was provided to Trinity Consultants. Also see comment response AQ110.	
USFS— Ashley National	G-19	AQ129	VOLATILE ORGANIC COMPOUNDS (VOCs) I did not find any discussion of VOC pollutants. EPA	VOC emissions were estimated for glycol dehydrators.	

Air Quality

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Forest			has recently (11/04) changed the definition of which compounds are considered VOCs. A public hearing will be held on May 24 in Salt Lake City regarding Utah's proposal to amend the State definition to match the new federal definition.		
USFS—Ashley National Forest	G-19	AQ130	Paragraph 2 – other sulfur and nitrogen compounds (not just sulfate and nitrate) also contribute to visibility effects; not all compounds affecting visibility are reflected in NAAQS. Does this analysis consider all contributing compounds?	In addition to nitrate and sulfate, visibility impacts also included fine particulate matter and coarse particulate matter.	
USFS—Ashley National Forest	G-19	AQ131	Paragraph 3 – A 1.0 dv change -- with a 0.5 dv trigger for investigation relative to the sensitivity of some environments -- is also applied to the High Uintas Wilderness area as it is under the same Wilderness Act protection as Class I Wilderness areas.	See comment responses AQ106 and 107.	
USFS—Ashley National Forest	G-19	AQ132	In EPA's facility monitoring website, http://www.epa.gov/air/data/geosel.html , individual wells in the RMP area had a wide range of pollutant discharges (T/yr). For example, see the comparisons below. Multiplying the larger amount, or even an average, suggests voluminous annual increases in pollution. It is uncertain from the Air Quality Assessment Report and the RMP which scale of values was used in the analysis. Because different assumptions could yield large variations in projected potential impacts when multiplied by the number of proposed wells (6000+), please clarify the assumptions in the analysis.	See comment response AQ122.	
USFS—Ashley National Forest	G-19 G-19	AQ133	(pp. 4-22 to 4-24 and 4-27/28) Visibility, Deposition If these analyses consider only BLM inputs, then please also display the result when these are added to baseline in order to determine effects on High Uintas	This section describes the impacts of the alternatives, which includes BLM sources only. See comment response AQ76.	

Air Quality

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			Wilderness air quality (and other cumulative effects). As explained earlier, some USGS modeling suggests that the High Uintas Wilderness has already reached 4-6 kg/ha/yr sulfur.		
USFS— Ashley National Forest	G-19	AQ134	There appear to be discrepancies between Table 4.2.5 and the Air Quality Assessment Report (Trinity, 8/04) findings. The following are in the Trinity report but not reflected in the EIS: at least 1 day >5% would occur in the High Uintas Wilderness (pp. 104-108, Trinity report) under Alternative A, B or D (compared to 0 baseline). The narrative (p. 92) 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.”	The BLM NSTC Air Quality staff does not believe that the 0.5 dv is a “just noticeable change” in visibility. See comment response AQ49. As a courtesy to the FS, BLM includes results compared to the 0.5 dv threshold, but only in the TSD.	
USFS— Ashley National Forest	G-19	AQ135	Under Alternatives B, C, and D, the Flaming Gorge NRA would experience a 33% increase in nitrogen deposition from baseline + VMA proposed activities (0.003 to 0.004 kg/ha/yr, p. 98) Under Alternative A, the Flaming Gorge NRA would experience a 33% increase in sulfur deposition from baseline + VMA proposed sources (0.003 to 0.004 kg/ha/yr, p. 99) and the same increase for nitrogen (p. 100). These are not considered “none to negligible” effects by the USFS.	The basis for the qualitative categories for the deposition results is based on comparison to the Fox vales of 3 kilograms per hectare per year (kg/ha/yr) for total sulfur and 5 kg/ha/yr for total nitrogen.	
USFS— Ashley National Forest	G-19	AQ136	It does not appear that the acid-sensitive lakes of the High Uintas Wilderness were any of the “lakes considered” since the Air Quality Assessment Report (p. 92) seems to indicate that the only lakes evaluated were in Colorado (Maroon Bells, Flat Tops and Mt. Zirkel Wilderness Areas, p. 110 & p. 114-cumulative	The sensitive areas (including lakes) selected for the analysis were proposed by the BLM, with several additions requested by the FS and NPS representatives at the stakeholder (protocol development) meetings. Additional sensitive receptors cannot be added at this point in the NEPA	

Air Quality

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			effects). Please include High Uintas Wilderness lakes and conduct this analysis; the BLM is welcome to ANC or other data from Ashley NF files.	process.	
USFS— Ashley National Forest	G-19	AQ137	Results in this table are presented qualitatively (“negligible”, “none”) rather than quantitatively. This applies a value judgment prior to presentation of objective data; the quantitative data is needed to evaluate significance by the reader. Please provide the data.	Section 4.2.2.6 [Far Field Analysis] in the PRMP/FEIS presents the quantitative results by alternative.	
USFS— Ashley National Forest	G-19	AQ138	The DEIS does not clearly identify the spatial and temporal boundaries and their rationale for the cumulative effects analysis.	Details of the air quality analysis are presented in the TSD (See sections 3.3.1 and 3.4).	
USFS— Ashley National Forest	G-19	AQ139	Does whether [sic] the cumulative effects analysis includes all past, present and reasonably foreseeable development including that which has been accomplished or proposed on Tribal, private, State, and National Forest System lands? These all should be considered in cumulative effects analysis. The “baseline” air quality, if accurate, would reflect existing conditions. In addition, there have been proposals for oil/gas development on other land ownerships which are very dense in some areas (e.g., Tribal). A single proposal currently being evaluated by the Bureau of Indian Affairs in the Sowers Canyon area (south of Duchesne) is up to 200 wells (Berry Petroleum). Please also include potential oil-shale development; some oil-shale development may meet the criteria for reasonably foreseeable sources.	BLM makes every attempt to include all sources that should be included explicitly in the air quality modeling. It should also be understood that the NEPA process (for projects that require a large-scale, multi-resource analysis) takes place over a number of years. Hence, projects may become reasonable foreseeable during the process at a point where they cannot be included in the on-going analysis without redoing the entire analysis, which would come at great expense and cause delays of months. For air quality analyses, a project or source that is thought to be reasonably foreseeable must have sufficient information available to calculate emissions and to be included in the modeling.	
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:	Table 4.2.7 in the PRMP/FEIS has been revised so that it is consistent with the TSD.	X

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			At least 1 day >5% would occur in the High Uintas Wilderness and Flaming Gorge NRA (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."	See comment response AQ134.	
USFS— Ashley National Forest	G-19	AQ141	The High Uintas Wilderness would experience as 12.5% increase in nitrogen deposition in all alternatives (increase from 0.004 to 0.0045 kg/ha/yr from BLM sources— this was rounded to 0.004 in the table but in fact is a difference). Flaming Gorge NRA would experience a 33% increase in nitrogen deposition in all alternatives (increase from 0.003 to 0.004 kg/ha/yr from BLM sources). These are not considered "none to negligible" effects by the USFS.	See comment response AQ135.	
USFS— Ashley National Forest	G-19	AQ142	Please explain why the visibility impact numbers presented in the Assessment Report (e.g., p. 104) are not additive across rows.	Because the maximum impact from the different sources may not have occurred at the same receptor.	
UBAOG	G-22	AQ146	Prescribed burns would be consistent with the State of Utah Division of Environmental Quality permitting process and timed so as to minimize smoke impacts. BLM should recognize that more fires must occur to regain natural ecosystem balance for fire prone systems and that air quality especially visibility in fire season will be diminished back to what it was naturally when fires were more frequent.	Comment noted.	
UBAOG	G-22	AQ147	Section 2.4.2 states that the VPA is an attainment or unclassifiable area for all pollutants. This statement refers to the National Ambient Air Quality Standards	See comment response to AQ89.	

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			(NAAQS) as set forth in 40 CFR 50 (50.4 through 50.12). Being in “attainment” means that current measured air quality values for the regulated pollutants do not exceed any of the NAAQS standards. Attainment is assessed on a pollutant by pollutant basis, and so an area can be attainment for one pollutant and be non-attainment for another. The nearest non-attainment area to the VPA is Utah County Utah which is considered non-attainment for CO. Unclassifiable means that there isn’t enough data to make a determination for a particular pollutant.		
UBAOG	G-22	AQ148	Section 2.4.2.2 mentions two areas that have the potential of impacting the VPA in relation to the NAAQS standards. Dust from construction activities and smoke from prescribed burns by the U.S. Forest Service and U.S. Bureau of Land Management. Since there are currently no particulate monitors operating in the area, neither of these activities should present a problem in the VPA.	The presence or absence of a monitor does not affect the potential impacts of a given activity.	
UBAOG	G-22	AQ96	BLM lacks authority to set the standards to identify desired future conditions. Achievement standards are set by the State of Utah and the EPA.	The BLM is not attempting to set ambient air quality standards. BLM recognizes the primacy of the State Air Quality agency and EPA to set air quality standards. This sentence applies to those criteria that BLM can control to influence future conditions.	
UBAOG	G-22	AQ97	The cancer related health risks are based on a worst case exposure scenario that isn’t even reasonable considering the remote location of the HAP emitting facilities.	The incremental risk assessment used two types of receptors, one of which is the “Maximally Exposed Individual (MEI)”. It is understood that this represents an upper-bound on possible incremental risks due to the conservative assumptions associated with this receptor.	
UBAOG	G-22	AQ98	This section reviews the visibility analysis and Section 4.2.2.6.7.5 reviews the deposition analysis. This modeling analysis consisted of only BLM sources. It should be noted that current modeling requests from	See comment response AQ76.	

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			EPA Region 8 require including all sources within a 200 KM radius from the source for deposition.		
UBAOG	G-22	AQ99	The cumulative effects to air quality associated with Alternative D should be less than the three action alternatives due to the prescribed burning of about 105,525 fewer acres of land over the next decade under Alternative D.	A whole range of source types are included in the cumulative analysis.	
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.	X
Utah DEQ – Division of Air Quality	G-31	AQ69	The current 8-hour ozone NAAQS is not included in this table.	See comment response AQ68.	
Utah DEQ – Division of Air Quality	G-31	AQ70	The values listed for the maximum concentration for all of the pollutants, but especially PM10, seem extremely low. Please provide the exact reference for each pollutant. These numbers appear to be averages instead of maximum monitored background concentrations.	See comment response AQ68.	
Utah DEQ – Division of Air Quality	G-31	AQ71	The current PM2.5 NAAQS and relevant maximum monitored background are not included in this table.	The significant criteria for potential air quality impacts include NAAQS requirements for CO, PM10, PM2.5, NO3, O3, and NO2/NOx. Applicable federal and state criteria are presented in Table 3.2.1 of the PRMP/FEIS.	
Utah DEQ – Division of Air Quality	G-31	AQ72	The following statement is incorrect: "The NAAQS represent maximum acceptable concentrations that generally may not be exceeded except annual standards, which may never be exceeded."	Section 3.2.3 in the PRMP/FEIS has been revised to read as follows: "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 (µg/m3). One measure of a pollutant is its concentration in comparison to a	X

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			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.	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 CRF 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 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."	
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)."	X
Utah DEQ –	G-31	AQ74	Ozone is not included in the table. Please include an	Ozone is appropriately excluded from this table, as	

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Division of Air Quality			analysis of ozone concentrations in the proposed location, and the subsequent impact on the NAAQS as a result of each of the Alternatives.	no ozone modeling analysis was performed. See comment responses AQ54 and AQ65.	
Utah DEQ – Division of Air Quality	G-31	AQ75	The DRMP-EIS has not addressed all of the NAAQS; an ozone analysis has not been presented.	See comment responses AQ54, AQ65, and AQ74.	
Utah DEQ – Division of Air Quality	G-31	AQ76	The following statement is not supported by the DRMP-EIS: "With the exception of prescribed fire, impacts from management decisions related to the proposed development alternatives are projected to have no effect to a negligible effect on air quality in those regions where they are implemented." A cumulative air quality analysis has not been included in the DRMP-EIS. One project may have a small, albeit, negligible effect on air quality, however several of the alternatives approach listing 6300 projects, and it is reasonable to assume that collectively these projects might impact the quality of the air.	Section 4.2.4 in the PRMP/FEIS describes the cumulative impacts regarding air quality.	
Utah DEQ – Division of Air Quality	G-31	AQ77	In regards to increment calculations, the major and minor PSD datelines [sic] have been established for the DRMP-EIS area, and therefore, minor sources consume increment and must be included in any discussion regarding increment consumption.	This NEPA analysis compared potential air quality impacts from the proposed Alternatives to applicable ambient air quality standards and PSD increments. The comparisons to the PSD Class I and II increments were intended to evaluate a threshold of concern for potential impacts, and do not represent a regulatory PSD Increment Consumption Analysis. Such a regulatory analysis is the responsibility of the State air quality agency (under EPA oversight) and could be conducted during permitting process. Therefore, PSD Baseline dates are not relevant.	
Utah DEQ – Division of Air Quality	G-31	AQ78	Please include a description of the policy, rules and procedures that the BLM implements to minimize the air quality impacts and specifically impacts to regional	Section 4.2.2.5 in the PRMP/FEIS describes the effects of fire decision on air quality. This section also describes how the public is notified during a fire	

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			haze for fire events. Also include a discussion of the procedures the notifying the public regarding specific fire events.	event.	
Utah DEQ – Division of Air Quality	G-31	AQ79	The Utah Division of Air Quality (UDAQ) requested a copy of the Air Quality Modeling Analysis cited in the DRMP-EIS on February 7, 2005. UDAQ cannot conduct a thorough review of the DRMP-EIS without the modeling analysis, and as such, all comments submitted here are considered preliminary (cited as Air Quality Technical Support Document, Trinity and Nichol [sic] 2004.)	According to Jerry Kenczka of BLM's Vernal FO, the UDAQ was sent the requested material with sufficient time to submit comments.	
Utah DEQ – Division of Air Quality	G-31	AQ80	The DRMP-EIS states, "PSD increments do not apply, as a majority of these sources are temporary in nature." Please provide supporting documentation. It is difficult to determine what projects are being considered for the statement. Process fugitive emissions attributable to a stationary source do consume increment and must be included in the analysis.	See comment response AQ77. The air quality analysis done for the Vernal RMP DEIS should not in any way be interpreted as a regulatory PSD ICA. This type of analysis would be conducted by the appropriate, delegated air quality agency.	
Utah DEQ – Division of Air Quality	G-31	AQ81	UDAQ is not familiar with "monitoring baseline date," or why it would support the conclusion that since a source was operating at the time of the monitoring date, it was assumed to be included in the background concentration of a pollutant. As mentioned in other discussions in the DRMP-EIS, there is very little actual air quality monitoring data that exists within the study area. A PSD modeling analysis must include emissions from sources that would impact the study area at the 1ug/m3 level. The analysis must be redone using standard modeling procedures, which would include modeling the emissions from nearby sources. Also, since the major and minor PSD baseline dates have been established for the DRMP-EIS area, minor sources consume increment and must be included in all increment calculations.	See comment responses AQ32 and AQ34 regarding the modeling base year date approach and comment response AQ77 and AQ80 regarding PSD.	

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Utah DEQ – Division of Air Quality	G-31	AQ82	The information supplied in the DRMP-EIS does not support the conclusions presented in this table. The DRMP-EIS did not conduct an air quality cumulative impact analysis for the different alternatives.	A cumulative analysis was conducted as part of the air quality analysis. The BLM believes there is ample basis for the information presented in this table.	
US EPA Region VIII	G-32	AQ83	Cumulative Air Quality Impacts of Reasonably Foreseeable Future Actions: Significant cumulative visibility impairment associated with mineral and energy development was identified. The Draft EIS describes the inventory sources and BLM sources and the Technical Support Document for Air Quality provides more information on how these sources were modeled. Background concentrations were added to the emissions associated with reasonably foreseeable development and the impacts of Alternative B to estimate potential cumulative air quality impacts. The Draft EIS concludes that the existing emissions, when combined with emissions from Reasonably Foreseeable Future Actions (RFFA) would cause only negligible air quality impacts. However, the air quality analysis may provide a low estimate of the potential emissions of nitrogen oxides (NOx) from energy construction and production within the “Indian Country” that comprises a large portion of the Vernal Planning Area. We suggest that actual emission rates from within Indian Country be assessed and used to describe a range of potential emissions from construction and production activities from these sources.	The existing “Indian Country” sources would be represented by the background air quality data and thus not explicitly modeled.	
US EPA Region VIII	G-32	AQ84	We also suggest several additional reasonable foreseeable future sources of air emissions in the West Tavaputs Plateau area be included in a revised air quality modeling assessment once those projects are adequately defined. For example, in 2004, Petroglyph Oil and Gas Company proposed 8008 steam injection wells on 2.5 acre spacing in the Antelope Field. This	The BLM thanks EPA for the information provided. These projects will be included for consideration in future projects should they become reasonably foreseeable.	

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			<p>proposed plan for oil development using steam recovery was submitted to the Bureau of Indian Affairs in 2004 and it includes the estimated emissions of some pollutants. This oil and gas development project could be reasonable foreseeable if the 288 well pilot project currently under development proves to be economically and technically feasible. Further, in 2001, the Northern Ute tribe leased 83,000 acres to the Dominion Exploration and Production, Inc. on lands known as Naval Oil Shale Reserve No. 2. This land is adjacent to the Green River and is surrounded by lands currently producing gas reserves from the Uinta Basin geologic section. When these plans are formulated the projects may also need to be considered RFD.</p>		
US EPA Region VIII	G-32	AQ85	<p>Nitrogen oxide emission rates in Indian Country.</p> <p>The near-field modeling analyses for the Draft EIS used the NOx emission rates of either 1.5 gram per horsepower-hour (g/hp-hr) or 0.7 g/hp-hr for the Utah-permitted new compressor engines. However, many compressor engines associated with the RFFA may be located on Indian country lands within the exterior boundaries of the Uintah and Ouray Indian Reservation. Such sources will be subject to the requirements of EPA as the permitting and regulatory authority. It is likely that many of the new compressor engines added as a RFFA with "Indian Country" will be considered minor sources under the Clean Air Act. Although EPA is considering a rulemaking to allow air permits for minor sources in Indian country, it is not clear at this time how many new compressor engines would be required to obtain an air quality permit. If no permit is required, the assumption of restricting NOx emission limits within the range assumed for the air</p>	BLM is always willing to cooperate with EPA on NEPA air quality analyses and we hope to do so in the future.	

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			<p>quality cannot be assured. We suggest that BLM assisted by EPA evaluate NOx emission rates of recently installed compressor engines in Indian Country on the Uintah and Ouray Reservation in order to establish the range of emissions to be used for RFFA with Indian Country. Information available to EPA indicates that field compressor engines on the Uintah and Ouray Reservation emit NOx in the range of 2 to 28 g/hp-hr. This information would then be used in a revised air quality modeling effort for future NEPA analysis of large-scale energy projects with the Vernal Planning Area.</p>		
US EPA Region VIII	G-32	AQ86	<p>Visibility.</p> <p>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 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</p>	<p>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.</p>	X

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			<p>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>		
US EPA Region VIII	G-32	AQ87	<p>Ozone.</p> <p>The DEIS mentions ozone in the context of prescribed burning. Table 3.2.3 lists the criteria pollutants but excludes ozone.... Current development in the planning area includes sources of volatile organic compounds (VOC's) [sic] and oxides of nitrogen, which are ozone precursors. The model used by BLM for the air quality analysis (i.e., CALPUFF) was not suitable for estimating ozone impacts. However, we recommend that the FEIS address ozone and specify that project-level NEPA compliance documents will estimate potential ozone impacts.</p>	<p>Ozone is appropriately excluded from this table, as no ozone modeling analysis was performed. See comment responses AQ54 and AQ65.</p> <p>The CALPUFF model was proposed as the far-field model and was approved by the stakeholder group.</p> <p>As EPA noted in their comments on the Roan RMP DEIS air quality analysis:</p> <p>“Running a regulatory ozone model such as RPM-IV for purposes of the DEIS is impractical, and we understand that BLM’s National Science & Technology Center may be reluctant to estimate potential ozone impacts with a conservative method such as VOC/NOx point source screening tables.”</p> <p>Given the above, it is not clear how a possible ozone analysis would be done.</p>	
US EPA Region VIII	G-32	AQ88	Prescribed Fire.	See Section 4.2.2.5 in the PRMP/FEIS regarding prescribed burns.	

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			<p>We appreciate that the draft EIS addressed the air quality effects of prescribed fire. We suggest that the FEIS indicate that project-level NEPA documents will be needed for prescribed fire treatments which can address EPA's Interim Air Quality Policy on Wildland and Prescribed Fires. The FEIS should also further analyze [sic] the need that project-level NEPA documents for prescribed fire address alternatives that meet the purpose but also minimize smoke and its impact, such as mechanical reduction of fuel build-up and for pre-treatment before burning, limiting the amount burned at any one time, and implementing hazard awareness and mitigation programs for the public.</p>		
US EPA Region VIII	G-32	AQ89	<p>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."</p>	<p>Section 3.2.2 in the PRMP/FEIS has been revised to make the change(s) as suggested. This section now reads as follows:</p> <p>"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)."</p>	X
US EPA Region VIII	G-32	AQ90	<p>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 pollutants from different air monitoring stations. In the case of PM10, Table 3.2.1 gives an annual concentration of 3.3 µg/m³, while Table 3.2.6 gives an annual concentration of 10 µg/m³. Table 3.2.1 gives an annual NO₂ concentration of 41 µg/m³</p>	See comment response AQ68.	

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			(0.022 ppm) and Table 3.2.6 gives an annual NO ₂ concentration of 10 µg/m ³ (0.005 ppm). Please revise the final EIS to clarify the reasons for using different sources of data.		
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.	X
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.	X
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 identifying carbon dioxide (CO ₂) as a criteria pollutant and include carbon monoxide (CO) as a criteria pollutant that wildland fires and prescribed fires emit.	Section 4.2.2.5.1.1 in the PRMP/FEIS has been revised to make the change(s) as suggested.	X
US EPA Region VIII	G-32	AQ94	Air Quality – Technical Support Document (Air Quality Assessment Report). 1) National Park Service Reference. Please correct the	The footnote to Table 3-24 in the TSD has been revised to make the change(s) as suggested.	X

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			date in the footnote to Table 3-24.		
US EPA Region VIII	G-32	AQ95	<p>Air Quality – Technical Support Document (Air Quality Assessment Report).</p> <p>2) Increment Comparison Results. The value for three-hour SO₂ 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.</p>	The TSD has been revised to make the change(s) as suggested.	X
Vicki Stamper	I-99	AQ10	EPA’s modeling guidelines generally call for an analysis of worst case impacts for new sources.	In BLM’s opinion, EPA’s Guideline on Air Quality Models (GAQM) does not call for a worst-case analysis for all modeling exercises. See comment responses AQ9 and AQ31. Furthermore, NEPA no longer requires a “worst-case” analysis.	
Vicki Stamper	I-99	AQ11	Under NEPA, the BLM is to provide a ‘full and fair discussion the significant environmental impacts’ that could occur as a part of the DRMP. Accordingly, the BLM should have considered topography in its near-field assessment and determined a hypothetical placing of wells and other associated air pollution sources that would result in worst case ambient impacts. The BLM’s air quality analyses are flawed with such consideration of the terrain of the Vernal Field Office area.	See comment response AQ9.	
Vicki Stamper	I-99	AQ12	The group of air pollution sources modeled in the near-field analysis was too small to reflect the maximum impacts that could occur. Specifically the BLM modeled only 25 well pads and associated air emissions sources. However, Appendix D of the August 2004 Air Quality Assessment Report for the Vernal and Glenwood Springs Resource Management Plans (2004 Air Report) indicates that 4,256 wells	The near-field analysis generally followed the accepted methodology from a previous analysis for the Glenwood area (NPS, 1998) performed for BLM. The near-field analysis was intended to look at impacts in the vicinity of a representative set of sources, and was not intended to be a cumulative analysis. The cumulative impacts analysis was performed with the CALPUFF model and the	

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			would be allowed under the Preferred Alternative A. The BLM's analysis only looked at less than 1% of the total development that could occur under the DRMP/EIS along with reasonably foreseeable gas development in the area.	appropriate BLM and inventory sources.	
Vicki Stamper	I-99	AQ13	Figure A-57 of Appendix A of the 2004 Air Report indicates that the area of significant impact (i.e., defined by EPA as the area with at least 1µg/m3 impact on an annual average) from just the sources modeled extends at least 3 kilometers away from the group of sources modeled (and probably farther than that but the distance could not be readily discerned from Figure A-57). Many additional groupings of wells and associated air emissions sources could be located in the significant impact area of the sources modeled, which would clearly compound the overall air pollutant concentrations.	<p>The commenter apparently misread the figure. This figure shows potential maximum near-field impacts of annual average NOx concentrations. The EPA Significant Impact Levels (SIL) were not a part of this graphic.</p> <p>EPA's SILs are intended for use in PSD permit analyses (EPA, 1991) and hence were not used in the near-field NEPA analysis. Also, the construction activities included in the near-field analysis are temporary in nature and thus, the comparison to the SILs is not applicable.</p>	
Vicki Stamper	I-99	AQ14	To determine whether ambient air quality standards will be violated due to the DRMP, a much larger and more extensive potential maximum emissions scenario should be developed and modeled, along with a consideration of topography of the Vernal Field Office are as discussed above.	<p>See comment responses AQ8, AQ9, and AQ12.</p> <p>BLM would welcome a cooperative, multi-agency ozone modeling exercise focused on oil and gas development in the Western U.S.</p>	
Vicki Stamper	I-99	AQ15	As stated in the definition of "Significantly" at 40 CFR § 1508.27, 'significance exists if it is reasonable to 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 CFR §§ 1502.1 and 1502.16, and thus the RMP/EIS must include an adequate analysis of the cumulative impacts on air quality.	<p>See comment responses AQ9 and AQ12.</p> <p>BLM's 2-tiered analysis approach does not "break [sic] [an action] down into small component parts" to avoid significance. The analysis addressed both the potential local (near-field) and distant (far-field), including a cumulative analysis.</p>	

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Vicki Stamper	I-99	AQ16	<p>The DRMP EIS Did Not Justify the NOx Emission Rate from Compressors Modeled in the Near Field Analysis. The near field modeling analyses for the DRMP/EIS assumed a NOx emission rate of 1.5 gram per horsepower-hour (g/hp-hr) for compressor engines. However, a large part of the Vernal Field Office area is within the exterior boundaries of the Uintah and Ouray Indian reservation and is actually considered to be in "Indian Country." As a result, sources locating in that region will be subject only to Federal new source permitting requirements with the Environmental Protection Agency as the permitting authority.</p> <p>Unfortunately, EPA only has preconstruction permit requirements for new and modified major stationary sources (i.e., the prevention of significant deterioration (PSD) permitting program). It is likely that many of the compressor engines added as a result of the Vernal RMP and other reasonably foreseeable development will not be subject to PSD permitting requirements because the engines will be considered minor sources. This means that no air quality permit will be required, no emission limits will be required, and no ambient air quality analysis will be required. Thus, there is no support for the concept that compressor engines in the Vernal Field Office area will be subject to a NOx emission rate of 1.5 g/hp-hr, much less the 0.7 g/hp-hr assumed for Utah sources in the CALPUFF analysis.... At a minimum, the BLM should have evaluated the NOx emission rates of recently installed compressor engines in "Indian Country" (quotes added) in the region, to get an idea of a reasonable NOx emission rate to model. Without adequate justification showing that the assumed 1.5 g/hp-hr NOx emission rate will actually apply or be met by most new compressor</p>	<p>See comment response AQ9 regarding worst-case analyses.</p> <p>It is not within BLM's authority to correct perceived weaknesses in State or Federal air quality regulations.</p>	

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			engines in the Vernal Field Office area, the BLM should have assumed the worst case NOx emission rate or, at the minimum, a more realistic NOx emission rate.		
Vicki Stamper	I-99	AQ17	<p>The Near-Field Analysis Used Different Compressor Stack Parameters than Used in the Far-Field Analysis, Which Likely Meant the NO2 Concentrations Were Underestimated in the Near-Field Analysis</p> <p>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 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.</p>	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.	X
Vicki Stamper	I-99	AQ18	The near-field analysis did not provide a thorough review of particulate matter impacts because it appears that the analysis underestimated particulate emissions from roads and from construction. There were 25 well pads assumed in the group of sources modeled in the near-field analysis and there will be a road going to each pad. Yet, the BLM only modeled emissions from one unpaved road traversing diagonally – the shortest distance - through the source area. Such an approach	All particulate emissions were accounted for in the modeling. Separate modeling runs were conducted for road emissions only at the request of EPA Region 8. All road emissions for the appropriate length of road associated with 25 pads were combined into the sources used to represent the single road; this reduces model run times.	

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			greatly underestimated the mileage of roads, which would result in an underestimate of emissions. This problem is magnified by the fact that the BLM did not model a large enough group of sources to adequately reflect maximum near field air impacts.	See comment response AQ9.	
Vicki Stamper	I-99	AQ19	The 2004 Air Report does not identify what the BLM assumed for vehicle miles traveled for the modeling of the unpaved road to determine whether a sufficient level of traffic was modeled.	This information was, and is, available on the 2-CD set containing the TSD and associated tables, attachments and appendices, and modeling files by request from the BLM NSTC.	
Vicki Stamper	I-99	AQ20	It appears that the well pad construction emissions were underestimated. It is difficult to determine precisely what was modeled, but it seems questionable whether the well pad construction emissions listed in Table 3-21 of the 2004 Air Report include emissions due to construction traffic on unpaved roads	Construction and construction vehicle traffic was included in the analyses	
Vicki Stamper	I-99	AQ21	Possibly the emissions only represent tailpipe particulate emissions?	Tailpipe emissions were not included in the analysis.	
Vicki Stamper	I-99	AQ22	As a comparison to the recently released Rawlins DRMP/EIS, the BLM used much higher emission factors for PM-10 emissions from well pad construction for the Rawlins analysis. Specifically, just the PM-10 emissions for road dust generated from construction equipment were estimated to be approximately 0.0227 grams per second in the Rawlins emissions inventory, whereas the BLM assumed PM-10 emissions from well pad construction and related traffic to be only 0.0000004946 grams per second for the Vernal DRMP analysis. (Information on well pad construction emissions was derived from the Rawlins "Emissions CD" associated with the Rawlins DRMP/EIS.)	No modeling was done for the Rawlins RMP EIS, so the accuracy of the stated figure for PM-10 emissions cannot be verified. The quoted emission rate from the Vernal analysis is in grams per second per square meter (g/s-m ²). Converting back to grams per second yields a figure of 0.004 g/s. Further, the Rawlins analysis has thousands more wells than the Roan Plateau analysis.	
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	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	X

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			<p>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.</p>	<p>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.</p>	
Vicki Stamper	I-99	AQ24	<p>The Near Field Analysis Failed to Include an Analysis of Impacts from Construction Vehicle Engines or Drilling Rigs</p> <p>The near-field analysis apparently did not evaluate the air impacts from construction vehicle engines or drilling rig engines. With respect to drilling rigs, the DRMP/EIS states that these sources were screened out as insignificant (page 4-35 of DRMP/EIS). Based on the data provided in 2004 Air Report, the BLM only evaluated particulate emissions from construction and drilling traffic. Table 3-21, page 35 of 2004 Air Report. (As stated above, it is not clear whether the analysis of traffic was of road dust particulate emissions or tailpipe emissions). Drilling rigs, as well as construction equipment, will most likely be powered by diesel engines, and thus emissions of SO₂, NO_x, and CO should have also been evaluated from these engines. The emissions inventory developed for the Rawlins DRMP/EIS shows significant emissions from drilling operations alone, as well as from other well pad construction equipment. The BLM should not have exempted these sources from the near-field analysis based on presumed insignificance. Further, as stated in the definition of "Significantly" in the NEPA regulations at 40 C.F.R. § 1508.27, "significance exists</p>	<p>Vehicle tailpipe emissions were not included in either the near- or far-field analyses. The drill rig engines were excluded based on preliminary emissions calculations performed by NSTC Air Quality staff. The near-field analysis is not and was not intended to be "cumulative analysis".</p>	

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			if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by. ..breaking [an action] down into small component parts." Thus, the DRMP/EIS is deficient in not evaluating all of the potential air impacts due to these sources.		
Vicki Stamper	I-99	AQ25	It appears that the BLM greatly underestimated the NOx emissions due to natural gas flaring for the Vernal DRMP/EIS. Specifically, the 2004 Air Report indicates that a NOx emission rate of 0.0098 grams per second was assumed for flaring emissions. (Table 3- 24, page 42 of 2004 Air Report). That emission rate, as with all other flaring emission rates, was based on emission rates from "NPS, 1988." For the recently released Rawlins DRMP/EIS, the BLM used much higher emission factors for NOx emissions from flaring. Specifically, the BLM used a NOx emission rate of approximately 0.0850 grams per second for flaring emissions for the Rawlins DRMP/EIS, which is more than eight times the emission rate assumed by the BLM in the Verna1 analysis. (Information on flaring emissions is detailed in the Rawlins "Emissions CD" associated with the Rawlins DRMP/EIS, and according to the documentation provided, the NOx emission rate was based on EPA's Compilation of Air Pollutant Emission Factors (AP-42), Volume I, section 13.5 Industrial Flares.)	The flare modeling was conducted as a separate exercise using the SCREEN3 model, as recommended during stakeholder meetings. The SCREEN3 model is a simple, single-source Gaussian plume model with a pre-determined matrix of meteorological conditions. The model is also linear with respect to emission rate. Therefore, a doubling of the modeled emission rate gives a doubling of the resulting concentrations. Examining the flare modeling results and the maximum concentrations listed in Table 5-73, an increase in emissions by a factor of eight, assuming such an exercise is valid, still yields extremely small concentrations. Therefore, further modeling is not required.	
Vicki Stamper	I-99	AQ26	The BLM did not estimate any volatile organic compound (VOC) emissions from flaring. Yet, for the Rawlins DRMP/EIS, the BLM estimated that VOC emissions based on 2 days of flaring would equate to 1,262 pounds of VOCs per well over a two day period. This is hardly an insignificant amount of emissions. The VOC emissions from flaring should have been estimated and the resulting potential impacts on air	Emission factors were taken from EPA's AP-42, volume 1, chapter 13.5, and did not include VOCs.	

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			<p>quality (including impacts on hazardous air pollutant concentrations) should have been evaluated. (Information on flaring VOC emissions is detailed in the Rawlins "Emissions CD" associated with the Rawlins DRMP/EIS). Thus, the flaring emissions and air analyses should have more accurately reflected NOx emissions and should have included an evaluation of VOC (including hazardous air pollutant) emissions.</p>		
Vicki Stamper	I-99	AQ27	<p>The estimate of the Number of Compressors 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</p>	<p>The commenter has misinterpreted Table A-4. 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>	X

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			<p>more 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.</p>		
Vicki Stamper	I-99	AQ28	<p>There appears to be a major miscalculation of the number of compressor engines that will be needed, considering the "rule of thumb" applied (as discussed on page 21 of the Air Report) that 1,100 horsepower (hp) is needed to move 10 million cubic feet per day (MCF/day) of gas and also considering that, currently, 28,000 hp is used (via 35 compressors) to move 225 MCF/day (as discussed in Tables D-7 through D-10).</p> <p>According to the calculations provided in the Air Report and Appendix D, under the preferred Alternative A, the maximum predicted gas production from all reasonably foreseeable development will be 226,265,311 MCF/year. This is equivalent to 619,905 MCF/day. Thus, the production is projected to rise to more than 1,000 times the amount of gas being produced in the basin today, yet the number of compressor engines at 1,000 hp each is only projected to increase by roughly 2.5 times the current horsepower used to move the current production of 225 MCF/day. This clearly makes no sense. Using the "rule of thumb," based on the projected gas production, the number of compressors needed for full development at 1,000 hp each would be over 68,000. It is not clear whether this result makes sense either and thus possibly the total maximum projection of gas production is in error?</p>	<p>The commenter has made 2 mistakes in the units of her calculation. First, the quote "10 million cubic feet per day (MCF/day)" should be 10,000 MCF/day. Second, the basin wide production quoted as 225 MCF/day should be 225 MMCF/day. (Note: A million is equivalent to MM and a thousand is equivalent to M.)</p> <p>Using the correct values, the calculation is as follows:</p> <p>$(1100 \text{ HP}/10,000\text{MCF per day}) * 619,905 = 68,189 \text{ HP}$ or 68 1000HP compressors.</p>	

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			<p>In any case, the estimate in the Air Report of the number of compressors needed for the maximum development scenario means that, considering the development of Alternative A of 4,265 wells (per Table D-8 of Appendix D of 2004 Air Report), there would be one compressor engine (of 1,000 hp) for every 63 wells. This does not seem sufficient, especially given current levels of development and current number of compressor engines. This also is much less conservative than the assumption for the near field analysis which assumed six 1,000 hp compressor engines for 25 well pads.</p> <p>Thus, the analysis of the total number of compressor engines needed for each alternative needs to be checked for errors and recalculated. As it currently stands, it appears that the estimate of compressor engines is greatly underestimated, which would then result in a significant underestimate of ambient air impacts due to these sources. The air quality analysis for the Vernal DRMP cannot be relied on until this issue is resolved.</p>		
Vicki Stamper	I-99	AQ29	<p>There is No Support for the Assumed NOx Emission Rate for Compressor Engines in the Vernal Field Office Area.</p> <p>According to the 2004 Air Report, the assumed for new compressors in Utah was 0.7 g/hp-hr, based on the "stringent [Best Available Control Technology] limits in Utah." (Page 22 of 2004 Air Report). However, Utah will not likely be the permitting authority for the majority of compressor engines permitted in the Vernal Field Office area because a large part of the Vernal Field</p>	<p>BLM used the 0.7 g/hp-hr NOx emission rate at the request of the Utah DEQ. BLM believes that using "uncontrolled NOx emissions from compressors in the Vernal Field Office area" would not be appropriate and not in accord with NEPA and CEQ regulations, which no longer require a "worst-case" analysis.</p>	

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			<p>Office area lies within the exterior boundaries of the Uintah and Ouray Indian Reservation, which means that the EPA will be the permitting authority and Federal, not Utah, permitting regulations will apply to most compressor engines in the area. As discussed above, EPA's preconstruction permit requirements only apply to new and modified major stationary sources (i.e., the PSD permitting program). It is likely that many of the compressor engines added as a result of the Vernal RMP and other reasonably foreseeable development will not be subject to PSD permitting requirements because the engines will be considered minor sources. This means that no air quality permit will be required, no emission limits will be required, and no ambient air quality analysis will be required. Thus, there is no support for the concept that compressor engines in the Vernal Field Office area will be subject to a strict NOx emission rate of 0.7 g/hp-hr. Indeed, the NOx emission rates from unpermitted compressor engines are likely to be several times greater than that assumed for the Vernal DRMP air quality analyses.</p> <p>The BLM should have evaluated the NOx emission rates of recently installed compressor engines in Indian Country in the region, to get an idea of a reasonable NOx emission rate to model. Without adequate justification showing that the assumed 0.7 gm/hp-hr NOx emission rate will actually apply or be met by most new compressor engines in the Vernal Field Office area, the BLM should have assumed uncontrolled NOx emissions from compressors in the Vernal Field Office area.</p>		
Vicki Stamper	I-99	AQ31	The CALPUFF Air Quality Modeling Analysis Failed to Model At Least Three Years or Meteorological Data as	EPA Guideline on Air Quality Models (GAQM) is just that; a guideline; it is not regulation. Further, the	

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			<p>Required by EPA Regulations.</p> <p>The CALPUFF air quality modeling analysis only used one year of mesoscale meteorological data from 1996. (Page 46 of the 2004 Air Report.) However, common practice and EPA's Guideline on Air Quality Models requires use of at least three years of mesoscale meteorological data or five years of National Weather Service (or comparable) data when evaluating long range transport of air emissions. See Section 9.3.1.2.d. of 40 C.F.R. Part 51, Appendix W. As stated in EPA's Guideline on Air Quality Models, "The model user should acquire enough meteorological data to ensure that worst-case meteorological conditions are adequately represented in the modeling results." (Section 9.3.1.1 of 40 C.F.R. Part 51, Appendix W.) EPA's recommendation to ensure this mandate is met is to use three years of mesoscale meteorological data or five years of other meteorological data to adequately reduce the variability in model estimates due to meteorological data. Thus, the BLM's CALPUFF air quality analysis does not meet these current standards for air quality modeling demonstrations.</p>	<p>GAQM is primarily intended for application in a regulatory setting and is not necessarily applicable to NEPA.</p>	
Vicki Stamper	I-99	AQ32	<p>The Use of Background Concentrations To Reflect Existing Source Impacts Is Flawed and Unjustifiable.</p> <p>The cumulative CALPUFF air quality analysis relied on background concentrations (which were not always based on monitored concentrations) in defining which sources needed to be inventoried and included in the modeling. (page 16 of the 2004 Air Report). That is, any source in existence and operating prior to the "monitoring baseline date" (which varies from 2000 to 2001) was generally considered to be reflected in the</p>	<p>The background data for the Vernal AQ analysis were provided by the Utah DEQ and represent, in the DEQ's opinion, the best available data to represent the existing air quality in the Vernal RMPA. The background air quality data, for this or most modeling analysis, are not intended to, nor should be "maximum pollutant concentrations", but are intended to be representative of the area under analysis.</p>	

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			<p>background monitoring data and thus was not inventoried or included in the cumulative modeling assessment. According to Table 5-3 of the 2004 Air Report, the data that were considered to reflect all sources in existence prior to 2000 or 2001 were either estimates from the Utah Division of Air Quality (UDAQ) or did not necessarily reflect maximum pollutant concentrations in the Vernal Field Office area. For example, for NO₂, a background concentration provided by UDAQ of 10 µg/m³ was used, although it is not clear how this concentration was derived. Similarly, a background concentration provided by UDAQ was used for PM-10 concentrations. For SO₂, data collected almost 10 years ago were used as reflecting existing sources, and for CO, data collected in Grand Junction, Colorado were used. To assume that any of this monitoring data or recommended background values are reflective of existing source impacts in the Vernal area or at the Class I areas modeled is farfetched without an analysis to indicate that the concentrations are reflective of the maximum concentrations for the Vernal project area and the other areas modeled.</p> <p>To justify the use of any monitoring data as reflective of maximum concentrations in an area, an analysis should have been done to show that the monitor in question is representative of maximum concentrations for the area based on existing stationary, mobile and area sources. Considering that the CALPUFF analysis was used to predict air impacts at various locations such as Class I areas, the monitoring data would have to be shown to be representative of maximum concentrations for all of those various locations as well. Further, the monitoring data should have been</p>		

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			evaluated to determine whether the monitors meet EPA's criteria in 40 C.F.R. Part 58 for site selection and sampling frequency, and whether the monitoring data has been quality assured and adjusted for missing data.		
Vicki Stamper	I-99	AQ33	Regarding the background concentrations recommended by UDAQ, it is not clear how these values could be considered as reflective of all existing sources in the region unless these background concentrations were derived from modeling all existing sources and reflect the existing sources' maximum impacts in all areas modeled.	See comment response AQ32.	
Vicki Stamper	I-99	AQ34	The approach of assuming certain sources were reflected in background concentrations is also not consistent with current practice for analyzing emissions impacts. Background air monitoring data is generally added to the results of a cumulative source modeling analysis in determining compliance with the national ambient air quality standards (NAAQS). However, as discussed in EPA's Guideline on Air Quality Models, if the source being modeled is not isolated, as is the case in this modeling assessment, then modeling of existing sources is necessary to determine the potential contribution of background sources. See Section 9.2.1 of 40 C.F.R. Part 51, Appendix W.	This approach has been used in numerous previous BLM air quality analyses and was agreed upon by the stakeholders group during the protocol development process. See comment response AQ31 regarding the GAQM.	
Vicki Stamper	I-99	AQ35	The NAAQS were set to protect the public and the environment from the adverse effects from air pollution. Thus, in determining whether these air quality standards might be exceeded as a result of the BLM's proposed action, the DRMP/EIS must use, or develop via modeling, background concentrations that are truly representative of the maximum concentrations that are currently occurring. Only then will the public be provided with a decent understanding of whether public	See comment response AQ32.	

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			<p>health and welfare will be protected or whether it will be adversely affected as a result of the Vernal DRMP on top of all other air emissions sources in the region. Without such an analysis, the DRMP/EIS must make clear that there really is no "cumulative" analysis that was done for the DRMP. Instead, the "cumulative" analyses mainly represent impacts due to new growth in air emissions including the proposed RMP sources.</p>		
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 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.</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>	X
Vicki	I-99	AQ37;	The Emission Inventory Is Flawed Because the	BLM's modeling contractor (Trinity Consultants)	

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Stamper		AQ38; AQ39; AQ40; AQ41; AQ42; AQ43, AQ44	<p>Inventory Sources Were Modeled at Annual Average Emission Rates Regardless of the Averaging Time of the Air Standard in Question.</p> <p>According to the 2004 Air Report, annual average emission rates were modeled for inventory sources for compliance with both short term and annual air standards. (Page 17 of the 2004 Air Report). No justification or reason was provided for this deviation from EPA -required modeling standards.</p> <p>EPA's modeling guidelines make clear that determinations of compliance with short term ambient standards require that averaging times for emission rates modeled reflect the averaging time of the standard being protected. Specifically, Section 11.2.3.3 of 40 C.F.R. Part 51, Appendix W, provides as follows:</p> <p>[S]equential modeling must demonstrate that the allowable increments are not exceeded temporally and spatially, i.e., for all receptors for each time period throughout the year(s) (time period means the appropriate PSD averaging time, e.g., 3-hour, 24-hour, etc.)</p> <p>Use of annual average emission rates will, in most cases, ensure an underestimate of emissions that could be affecting compliance with short term standards, such as for SO₂ (for which there are 3-hour and 24-hour average standards and PSD increments) and PM-10 and PM-2.5 (for which there are 24-hour average standards), as well as the visibility</p>	<p>agreed, during a telephone conference call on 4/18/03 with the air quality stakeholders, to attempt to locate CEM data for the "large inventory sources" to derive short-term emission rates, while using annual rates for smaller sources. However, little of this data was available; therefore, annual rates were used for all inventory sources.</p> <p>See comment response AQ31 regarding the GAQM.</p>	

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			impairment/regional haze which is evaluated on a 24-hour average basis. Thus, this approach does not meet current standards for air quality analyses.		
Vicki Stamper	I-99	AQ38	According to the 2004 Air Report, only sources inside 50 km of the modeling domain were included in the modeling, and the modeling domain only extended 50 km from receptors including those in the Class I areas (page 17 of 2004 Air Report). However, the inventory should have also included major industrial sources located beyond 50 km from the Class I areas if they could have a significant impact the Class I area. At the minimum, a review of existing and proposed new sources should have been performed to determine if additional sources should have been included in the modeling. For example, coal-fired power plants can often have significant impacts on a Class I area even when located 200-300 km away from that area, and several existing coal-fired power plants are located outside the modeling domain in Wyoming, Utah and New Mexico that could have significant ambient impacts on the Class I areas modeled. These and other high emitting facilities should have been evaluated to determine if they should have been included in the inventory sources.	The extension of the modeling domain 50 km beyond the modeled sources was agreed to by the stakeholders as part of the modeling protocol. This "buffer" beyond the modeled sources is generally standard modeling practice. It is done to avoid puffs generated by the model for sources close to the boundary leaving the domain quickly and therefore not having any modeled impact. Also, this NEPA air quality analysis is focused on the proposed action and alternatives, and is not performed to determine potential impacts at a given Class I area from every source regardless of proximity to the project area.	
Vicki Stamper	I-99	AQ39	With respect to reasonably foreseeable sources, several new coal-fired power plants have been proposed in recent years that should have been included in the inventory sources even if farther than 50 km from a Class I area. For example, the state of Utah has recently issued air quality permits for two new coal-fired power plants, the Sevier Power Company plant to be located in Sigurd, Utah and new Unit 3 of the Intermountain Power Plant, located in Millard County, Utah, both of which have been projected to impact some of the Class I areas modeled in southeast	No comment can be made regarding the specific sources mentioned in this comment without more detail about the permits or projects. Some of the sources mentioned are well outside the modeling domain for this project. See comment response AQ38.	

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			<p>Utah. Air permit applications have also been submitted for several other coal-fired power plants including for a new Unit 2 at the Bonanza Power Plant which is located in the Verna1 Field Office Area and for a new Unit 4 at the Hunter Power Plant which is located near the Vernal Field Office area. Air permit applications have also been submitted for sources to be located in northwestern New Mexico and/or on Navajo Nation land (e.g., the proposed Mustang Generating Station, the proposed Desert Rock Energy Facility, and the proposed Cottonwood Energy Center), and these facilities will likely impact the southeast Utah Class I areas modeled as well as the southwest Colorado Class I areas.</p> <p>Further, significant gas development is planned for southwestern Wyoming, southwest Colorado, and northwest New Mexico that will likely impact the nearby Class I areas modeled. Draft or final Resource Management Plans and/or Environmental Impact Statements are available for these planned developments (e.g., the Northern San Juan Basis Coalbed Methane Project, Farmington, NM RMP, Rawlins DRMP, and several other gas development projects in southwest Wyoming), and thus the BLM could and should have included these projected emissions in its reasonably foreseeable development inventory of sources modeled for the cumulative analysis.</p>		
Vicki Stamper	I-99	AQ40	In addition, it is also not clear whether any analyses were done to project the impacts of the Roan Plateau DRMP and other BLM source development along with the Vernal DRMP sources. Although the inventories and modeling report were developed for both the Roan	Roan Plateau RMP sources were included in the analysis of impacts in the Vernal RMPA.	

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			<p>Plateau and Vernal RMPs, it is difficult to determine from the 2004 Air Report whether Roan sources were included in the Vernal air analyses as reasonably foreseeable development. If not, that is another oversight that must be corrected. Clearly, the Roan sources could impact the same area that will be impacted by the Vernal sources and thus, should have been included in the cumulative analysis for the Vernal DRMP.</p>		
Vicki Stamper	I-99	AQ41	<p>No Inventory Was Compiled for Sources Permitted by EPA on the Uintah and Ouray Indian Reservation (Within the Vernal Field Office Area).</p> <p>Although the Uintah and Ouray Indian Reservation comprises much of the land in the Vernal Field Office, there is no indication that any review or determination of permitted sources within the reservation was obtained from the Environmental Protection Agency, Region VIII (i.e., the current permitting authority for such Indian lands). The Utah Division of Air Quality (UDAQ) has no permitting authority for sources considered to be located in "Indian Country" and thus a review of only UDAQ permitted sources very likely resulted in an incomplete emissions inventory that underestimated existing and reasonably foreseeable emission increases in the Vernal Field Office. This is a major oversight.</p>	<p>It is the understanding of BLM NSTC-AQ staff that at the time of modeling analysis, no sources on Uintah/Ouray Indian land qualified to be explicitly included in the modeling. The existing sources would be represented by the background air quality data.</p>	
Vicki Stamper	I-99	AQ42	<p>No Sources From Wyoming Were Included in the Modeling.</p> <p>Although, according to Figure A-I of the 2004 Air Report, the modeling domain reached into Wyoming, no Wyoming sources were inventoried or included in the modeling analyses. Yet, sources in Wyoming are</p>	<p>See comment response AQ38.</p>	

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			likely impacting (or will be impacting) some of the areas included in the modeling analyses, including the Vernal Field Office area and some of the Class I areas in northern Colorado. Thus, it was a major oversight to not include any sources from Wyoming in the source inventory.		
Vicki Stamper	I-99	AQ43	<p>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 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</p>	<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>	X

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			<p>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 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.</p>		
Vicki Stamper	I-99	AQ44	<p>It was also inappropriate to assume, for those sources whose exact location was not known, that no source would locate within 10 km of a Class I area. (Discussed on page 18 of the 2004 Air Report). It appears that such sources would likely be smaller sources that would not be subject to PSD permitting</p>	<p>BLM believes that this assumption is indeed appropriate. Because of various limitations, the exact location for every source could not be determined. Therefore, these sources had to be placed randomly with the appropriate portion of the modeling domain. BLM believes that it is unlikely</p>	

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			<p>requirements, as any source subject to PSD permitting requirements would have to do air quality modeling and thus the precise location of the source would be known. Smaller air pollution sources that are not subject to PSD permitting would not be subject to any requirement under Utah or Federal regulation to evaluate impacts on a Class I area and would not have been restricted from locating within 10 km of a Class I area. Thus, no additional more stringent air permitting requirements would apply to such non-PSD sources. Consequently, the locations of all sources should have been determined, rather than try to assume a location for a particular source or to create a 10 km buffer around each Class I area that would prohibit any source development. The approach used in the CALPUFF analysis could have resulted in an underestimate of ambient air impacts at Class I areas.</p>	<p>that few, if any of these sources will actually be located within 10 km of a Federal Class I area or that new sources would be located within that buffer.</p>	
Vicki Stamper	I-99	AQ45	<p>No Particulate Emissions From Increased Traffic on Existing Roads Were Quantified or Modeled.</p> <p>According to the 2004 Air Report, PM-10 and PM-2.5 emissions were quantified and modeled for only new roads. (See, e.g., page 26 of 2004 Air Report). However, there will also be increased vehicular traffic due to oil and gas development on existing roads in the Vernal Field Office area. This increased traffic and resulting increase in particulate emissions should have been quantified and modeled. In addition, the BLM should have also projected and modeled the increase in general traffic (i.e., not just related to oil and gas development) likely to occur as a result of the expanded road network. These issues are especially important for documenting the potential impacts to the PM-10 and PM-2.5 NAAQS and PM-10 Class II increments within the Vernal Field Office region.</p>	<p>The fugitive dust calculations included both resource and access roads.</p> <p>Inclusion of secondary non-project sources of fugitive dust was discussed during the stakeholder/protocol development meetings. It was the general opinion of the group that, due to the uncertainty and difficulty in quantifying these emissions, that they would not be included in the modeling.</p>	

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Vicki Stamper	I-99	AQ46	<p>The Placement of Air Pollution Sources for the CALPUFF Modeling Assessment Did Not Reflect All Areas Where Gas Development Would Be Allowed Under the Vernal DRMP.</p> <p>Figure A3 of Appendix A of the 2004 Air Report indicates the locations of modeled compressor engines and area sources of emissions. There were no emissions sources located north of Dinosaur National Monument (except for one source located in the extreme northwestern corner of the Vernal Field Office area) yet, for all of the alternatives, gas development in the northeast part of the Vernal Field Office area will be allowed (see Figures 11-14 of the Vernal DRMP/EIS).</p> <p>Further, the placement of the Vernal sources for the modeling analyses appears to have assumed that, for those areas identified in Figures 11-14 of the Vernal DRMP/EIS as being subject to "Timing and Controlled Surface Use," there would be restrictions on well spacing imposed by the BLM to ensure less dense development. However, it is not clear in the Vernal DRMP/EIS that there will be any restrictions limiting the density of well development in these regions (or in any part of the Vernal Field Office area).</p> <p>As a result, the modeling analyses may have under predicted maximum impacts from Vernal sources in some areas, including in the Vernal Field Office area or in nearby Dinosaur National Monument. The location of sources modeled should have more accurately reflected the locations of such sources as will be allowed under the Vernal DRMP.</p>	<p>The portions of the VMA nearest the Dinosaur National Monument are the Manila-Clay Basin and the Tabiona-Ashley Valley. These areas are projected to have very little development (see the Vernal RFD), and this is reflected in the number of modeled sources placed in these areas. The placement of sources in the model does in fact reflect the projected development patterns for the Vernal RMA.</p>	

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Vicki Stamper	I-99	AQ47	<p>The CALPUFF Modeling Did Not Evaluate Impacts at All Class I Areas that Could Be Affected by the Vernal DRMP.</p> <p>The CALPUFF modeling left out some key Class I areas that could be impacted by the Vernal DRMP and other reasonably foreseeable sources. Specifically, the Vernal modeling left out an analysis of impacts to all Colorado Class I areas, the Bridger Wilderness Area (WY), Fitzpatrick Wilderness Area (WY), and Grand Teton National Park (WY). Not only should these Class I areas been included in the analysis, but the modeling domain should have been enlarged to capture other sources of air pollution that are impacting these parks. Rocky Mountain and Mesa Verde National Parks and the Bridger and Fitzpatrick Wilderness areas are already greatly impacted by NOx and VOC emissions. Thus these nearby Class I areas should not have been left out of the air quality analysis for the Vernal DRMP/EIS. Interestingly, the modeling domain appears to extend out enough such that the Colorado Class I areas mentioned above should have been evaluated, but the CALPUFF modeling analyses failed to examine impacts at these Class I areas. Further, although the CALPUFF modeling domain appears to extend approximately 250 km to the south of the Vernal Field Office area, it only extends approximately 100 km to the north of the Vernal Field Office area. No reasons for these discrepancies are provided in the DRMP/EIS or the 2004 Air Report.</p>	<p>The modeling domain and the Class I areas included in the analysis were considered and approved by the stakeholders group, which included the FLMs (USFS, NPS) that have management responsibility for the Class I areas under consideration.</p> <p>See comment response AQ38.</p>	
Vicki Stamper	I-99	AQ48	<p>The DRMP/EIS Did Not Provide a Cumulative Assessment of Impacts to Visibility or Other Air Quality Related Values in Affected Class I Areas.</p>	<p>The BLM believes that the cumulative analysis presented in Draft RMP/EIS is adequate to meet NEPA requirements. The Air Quality Related Values (AQRV) (visibility, acid deposition, ANC) does use appropriate background values for each of</p>	

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			<p>Although the 2004 Air Report and the DRMP/EIS present results of "cumulative" visibility and other air quality related values (AQRV) impacts in affected Class I areas, the analysis does not truly represent a cumulative analysis of impacts. The AQRV analysis differs from the NAAQS analysis, in which the BLM assumed (improperly, as discussed in detail above) that a background concentration reflected the impacts of all sources in existence prior to the "monitoring baseline date." However, the AQRV analyses for the Vernal RMP do not use a similar approach, and no information was provided on the existing visibility impairment or the existing levels of nitrogen and sulfur deposition for any of the Class I areas modeled. The DRMP/EIS should have included a comprehensive cumulative assessment of impacts to AQRVs at affected Class I areas so it can be determined whether the Vernal DRMP sources will cause or contribute to significant adverse impacts on any AQRVs at affected Class I areas. At the minimum, the DRMP/EIS must make clear that no cumulative assessment of impacts to AQRVs was conducted for the Vernal DRMP</p>	<p>the analyses. See the details of each analysis in the TSD.</p>	
Vicki Stamper	I-99	AQ49	<p>The Visibility Analysis Relied on an Incorrect Standard for Defining Significant Visibility Degradation.</p> <p>In the visibility analysis for Class I areas (also performed for some Class II areas), the BLM relied on a 1.0 deciview (dv) change as defining whether the Vernal DRMP would result in significant visibility impacts in mandatory Class I areas. However, all of the Federal Land Managers (i.e., those agencies with an affirmative responsibility under the Clean Air Act for protecting the air quality related values of mandatory Class I areas) consider a 0.5 dv change to be a Limit of Acceptable Change threshold. (The DRMP/EIS</p>	<p>BLM, as one of the FLMs, uses the number of days in excess of a 1.0 deciview "Just Noticeable Change" potential visibility change as a significance threshold for its NEPA analyses.</p> <p>This is based on the following statement by Pitchford and Malm in their 1994 Atmospheric Environment article titled "Development and Application of a Standard Visual Index" (Vol. 28, No. 5, pp 1049-1054): "Ideally, a JNC [Just Noticeable Change] change in a scene resulting from a change in the extinction coefficient should be about a 1 or 2</p>	

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			<p>misstates the Federal Land Manager's Air Quality Related Values Workgroup Phase I Report, December 2000 {FLAG guidance) as applying a 0.5 dv change as a limit of acceptable change only for single sources, and a 1.0 dv change to cumulative impact analyses.)</p>	<p>dv [deciview] change in the deciview scale (i.e. a 0.1 - 0.2 fractional change in extinction coefficient) regardless of the baseline visibility level." By using the 1.0 dv threshold, BLM has chosen to report potential significance based on the lowest value of Pitchford and Malm's range of "Just Noticeable Change."</p> <p>Although it is possible that certain specific views (with certain specific air pollutants, meteorological conditions and sun angles) could present a "Just Noticeable Change" at levels below 1.0 dv, The BLM is not aware of any scientific publications or regulatory requirements which indicate 0.5 dv is a "Just Noticeable Change." EPA's Final Regional Haze Regulations (64 FR 126, July 1, 1999) support the use of 1.0 dv as the significance level when conducting periodic 5 and 10 year reasonable progress reports towards meeting the national visibility goal of no man-made impairment within mandatory federal PSD Class I areas by 2064.</p> <p>The only place that BLM is aware of the 0.5 dv being used as a threshold is in the December 2000 FLAG Phase I Report (Figure V-1) which describes for a single source permit review, if the single source contribution to change in extinction is not => 5.0 per cent [equivalent to 0.5 dv], then the FLM [USDA-FS, USDI-NPS, or USDI-F&WS] is not likely to object to the permit.</p> <p>The December 2000 FLAG Phase I Report (Figure V-1) also states that for a cumulative visibility impact</p>	

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				<p>analysis of PSD increment consuming sources, if no single source contributes => 0.4 per cent change in extinction [equivalent to 0.04 dv] nor the cumulative sources contribute => 10 per cent change in extinction [equivalent to 1.0 dv], then the FLM [USDA-FS, USDI-NPS, or USDI-F&WS] is not likely to object to the permit.</p> <p>There is simply no basis for interpreting 0.5 dv as a "Just Noticeable Change" for cumulative NEPA potential visibility impact assessments.</p>	
Vicki Stamper	I-99	AQ50	<p>The Class I Visibility Analysis for the DEIS Does Not Comport with Federal Land Managers' Guidance for Such Analyses.</p> <p>The Class I area visibility analysis conducted for the DRMP/EIS deviates from the commonly followed FLAG guidance of the Federal Land Managers (FLMs). Specifically, the visibility modeling did not consider any hours with relative humidity greater than 90%. Although the reasons for this are not stated in the 2004 Air Report, this approach has been proposed in some recent air quality permit applications based on the claim that the IMPROVE visibility monitoring data Standard Operating Procedures ignore those data. However, the IMPROVE Standard Operating Procedures do not indicate that any hours over 90% relative humidity are "invalid." Instead, when the relative humidity measured at the transmissometer receiver is greater than 90%, the transmissometer data is flagged as having a "possible interference" due to meteorological interferences. (See page 23 of "Transmissometer Data Reduction and Validation (IMPROVE Protocol), Number 4400-5000, Revision</p>	<p>The National Park Service, U.S. Fish & Wildlife Service, and USDA-Forest Service formed their "Federal Land Managers' AQRV Work Group" (FLAG) "to achieve greater consistency in the procedures Federal Land Managers use in identifying and evaluating AQRVs (air quality related values)." Although BLM also administers mandatory federal PSD Class I areas, BLM were not invited to be one of the FLAG agencies. FLAG's fundamental principle is that new air pollutant emission sources "(PSD and those subject to new source review) should not, by themselves, significantly impede progress toward the national visibility goal."</p> <p>In their December 2000 final FLAG Phase I report, FLAG identified a process to analyze potential AQRV (including visibility) impacts when conducting New Source Review. Their referenced legal basis for the visibility impact analysis process was stated as: "The FLMs have visibility protection responsibility under 40 CFR §51.307 (New source review), which spells out the requirements for State Implementation Plan (SIP) visibility protection</p>	

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			<p>1.0, Mar 1995, available at http://vista.cira.colostate.edu/improve/Publications/SOPs/arssop.asp.</p> <p>It is important to note that, in high humidity conditions, nitrate and sulfate particles attract water molecules, making the particles very efficient in scattering light and causing decreased visibility conditions. If precipitation were occurring, then of course many of those particles would be "scrubbed" from the air, but under the FLAG guidance humidity is capped at 98% to represent such conditions. Thus, the result of the BLM's approach of not using relative humidity data over 90% means that visibility impacts were underestimated not using relative humidity data over 90% means that visibility impacts were underestimated. Not using relative humidity data over 90% means that visibility impacts were underestimated.</p> <p>As discussed above, based on the FLMs' 0.5 dv Limit of Acceptable Change threshold, the BLM sources alone would have a significant impact on visibility in two Class I areas. With the necessary adjustments to the emissions inventory and the modeling of two additional years of mesoscale meteorology data, in addition to properly considering the relative humidity data, the visibility modeling results would likely show even greater visibility impacts as a result of BLM sources alone. As discussed above, based on the FLMs' 0.5 dv Limit of Acceptable Change threshold, the BLM sources alone would have a significant impact on visibility in two Class I areas. With the necessary adjustments to the emissions inventory and the modeling of two additional years of mesoscale</p>	<p>programs, as well as 40 CFR §52.27 (Protection of visibility from sources in attainment areas) and 40 CFR §52.28 (Protection of visibility from sources in non-attainment areas). These three provisions, taken together along with the SIP-approved rules, establish the visibility protection program for new and modified sources throughout the country."</p> <p>Appendix 2.A (Visibility Parameters) states:</p> <p>"FLAG proposes that the relative humidity adjustment to the "dry" scattering efficiencies (unadjusted for relative humidity) for hygroscopic particles are made as follow: ...The preferred alternative is to apply day-by-day f(RH) adjustment factors to the analysis. For this alternative hourly relative humidity data are needed. Hourly f (RH) values should be averaged to generate a 24-hour relevant f (RH) factor. FLAG recommends, however, that if the hourly relative humidity exceeds 98%, that it be rolled back to 98%, so that there will be no f (RH) factors applied that are greater than f (98)."</p> <p>Furthermore, Table 2.A-1 states:</p> <p>"f(RH) values for various values of relative humidity" (un-referenced) assumes dry ammonium nitrate and ammonium sulfate light scattering efficiencies are to be multiplied by the following factors at the specified relative humidity's:</p> <p>1x (no multiplier) up to 36 percent RH; 2x (doubled)</p>	

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			<p>meteorology data, in addition to properly considering the relative humidity data, the visibility modeling results would likely show even greater visibility impacts as a result of BLM sources alone.</p> <p>As discussed above, based on the FLMs' 0.5 dv Limit of Acceptable Change threshold, the BLM sources alone would have a significant impact on visibility in two Class I areas. With the necessary adjustments to the emissions inventory and the modeling of two additional years of mesoscale meteorology data, in addition to properly considering the relative humidity data, the visibility modeling results would likely show even greater visibility impacts as a result of BLM sources alone.</p>	<p>at 71 percent RH; 3x (trebled) at 82 percent RH; 4x (quadrupled) at 88 percent RH; factor of 4.3x at 90 percent RH; factor of 5.3x at 91 percent RH; factor of 5.9x at 92 percent RH; factor of 7.0x at 93 percent RH; factor of 8.4x at 94 percent RH; factor of 9.8x at 95 percent RH; factor of 12.4x at 96 percent RH; factor of 15.1x at 97 percent RH; and a factor of 18.1x at 98 percent RH. FLAG "clamps" the light scattering growth factor at 18.1x for relative humidity values of 99 and 100 percent without any explanation.</p> <p>The growth factors were derived by Tang's ammonium sulfate growth curves smoothed between the crystallization and deliquescence points [Tang I.N., Wong W. T. and Munkelwitz H. R. (1981). The relative importance of atmospheric sulfates and nitrates in visibility reduction. Atmospheric Environment 15, 2463] which clearly show a dramatic exponential assumed light scattering efficiencies above 90 percent RH. In fact, a 99 percent RH corresponds to a growth factor of nearly 50x, and 100 percent RH would be over 4,000,000x</p> <p>When BLM models potential visibility impacts from a proposed action (and alternatives) under NEPA using daily optically measured extinction, we will not use data observed at ambient conditions above 90 percent RH because the IMPROVE Standard Operating Procedures indicate those data are not valid (The conclusion of invalidity is easily drawn from their discussion and selection of data). We will assume either modeled or observed aerosols can</p>	

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				<p>increase their "dry" light scattering efficiencies by 4.3x at ambient conditions at or above 90 percent RH as a reasonable assumption.</p> <p>However, it is unreasonable to assume (throughout the semi-arid continental climate regimes of the West) that the visibility impact analysis procedures described by FLAG, and the just noticeable change parameter of 1.0 deciview developed by Pitchford and Malm (1993), are valid under ambient conditions at or above 90 percent RH for an entire 24-hour day. Aerosol data collected under ambient conditions at or above 90 percent RH for 24-hours are likely to be minimized due to precipitation "scrubbing," and the potential impact of modeled aerosols would be overestimated using light scattering efficiencies greater than 4.3x.</p> <p>Although BLM accepts these compounding biases as "reasonable" up to 90 percent RH, we will not further exaggerate these biases by using light scattering efficiencies up to 18.1x, as suggested by the commenter.</p>	
Vicki Stamper	I-99	AQ51	The cumulative visibility analysis, considering BLM sources and the inventory sources (which began operating or increased emissions since the "monitoring baseline date"), indicated that the BLM sources would contribute to adverse visibility impacts at Arches National Park. However, in the 2004 Air Report, a method was used to "refine" the analysis that is inconsistent with current policy and not scientifically credible. However, the DRMP/EIS does not provide any information on the refinements. The cumulative visibility modeling analyses results are provided on	Refined visibility analyses, using results from the same CALPUFF modeling used in the screening analysis, were performed. More details of the refined visibility are discussed in comment response AQ52.	

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			page 4-27 of the DRMP/EIS, and the discussion on page 4-28 of the DRMP/EIS indicates that no refined modeling analysis was done. This conflicts with the information in the 2004 Air Report.		
Vicki Stamper	I-99	AQ52	<p>Specifically, the daily "refined" analysis of the 2004 Air Report considered hourly IMPROVE optical monitoring data measured at Canyonlands National Park from 1987- 2001. Neither the DRMP/EIS nor the 2004 Air Report provide further details on how the Canyonlands National Park data were used to refine the visibility analysis. My guess is that the Canyonlands data may have been used to alter what was considered as natural background conditions in the CALPUFF modeling. Changes in visibility are to be determined based on natural visibility conditions. Visibility conditions that existed during 1987-2001 in Canyonlands National Park were clearly being impacted by manmade sources and did not reflect natural conditions. As defined in federal regulations, visibility impairment means "any humanly perceptible change in visibility ...from that which would have existed under natural conditions." [Emphasis added.] (40 C.F.R. §51.301).</p> <p>While there has been some use of on the ground transmissometer data in a few recent air permit applications for new coal-fired power plants, its use was to attempt to indicate if weather could be shown as the cause of modeled adverse visibility impacts (by comparing the modeled days of high impact to those same days of on the ground transmissometer data). To my knowledge, the Federal Land Manager air quality experts have not accepted this approach to discounting visibility impacts. In large part, this is</p>	<p>The refined visibility calculations were done :</p> <ol style="list-style-type: none"> 1. The concentrations of coarse PM, soil PM, sulfate ion, and nitrate ion, are calculated from the CALPUFF modeled daily f (RH) and extinctions for PM coarse, PM fine, sulfate and nitrate. 2. The concentrations are then used to calculate delta dv using the standard equation, using an average daily background extinction and average daily f (RH). The values for extinction) are taken from the Canyonlands IMPROVE site. F (RH) values were taken from CALPUFF model output. <p>As stated above in response to previous comments, FLAG Guidance is just that, guidance, not regulation. BLM uses FLAG methodology when we believe it is appropriate and scientifically defensible. However, BLM NSTC staff use other methods when we believe other methods will yield a more defensible result.</p>	

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			<p>because the transmissometer data is flagged conservatively, and the flags are not accurate indications of weather interference. It does not appear that the BLM used this approach, since the BLM evaluated many other years of transmissometer data than just the modeled 1996 meteorological data year. However, as stated above, it is not clear exactly how the transmissometer data was used to refine the cumulative visibility analysis for the Vernal DRMP because it is not specifically discussed in the Air Report or in the DRMP/EIS. In any case, the Federal Land Managers' modeling guidance does not provide for refinement of modeled visibility impacts based on transmissometer data. Thus, the BLM's "refined" visibility assessment approach does not comport with currently accepted practices for such analyses.</p> <p>In summary, the BLM should not have used its "refined" visibility analysis to discount its initial modeling assessment. Instead, the Vernal DRMP/EIS should have clearly indicated that the BLM sources under the Vernal DRMP could contribute to significant impacts on visibility in Arches National Park. Further, as discussed above, the visibility modeling analysis should be redone to include a proper and complete emissions inventory (for sources expected in the Vernal Field Office area, inventory sources, and other reasonably foreseeable development in the region), use 3 years of mesoscale meteorological data, properly consider the relative humidity data, and assess impacts at other Class I areas besides just those in southern Utah that could be impacted by the Vernal Field Office sources. Only after such a complete and thorough visibility modeling analysis will it be known if the Vernal DRMP sources could cause or contribute to significant</p>		

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			adverse impacts on visibility in nearby Class I areas.		
Vicki Stamper	I-99	AQ53	<p>The DRMP/EIS Relied on Incorrect Sulfur and Nitrogen Deposition Thresholds for National Park Service Class I Areas.</p> <p>The 2004 Air Report relied on USDA-Forest Service sulfur and nitrogen deposition threshold values from 1989 of 3 kilograms per hectare per year (kg/ha/yr) for sulfur and 5 kg/ha/yr for nitrogen when evaluating whether the sulfur and nitrogen deposition were significant. However, the National Park Service and the Fish and Wildlife Service use an entirely different and more stringent set of thresholds of concern for sulfur and nitrogen deposition. Specifically, in 2001 and 2003, these two agencies developed deposition analysis thresholds for nitrogen and sulfur deposition in NPS and FWS Class I areas (available at http://www2.nature.nps.gov/air/Permits/flag/FlagInfo/N%20&%20S%20DAT%20Guidance.doc). The deposition analysis thresholds or "DATs" represent the level at which the deposition impacts are considered to be significant. In the West, the DATs are 0.005 kg/ha/yr for both sulfur and nitrogen deposition.</p> <p>With the revisions necessary to the emissions inventory and the modeling of additional years of meteorological data and at additional nearby Class I areas as discussed above, the sulfur and nitrogen deposition predicted for Verna1 Field Office sources may cause or contribute to exceedances of these thresholds. Until a proper analysis is completed, it is not clear whether the Verna1 Field Office sources in conjunction with other reasonably foreseeable development will have</p>	<p>The USDA-Forest Service (Fox, et al 1989) has identified the following total deposition (wet plus dry) thresholds below which no adverse impacts are likely: five kg/ha-yr for sulfur, and three kg/ha-yr for nitrogen." (See Fox et al, 1989) - these values actually vary by region of the US).</p> <p>The FLAG "Deposition Analysis Thresholds" (used as guidance when reviewing PSD Permit Applications) are based on a "natural background deposition value" (0.50 kg/ha-yr N or S "East" and 0.25 kg/ha-yr N or S "West"), adjusted by a "Variability Factor" (0.50, or cutting natural background in half) and a "Cumulative Factor" (0.04, assuming the cumulative source impact would be 25 times greater than the modeled deposition impacts).</p> <p>Whereas Fox identifies potential adverse impacts, FLAG is simply a screening process to eliminate those sources that are certain not to have a significant impact, so that no further analysis is required by the FS, FWS or NPS. Therefore, BLM did not use the FS DATs in this analysis.</p>	

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			significant impacts on sulfur or nitrogen deposition at nearby Class I areas.		
Vicki Stamper	I-99	AQ54	<p>The DRMP/EIS Failed to Include an Analysis of VOC Emissions or its Impacts on Ozone Concentrations.</p> <p>The DRMP/EIS did not provide any assessment of volatile organic compound (VOC) emissions from the planned and reasonably foreseeable oil and gas development, or from flaring operations. Further, the DRMP/EIS did not include any analysis of impacts from air emissions sources of VOCs and NOx on ground level ozone concentrations. According to the 2004 Air Report, no ozone analysis was done because of the "relatively insignificant" levels of VOC emissions.</p> <p>Recent studies have indicated that the amount of light alkane hydrocarbons and methane from oil and gas development can be quite significant (and are often underestimated), which can create optimal conditions for ozone formation. In fact, air monitoring performed across Texas, Oklahoma, New Mexico, Missouri, Arkansas and Kansas in 2001 and 2002 found high levels of hydrocarbons including methane, ethane, propane, and butane, as well as alkyl nitrates which are a byproduct of the reactions that form ozone. See Smog Underestimated in Southwestern US. at http://www.pnas.org/misc/archive100603.html#HL1. See also "Extensive regional atmospheric hydrocarbon pollution in the southwestern United States" by Aaron S. Katzenstein, Lambert A. Doezema, Isobel J. Simpson, Donald R. Blake, and F. Sherwood Rowland, available at the URL listed above.</p>	<p>VOC (HAPs) emissions from compressors and dehydrators were included in the modeling.</p> <p>The CALPUFF model, approved by the stakeholder group, cannot be used to predict potential future ozone concentrations.</p> <p>BLM is cooperating with IPAMS on the Uinta Basin Air Quality, which will model potential ozone impacts from oil and gas development in the basin as well as surrounding BLM Field Offices. Also, the air quality analysis for the White River RMP Amendment & Oil and Gas EIS will model ozone impacts in the region.</p> <p>BLM would welcome a cooperative, multi-agency ozone modeling exercise focused on oil and gas development in the Western U.S.</p> <p>EPA Region VIII, in their comments on the Roan Plateau RMP DEIS, said "Running a regulatory ozone model such as RPM-IV for purposes of the DEIS is impractical, and we understand that BLM's National Science & Technology Center (now National Operations Center) may be reluctant to estimate potential ozone impacts with a conservative method such as VOC/NOx point source screening tables."</p> <p>This topic will be discussed further in a future meeting with the State of Utah and the Utah DEQ.</p>	

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			<p>Although elevated ozone levels are often thought of as associated only with major metropolitan areas, recent monitoring data shows that rural areas to the north, east, and south of the Vernal Field Office area are experiencing elevated concentrations of ozone. For example, Rocky Mountain National Park in Colorado is experiencing ozone concentrations in excess of the ozone NAAQS. Southwest Colorado/northwestern New Mexico has also been experiencing elevated levels of ozone concentrations very close to the level of the NAAQS. The Green River Basin in southwestern Wyoming monitored concentrations that were 94% of the ozone NAAQS in 2001 (the monitor is no longer operating). Further, information provided by the state of Utah shows that the 8-hour average ozone concentration in nearby Canyonlands National Park for 2001-2003 was 0.074 ppm- almost 93% of the ozone NAAQS. Thus, ozone concentrations should be a concern for the Vernal DRMP, and yet estimates of increases in ozone precursor emissions (VOCs and NOx) and potential impacts on ozone concentrations were ignored in the Vernal DRMP/EIS and the 2004 Air Report.</p> <p>Considering the recent studies on the ozone potential of oil and gas development emissions, the elevated ozone concentrations in areas that could be affected by the Vernal DRMP ,as well as the health and environmental impacts that can occur due to elevated ozone concentrations, the DRMP/EIS should have evaluated the environmental impacts that could occur due to ozone formation from the DRMP sources and all existing and reasonably foreseeable growth in contributing VOC and NOx emissions to the region. At the very minimum, the DRMP/EIS should have</p>		

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			included an estimate of potential VOC emissions that could occur as a result of the Vernal DRMP and other reasonably foreseeable sources based on the latest studies of the amount of VOCs that can be emitted from oil and gas development.		
Vicki Stamper	I-99	AQ55	Because of the flaws in the near-field analysis with respect to the number of wells and other associated air pollution sources modeled and no consideration of local topography, the estimated concentrations of hazardous air pollutants were likely underestimated in the BLM's analysis. Further, there was no evaluation of the potential hazardous air pollutant emissions that could be emitted from flaring operations. With the recommended changes to the near-field analysis, the hazardous air pollutant concentrations would likely be greater.	See comment responses AQ8, AQ9 and AQ12) on the near-field modeling analysis.	
Vicki Stamper	I-99	AQ56	Even with the BLM's analysis, the results showed that the benzene, formaldehyde, and xylene concentrations exceeded the range of acceptable air concentration limits (AACLs).	While this is true, it should be noted that the incremental risk associated with these potential modeled concentrations (benzene, formaldehyde; xylenes are not considered carcinogenic) are well with the EPA generally acceptable risk range of 1×10^{-4} to 1×10^{-6} (EPA, 2003)	
Vicki Stamper	I-99	AQ57	Similarly, due to the flaws in the inventory for the CALPUFF analysis (including insufficient number of compressor engines and failure to space wells more in line with where the BLM has projected the development to occur), the hazardous air pollutant analysis in the CALPUFF assessment also likely underestimated overall ambient impacts.	See comment responses AQ28, AQ29, AQ34, and AQ37-44 on the far-field (CALPUFF) modeling analysis.	
Vicki Stamper	I-99	AQ58	The DRMP/EIS Failed to Analyze Mitigation Measures for the Predicted Air Impacts. Although the BLM's air quality analyses predicted significant air quality impacts to visibility in Arches	The "predicted significant air quality impacts to visibility in Arches National Park" is one day with visibility impacts greater than 1.0 deciview in the screening analysis. The refined analysis showed no such impacts.	

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			<p>National Park as well as for concentrations of benzene, formaldehyde, and xylene, the DRMP/EIS did not include evaluate potential mitigation measures. Pages 4-25 to 4-26 of the DRMP/EIS discuss potential mitigation measures for prescribed burning and for fugitive dust from mineral extraction. However, no mitigations for air emissions sources due to gas development (e.g., compressor stations) were discussed. Instead, the BLM indicated that other agencies' air permitting regulations would require cumulative analyses and would ensure no adverse impacts. However, as discussed above, many of these air pollution sources would be under EP A's jurisdiction if located in "Indian Country." Most of these sources will be considered minor sources and won't be subject to any permitting requirements if located in Indian Country .If such sources located on lands under the jurisdiction of UDAQ, then an air quality permit will likely be required, but it is not clear under Utah air quality regulations that a cumulative air quality analysis would be conducted (or that UDAQ would have any authority to deny a permit if a new minor source would contribute, but not cause, an adverse impact on air quality). Further, UDAQ's permitting regulations would not require an evaluation of impacts on visibility or other air quality related values or a cumulative PSD increment analysis for a minor source.</p> <p>If the flaws in the BLM analyses that are discussed above were addressed, the air quality impacts as a result of the Vernal DRMP and other reasonably foreseeable development would likely be worse and potentially more extensive. Thus, subsequent to a complete and proper air analysis, the DRMP must include a discussion and evaluation of mitigation</p>	<p>See comment response AQ56 regarding air toxics.</p> <p>Based on the above, namely that no significant air quality impacts were modeled, there is no need to discuss mitigation.</p> <p>A cumulative analysis was conducted as part of larger air quality study.</p> <p>Conjecture regarding what the results of a significantly changed (which BLM believes unnecessary) air quality analysis are improper and irrelevant, as would acting on such conjecture.</p>	

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			<p>measures to avoid or minimize these impacts. As stated in 40 C.F.R. § 1508.20, mitigation includes, among other things, avoiding the impact altogether by not taking a certain action or parts of an action, minimizing impacts by limiting the magnitude of an action, and reducing or eliminating the impact over the life of the action. The DEIS must include a discussion of all mitigation options. Such a discussion is necessary to ensure that public officials have all of the information necessary to ensure that air quality is protected to the greatest extent possible.</p>		
Vicki Stamper	I-99	AQ59	<p>Based solely on the EPA standards and models for human health and visibility, The Air Quality analysis does not consider potential impacts to fish and wildlife resources, nor does it present data in a format meaningful to natural resources. In, general, the standards for deposition (particulates, SO₂, and NO₂) are based on annual averages, not on actual total deposition, which is more important to plant and aquatic communities.</p>	<p>The dispersion models used in the air quality analyses are the generally accepted methods available to predict potential air quality impacts for a NEPA-related analysis. Air Quality standards for criteria pollutants are set by the EPA and must be used to judge potential impacts.</p> <p>There are no standards for deposition provided by EPA, so the BLM uses the USDA-Forest Service (Fox, et al 1989) total deposition (wet plus dry) thresholds below which no adverse impacts are likely: five kg/ha-yr for sulfur, and three kg/ha-yr for nitrogen. See comment response AQ53 for more information.</p>	
Vicki Stamper	I-99	AQ60	<p>Of special interest in the naturally nitrogen-limited environment in the Western United States are deposition totals for nitrogen (N). In a recent Bioscience article (2003), Fenn, et. al. noted several ecological effects from N deposition in the West. Some of the documented effects at various sites include: N enrichment and shifts in diatom communities in alpine lakes; increased NO₃- concentrations high-elevation lakes; N enrichment of soil and plants; decreased</p>	<p>The workgroup report appears to be a worthwhile effort, but until air managers have “interpreted data, published data, and standardized thresholds or limits of acceptable change,” little can be done in applying these to on-going NEPA analyses.</p>	

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			<p>diversity of mycorrhizal communities; alpine plant community changes; enhanced growth of invasive species; lichen community changes; and an altered fire cycle. Other studies have noted that chronic nitrogen enrichment can alter the diversity and mutualistic function of mycorrhizal fungal communities, which may influence plant communities (Egerton-Warbuton, et. al., 2001), and that N deposition can suppress plant diversity, forb production, and forb abundance (Zavaleta, et. al., 2003). As response to concerns, researchers from the BLM, Forest Service, National Park Service, and various institutions of higher education produced a report with methods for monitoring lichens for air quality indicators (USDA Report, 2002)</p>		
Vicki Stamper	I-99	AQ61	<p>In general ecological terms, you should provide information about deposition to the VPA from BLM-permitted activities, particularly resources.</p>	<p>This information was provided for nitrate and sulfate deposition.</p>	
Vicki Stamper	I-99	AQ62	<p>Also, since the VPA contains several listed and candidate species, it is important to acquire knowledge about the potential impacts of, at a minimum, N deposition, and it is important to minimize deposition. We recognize that the modeling for this RMP was both inexact and expensive, and do not recommend repeating it. We also recognize that the time frame for ecological change can be long. However we do recommend the following:</p> <p>Partner with the Ashley National Forest to continue and expand lichen/air quality research conducted by Professor Larry St. Clair of BYU on FS sites and add to it BLM-managed lands. The partnership should include the Dinosaur National Monument (Monument). This will allow you to use existing baseline data gathered at the Monument by Prof. St. Clair and will more</p>	<p>The BLM thanks the USFWS for the recommendations.</p> <p>BLM would welcome the USFWS to set up meetings with BLM State, Field Office, or NSTC personnel to discuss this issue further.</p> <p>The BLM does not believe it would be appropriate to require operators to join a voluntary program. Several operators within the area administered by the Vernal FO are already enrolled in the program.</p> <p>So called "green completions" (flareless) are becoming common practice in many areas.</p>	

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			<p>accurately quantify air quality impacts to the Monument's natural resources.</p> <p>Require, as a condition of approval, oil and gas operators to partner with the EPA Gas STAR program to minimize emissions from natural gas production, transmission, and distribution.</p> <p>Develop and implement alternatives to natural gas flaring</p>		
Vicki Stamper	I-99	AQ8	<p>The BLM performed the near-field modeling in flat terrain (Page 4-12 of DRMP/EIS). Yet, the BLM admits that complex terrain "exists over much of the project area." (Page 4-17 of the DRMP/EIS). The modeling analysis would likely show higher ambient concentrations if the terrain of the area was taken into account, for example due to emission plumes impacting elevated terrain above a source or due to trapping of air pollutants. Thus the BLM should have attempted to estimate the locations of air pollutant sources using the topography of the Vernal Field Office area and the expected areas of gas development.</p>	<p>Flat terrain was chosen because the level of information available for the location of sources was insufficient to do otherwise. Further, modeled results in complex terrain would not necessarily result in higher concentrations. This would depend on several factors including: location of sources relative to the terrain; shape, height, and location of terrain; meteorology, source characteristics, etc.</p>	
Vicki Stamper	I-99	AQ9	<p>The BLM could have considered the complex terrain of the area by evaluating areas where high gas development is likely to occur and by making an educated guess, based on local meteorology and topography, as to the location that might show worst case (or close to worst case) ambient impacts.</p>	<p>NEPA no longer requires a "worst-case" analysis. Thus, this type of analysis was not done. (See Federal Register: April 25, 1986 (Volume 50, Number 80), Rules and Regulations, Pages 15618-15626)</p>	
Vermillion Ranch Limited Partnership	O-33	AQ143	<p>RMP & DEIS Text with Changes</p> <p>The air quality modeling performed as part of this analysis considered the air quality impacts of both proposed (near-field and far-field) and existing emission sources within the project area. As discussed in the specific air quality modeling section and the TSD</p>	<p>See comment response AQ89.</p> <p>An EIS was prepared nationally to address wind energy potential on BLM managed lands. As a part of the EIS process, it addressed potential for each State. For the Vernal Field Office area, the potential was low.</p>	

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			<p>(Trinity, 2003), background data in most cases represented an overestimation of existing concentrations, which adds an additional margin of safety to the other conservative assumptions discussed previously. It is possible, however, that the development proposed by Alternative A, combined with increased population growth and usage of the project area, could result in increased pollutant levels above those projected by the model.</p> <p>Discussion / Explanation</p> <p>The RMP omits any discussion of wind energy, even though nationally DOI encourages development of wind energy on public lands.</p>	<p>See comment responses ME 240 and ME 241.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>AQ144</p>	<p>The air quality modeling projected an increase in PM10 concentrations within the VPA and specific PSD Class II sensitive areas related to management decisions specific to mineral extraction. Future, non-project sources of airborne particulate and NOx emissions associated with increased traffic in the area could produce potentially substantial cumulative impacts to these areas.</p> <p>The adjacent national forests report pine beetle infestation and fuel loading that could lead to wildfires. The fires will increase particulate and carbon emissions temporarily.</p>	<p>It was decided during the modeling protocol development meetings that projected future emissions from non-project secondary mobile sources would not be included in the modeling because the uncertainty in projecting population growth and then translating that growth to vehicle and fugitive dust emissions was too high.</p> <p>The existing statements regarding wildfire emissions are adequate given the large year-to-year variability in conditions. It should be noted that the background concentration comes from an urban area (Grand Junction, CO) and may overestimate rural background concentrations.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>AQ145</p>	<p>Air quality modeling also projected an increase in ambient 24-hour xylene concentrations associated with management decisions specific to mineral extraction. As the existing background concentrations exceeded</p>	<p>It should be noted that the background concentration comes from an urban area (Grand Junction, Colorado) and may overestimate rural background concentrations.</p>	

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			the ambient air quality threshold of 100 µg/m ³ , the potential exists that future; non-project sources of xylene (such as compressors or glycol dehydrators associated with non-BLM gas extraction activities) could result in cumulative impacts to air quality in the VPA.		

Alternative Development					
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Duchesne County	G-9	AT43 (AT-JJ)	Last 2 sentences: are these comparisons really between alternatives B and D or are they between alternatives B and A as stated?	The comparisons are between Alternatives B and A as stated. Alternative B was compared to Alternative D elsewhere in the paragraph.	
Carbon County	G-11	AT9 (AT-A)	Carbon County supports and recommends that the alternatives chosen for any decisions through the EIS be consistent with County and Tribal plans to the maximum extent possible, not in derogation of federal law.	Comment noted.	
U.S. Fish and Wildlife Service	G-12	AT64 (JAT-15)	The document states as an assumption: "BLM would have the funding and work force to implement the selected alternative." To this should be added: "... and all associated restoration, mitigation, and monitoring." We believe this assumption without the addendum could have significant consequences. For example, if the BLM lacks funding and adequate work force to ensure compliance with stipulations and mitigation measures, that shortfall may lead to unmitigated impacts to fish and wildlife resources and degraded habitats. We recommend you provide a separate analysis based on the current level of compliance monitoring as supported by existing funding, and develop thresholds for permitting based on the amount of compliance monitoring you are able to conduct.	The funding and work force levels for the Vernal Field Office are administrative in nature and thus not subject to analysis within the RMP. The RMP provides the framework for how work will be accomplished subject to public demands, resource objectives, and available funding.	
Wyoming Natural Gas Pipeline Authority	G-14	AT10 (AT-B)	Would like to recommend that the BLM adopt Alternative B as the next management plan.	Comment noted.	
Wyoming Natural Gas Pipeline Authority	G-14	AT11 (AT-C)	The WPA encourages adopting Alternative B to reduce the timing/seasonal lease restrictions and stipulations for oil and gas leases.	Comment noted.	

Alternative Development					
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Daggett County	G-17	AT49 (AAT-6)	The entire document seems to have a restrictive nature to it, so we urge you to consider changing the VRMs to III and limiting the sizes of ACEC's and SRMA, while closely examining how to positively and actively manage the BLM controlled areas in Daggett County to improve these areas for livestock, wildlife, recreation and other uses.	Comment noted.	
Bureau of Reclamation	G-18	AT44 (AAT-1)	We suggest that you reference the Operation of Flaming Gorge Dam EIS (for which the BLM is a cooperating agency) in this section of the EIS (pg 1-13, 1.5).	It is not necessary to reference the Flaming Gorge Dam EIS in the RMP.	
USFS— Ashley National Forest	G-19	AT75 (LAT-11)	How does Alternative A provide for Goals and Objectives identified in Section 2.4 in regards to riparian, livestock, and soils?	Alternative A combines with the Management Common to All actions outlined in Tables 2.1.16 (Riparian Resources), Table 2.1.8 (Livestock and Grazing Management), and 2.1.17 (Soil and Water Resources) for each of the resources in question for an overall approach that achieves the identified goals and objectives. Specific management actions would be implemented under Alternative A that control grazing through timing restrictions and other prudent and feasible controls within the BLM's authority to restore proper functioning condition in riparian areas that have been compromised. Alternative A would implement Surface Operating Standards for Oil and Gas Exploration and Development, require development plans for slopes between 21-40%, and have no surface occupancy on slopes greater than 40% in order to reduce soil degradation, sedimentation, and disruption of stream soils and waters. Alternative A would combine livestock management actions, such as timing/season of use controls, with forage, wildlife, and vegetation management actions to achieve proper utilization of rangelands.	

Alternative Development					
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UBAOG	G-22	AT6	<p>Strike:</p> <p>"employs timing and sequencing of events" Replace with "would identify land objectives and would authorize actions to achieve those objectives".</p> <p>The RMP should identify the desired outcome or land objective and manage to achieve the objective. As written, the RMP imposes numerous prescriptions that prohibit otherwise lawful uses without any assurance that the restrictions will achieve any identified land resource objective.</p>	<p>The RMP identifies goals and objectives for the entire planning area in addition to individual resource programs. See Table 2.1.1 in the PRMP/FEIS under Management Common to All Alternatives.</p> <p>Management prescriptions can be tied to the goals and objectives. For example in Table 2.1.16 (Riparian Resources) in the PRMP/FEIS under Goals and Objectives:</p> <p>"Maintain, restore, improve, protect, and expand riparian-wetland areas so they are in proper functioning condition and meet Utah Rangeland Health Standards for their productivity, biological diversity, and sustainability, and achieve an advanced (late-climax seral stage) ecological status, except where resource management would require an earlier ecological status for such purposes as vegetation diversity."</p> <p>One of the prescriptions put forward to achieve this goal is in Table 2.1.16 in the PRMP/FEIS under Management Common to All Alternatives:</p> <p>"Allow no new surface-disturbing activities within active flood plains, public water reserves, or 100 meters of riparian areas unless:</p> <p>There are no practical alternatives. Impacts would be fully mitigated.</p> <p>The action was designed to enhance the riparian</p>	

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				resources.”	
Uintah, Daggett, and Duchesne Counties	G-25	AT7	The 2002 RFD was completed along with the mineral potential report in 2002. Since then BLM has provided additional direction on resource planning and incorporation of EPCA into planning. The draft should be reviewed to insure compliance with these directives. Based on this review alternatives should be created or selected that fully embraces the direction including the selection of alternatives that are performance based or outcome based.	The BLM incorporated EPCA into planning. In the PRMP/FEIS see: Section 1.13 (Relationship to the President’s National Energy Policy and The Scientific Inventory of Onshore Federal Lands’ Oil and Gas Resources and Reserves, and The Extent and Nature of Restrictions or Impediments to their Development) Section 1.7 (How Vernal Field Office RMP Considered EPCA Inventory Information and Concerns).	
Joan & Mark Strobel	I-2	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses. Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat. See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.	
Joan & Mark Strobel	I-2	AT4	The preferred alternative should not designate off-road vehicle routes in areas that could be protected and enjoyed as wilderness, including Upper Desolation Canyon, White River, Wolf Point and the lands surrounding Dinosaur National Monument.	Comment noted.	

Alternative Development					
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Barbara Backman	I-8	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29</p>	
Jane Broadwell	I-10	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Mr. & Mrs. James L. Denison	I-12	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Blair McLaughlin	I-14	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Abe Levy	I-15	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Tim Maret	I-16	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.	

Alternative Development					
Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				See comment responses GC68, TR13, TR22, and TR29.	
Bran Potter	I-17	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
John Wise	I-20	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
John Spezia	I-23	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and</p>	

Alternative Development					
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				<p>Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Bill Walsh & Shirley Weathers	I-24	AT17 (AT-I)	I ask you to consider a balanced alternative for recreation/travel and mineral leases.	Comment noted.	
Bill Walsh & Shirley Weathers	I-24	AT33 (AT-Z)	Adopt alternative C Areas of Critical Environmental Concern (ACEC's) so that sensitive habitat is protected against new development and unnecessary travel.	Comment noted.	
George & Frances Alderson	I-28	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
George & Frances Alderson	I-28	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
George & Frances Alderson	I-28	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be</p>	

Alternative Development					
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				<p>analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Cindi K. Timmermann	I-29	AT17 (AT-I)	I ask you to consider a balanced alternative for recreation/travel and mineral leases.	Comment noted.	
Joel G	I-30	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like	

Alternative Development					
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				<p>timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Joel G	I-30	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
Krista Batterson	I-31	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the	

Alternative Development					
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				<p>non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Krista Batterson	I-31	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Dan Bellis	I-32	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow or oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions	

Alternative Development					
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				<p>for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Dan Bellis	I-32	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Joanna Bettmann	I-34	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Mary Ann Lewis	I-35	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Joanna	I-36	AT16	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as	Comment noted.	

Alternative Development					
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Bettmann		(AT-H)	wilderness.		
Kath M. Anderson	I-37	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
John Gray	I-38	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Steve Bremner	I-39	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Ravi Grover	I-40	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Dustin Perry	I-43	AT18 (AT-J)	Energy production can be done in an environmentally sensitive are with good results. Please approve the alternative that maximizes oil and gas development potential of our area.	Comment noted.	
Bill Batty	I-45	AT19 (AT-K)	I strongly favor the alternatives that give industry the ability to harvest natural gas on the West Tavaputs Plateau, as addressed in the draft resource management plan.	Comment noted.	
Amber Briem	I-48	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
William	I-49	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was	

Alternative Development					
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Huggins				considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Steven C. Hansen	I-52	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Steven C. Hansen	I-52	AT20 (AT-L)	The draft RMPs Preferred Alternative A leaves out vast archaeologically rich areas that deserve a special management status. A district nomination of Nine Mile Canyon to the National Register of Historic Places is currently in the works and endorsed by the State BLM office. Only SRMA Alternative C would provide a boundary that would adequately protect these extremely sensitive resources that makes this national treasure worthy of such recognition.	The BLM recognizes the important and unique nature of the archaeological record within the Vernal Planning Area. Under current law and policy, the BLM can only assign special designations, and therefore special management, to geographic areas where specific resource values are present, where imminent threats of irreparable harm to those values exist, and where management actions above those of standard BLM practice are necessary to reduce or eliminate those threats. Special designations such as ACECs or SRMAs are not necessary to provide for consideration of cultural resources in land management. Section 110 of the National Historic Preservation Act requires that the BLM proactively manage cultural resources under its jurisdiction that are either listed on or have been determined eligible for listing on the National Register of Historic Places.	
Wayne B. Peters	I-53	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Wayne B.	I-53	AT8	There is only one alternative that comes close and that is Alternative C. Even this alternative needs changes.	Comment noted.	

Alternative Development					
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Peters			I'll start with Figure 13, Oil and Gas Leases. Way, way too many leases. Take all the areas in Figures 20, 21, and 24, proposed and current, and allow NO oil, gas, CBM, and mineral development. Make all of the above VRM 1, too.		
Paul Watts	I-54	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
William Sovehmah	I-55	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Jean Bennett	I-56	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Matthew Jenkins	I-59	AT21 (AT-M)	I vote for Alternative D.	Comment noted.	
Dale Jenkins	I-60	AT22 (AT-N)	The best alternative for long term interests of the local communities, their economies, the other various interests and the overall ecological health of the lands and waters at issue is Alt C. Alt C also gives the most protection and access to the area's rich archaeological history.	Comment noted.	
John MacDonald	I-62	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	

Alternative Development					
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Name Withheld at commentor's request	I-71	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	FLPMA directs the BLM to manage public lands on the basis of 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. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources. See comment response AT58.	
Name Withheld at commentor's request	I-71	AT4	The preferred alternative should not designate off-road vehicle routes in areas that could be protected and enjoyed as wilderness, including Upper Desolation Canyon, White River, Wolf Point and the lands surrounding Dinosaur National Monument.	Comment noted.	
Crista Worthy	I-72	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Dave Allin	I-74	AT23 (AT-O)	I am very encouraged that the full development of the Flat Rock Field natural gas resources would be enabled under Alternatives A, B, and C that would allow oil and gas leasing of the split estate land. The "no action" Alternative D would continue the status quo that has left Federal Minerals T1-15S, R17-20E with known productive potential to remain undrilled and unproductive.	Comment noted.	
Dave Allin	I-74	AT24 (AT-P)	The US needs a reliable long-term supply of natural gas, and to that end, Alternatives A and B would be the most accommodating.	Comment noted.	
Jack A. Smith	I-78	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been	

Alternative Development					
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				<p>incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Jack A. Smith	I-78	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
R. L. Laffoon	I-79	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
R. L. Laffoon	I-79	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p>	

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				BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.	
Sara L. Bein	I-81	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
Sara L. Bein	I-81	AT25 (AT-Q)	The BLM's preferred alternative should not designate routes or allow for oil and gas leasing in areas with wilderness characteristics.	<p>As outlined in BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review, cross country OHV travel is not allowed. OHV travel in areas with wilderness characteristics would be restricted to designated routes.</p> <p>BLM is not required to protect all lands with wilderness characteristics. The Federal Land Policy and Management Act (FLPMA) and BLM policy require that FLPMA Section 603 wilderness study areas (WSAs) be managed to preserve their wilderness characteristics until Congress either designates them wilderness or releases them for other uses. WSAs will be managed under BLM's "non-impairment" standard (the Interim Management Policy for Lands Under Wilderness Review (IMP) until Congress acts.</p>	

Alternative Development					
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				<p>Other "non-WSA lands with or likely to have wilderness characteristics" are found in the Vernal Field Office. These non-WSA lands include those lands found to have wilderness characteristics in the 1999 Utah wilderness inventory, and those lands the field office preliminarily determined were likely to have wilderness characteristics through an interdisciplinary review of new information that was submitted by the public.</p> <p>Though BLM is precluded from managing non-WSA lands under the IMP and the Section 603 non-impairment standard, both FLPMA Sections 201, 202, and 302 and IM Nos. 2003-274 and 2003-275 Change 1 provide that BLM may elect to manage non-WSA lands with or likely to have wilderness characteristics using other prescriptions to protect those characteristics. This is accomplished through land use planning. For instance, the Affected Environment (Chapter 3) section of the RMP/EIS identifies the non-WSA lands with or likely to have wilderness characteristics. The various resource program sections of the Alternatives (Chapter 2) portion of the RMP/EIS describe how the lands are proposed to be managed. The Environmental Consequences (Chapter 4) section of the RMP/EIS discloses the effects the actions of each alternative would have on the wilderness characteristics of these lands.</p> <p>In sum, through land use planning, BLM will decide which lands will be managed to protect the values associated with wilderness characteristics and which lands will be managed for other resources</p>	

Alternative Development					
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				values and uses.	
Sara L. Bein	I-81	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	<p>Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses.</p> <p>Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.</p> <p>See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.</p>	
Lo I and Won Yin	I-84	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Lo I and Won Yin	I-84	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
Lo I and Won Yin	I-84	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:	

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				<p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Lo I and Won Yin	I-84	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p>	

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				BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.	
James and Elizabeth Robinson	I-85	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
James and Elizabeth Robinson	I-85	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
James and Elizabeth Robinson	I-85	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives: “...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.” For purposes of analysis, county travel plan maps	

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				<p>were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
James and Elizabeth Robinson	I-85	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Claire Martineau	I-86	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal	FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many	

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			<p>opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.</p>	<p>different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources.</p> <p>See comment response AT58.</p>	
<p>Claire Martineau</p>	<p>I-86</p>	<p>AT13 (AT-E)</p>	<p>In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource</p>	

Alternative Development					
Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Claire Martineau	I-86	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
Merrill Bitter	I-89	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Merrill Bitter	I-89	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	FLPMA directs the BLM to manage public lands on the basis of 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. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources.	

Alternative Development					
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				See comment response AT58.	
Curt A. Livingston, Sr.	I-90	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	FLPMA directs the BLM to manage public lands on the basis of 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. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources. See comment response AT58.	
Curt A. Livingston, Sr.	I-90	AT4	The preferred alternative should not designate off-road vehicle routes in areas that could be protected and enjoyed as wilderness, including Upper Desolation Canyon, White River, Wolf Point and the lands surrounding Dinosaur National Monument.	Comment noted.	
Eric Rechel	I-91	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural	

Alternative Development

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Beverly Greenhow	I-92	AT12 (AT-D)	<p>The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.</p>	<p>FLPMA directs the BLM to manage public lands on the basis of 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. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources.</p> <p>See comment response AT58.</p>	
Beverly Greenhow	I-92	AT14 (AT-F)	<p>The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the</p>	<p>See comment response AT1.</p>	

Alternative Development					
Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.		
Bill Ingalls	I-93	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	FLPMA directs the BLM to manage public lands on the basis of 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. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources. See comment response AT58.	
Tom Groene	I-97	AT26 (AT-R)	Close Utah Wilderness Coalition proposal to leasing and ORV's	Comment noted.	
Bryon Brown	I-98	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Robert Kessler	I-102	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Bertha Ward	I-103	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow or oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions	

Alternative Development					
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				<p>for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Bertha Ward	I-103	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
Bertha Ward	I-103	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to	Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe	

Alternative Development					
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			the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	<p>management goals and prescriptions for recreational uses.</p> <p>Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.</p> <p>See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.</p>	
Richard Wilson	I-104	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	<p>FLPMA directs the BLM to manage public lands on the basis of 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. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources.</p> <p>See comment response AT58.</p>	
Richard Wilson	I-104	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow or oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions</p>	

Alternative Development					
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				<p>for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Richard Wilson	I-104	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
John Scott	I-105	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness	

Alternative Development

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			<p>or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Lydia Garvey	I-106	AT12 (AT-D)	<p>The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands.</p>	<p>FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to</p>	

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			Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	implement laws, regulations and policies for many different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources. See comment response AT58.	
Lydia Garvey	I-106	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of	

Alternative Development					
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				<p>resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Betsy Shade	I-107	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
George Huntzinger	I-109	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Morris Jenkins	I-110	AT21 (AT-M)	I vote for Alternative D.	Comment noted.	
Mark W. Belles	I-112	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Richard Lance Christie	I-114	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow or oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands	

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				<p>would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Gary C. Nichols	I-115	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Dee Tvedt	I-116	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p>	

Alternative Development					
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				See comment responses GC68, TR13, TR22, and TR29.	
Brian Gingras	I-117	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29	
Suzanne Valencia	I-118	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
James E. Kowalsky	I-120	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
James E. Kowalsky	I-120	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
James E. Kowalsky	I-120	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives: “...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open	

Alternative Development					
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				<p>and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Lynn Hague	I-121	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Lynn Hague	I-121	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Lynn Hague	I-121	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p>	

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				<p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Lynn Hague	I-121	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Michael	I-122	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was	

Alternative Development					
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Cochran				<p>considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Michael Cochran	I-122	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Michael Cochran	I-122	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D</p>	

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				<p>reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Michael Cochran	I-122	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Edward and Sally Kosnik	I-123	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Edward and Sally Kosnik	I-123	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Edward and Sally Kosnik	I-123	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open</p>	

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				<p>and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Brenda Durant	I-127	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Brenda Durant	I-127	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide</p>	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Brenda Durant	I-127	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	<p>Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses.</p> <p>Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.</p> <p>See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.</p>	
Tom and Ann	I-128	AT25	The BLM's preferred alternative should not designate	As outlined in BLM Handbook H-8550-1, Interim	

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Yuill		(AT-Q)	routes or allow for oil and gas leasing in areas with wilderness characteristics.	<p>Management Policy for Lands Under Wilderness Review, cross country OHV travel is not allowed. OHV travel in areas with wilderness characteristics would be restricted to designated routes.</p> <p>BLM is not required to protect all lands with wilderness characteristics. The Federal Land Policy and Management Act (FLPMA) and BLM policy require that FLPMA Section 603 wilderness study areas (WSAs) be managed to preserve their wilderness characteristics until Congress either designates them wilderness or releases them for other uses. WSAs will be managed under BLM's "non-impairment" standard (the Interim Management Policy for Lands Under Wilderness Review (IMP) until Congress acts.</p> <p>Other "non-WSA lands with or likely to have wilderness characteristics" are found in the Vernal Field Office. These non-WSA lands include those lands found to have wilderness characteristics in the 1999 Utah wilderness inventory, and those lands the field office preliminarily determined were likely to have wilderness characteristics through an interdisciplinary review of new information that was submitted by the public.</p> <p>Though BLM is precluded from managing non-WSA lands under the IMP and the Section 603 non-impairment standard, both FLPMA Sections 201, 202, and 302 and IM Nos. 2003-274 and 2003-275 Change 1 provide that BLM may elect to manage non-WSA lands with or likely to have wilderness</p>	

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				<p>characteristics using other prescriptions to protect those characteristics. This is accomplished through land use planning. For instance, the Affected Environment (Chapter 3) section of the RMP/EIS identifies the non-WSA lands with or likely to have wilderness characteristics. The various resource program sections of the Alternatives (Chapter 2) portion of the RMP/EIS describe how the lands are proposed to be managed. The Environmental Consequences (Chapter 4) section of the RMP/EIS discloses the effects the actions of each alternative would have on the wilderness characteristics of these lands.</p> <p>In sum, through land use planning, BLM will decide which lands will be managed to protect the values associated with wilderness characteristics and which lands will be managed for other resources values and uses.</p>	
Eric Adman	I-129	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Ronald J. Parry	I-130	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Ted W.	I-131	AT16	We urge BLM to give complete protection to wilderness	Comment noted.	

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Yellman		(AT-H)	values in all the areas proposed for designation as wilderness.		
Loretta Dunne	I-132	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Joan and Clyde McClelland	I-134	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Joan and Clyde McClelland	I-134	AT25 (AT-Q)	The BLM's preferred alternative should not designate routes or allow for oil and gas leasing in areas with wilderness characteristics.	<p>As outlined in BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review, cross country OHV travel is not allowed. OHV travel in areas with wilderness characteristics would be restricted to designated routes.</p> <p>BLM is not required to protect all lands with wilderness characteristics. The Federal Land Policy and Management Act (FLPMA) and BLM policy require that FLPMA Section 603 wilderness study areas (WSAs) be managed to preserve their wilderness characteristics until Congress either designates them wilderness or releases them for other uses. WSAs will be managed under BLM's "non-impairment" standard (the Interim Management Policy for Lands Under Wilderness Review (IMP) until Congress acts.</p> <p>Other "non-WSA lands with or likely to have wilderness characteristics" are found in the Vernal Field Office. These non-WSA lands include those</p>	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>lands found to have wilderness characteristics in the 1999 Utah wilderness inventory, and those lands the field office preliminarily determined were likely to have wilderness characteristics through an interdisciplinary review of new information that was submitted by the public.</p> <p>Though BLM is precluded from managing non-WSA lands under the IMP and the Section 603 non-impairment standard, both FLPMA Sections 201, 202, and 302 and IM Nos. 2003-274 and 2003-275 Change 1 provide that BLM may elect to manage non-WSA lands with or likely to have wilderness characteristics using other prescriptions to protect those characteristics. This is accomplished through land use planning. For instance, the Affected Environment (Chapter 3) section of the RMP/EIS identifies the non-WSA lands with or likely to have wilderness characteristics. The various resource program sections of the Alternatives (Chapter 2) portion of the RMP/EIS describe how the lands are proposed to be managed. The Environmental Consequences (Chapter 4) section of the RMP/EIS discloses the effects the actions of each alternative would have on the wilderness characteristics of these lands.</p> <p>In sum, through land use planning, BLM will decide which lands will be managed to protect the values associated with wilderness characteristics and which lands will be managed for other resources values and uses.</p>	
Debby Walter	I-135	AT16	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as	Comment noted.	

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		(AT-H)	wilderness.		
Brit Harvey	I-137	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	<p>Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses.</p> <p>Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources) in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.</p> <p>See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.</p>	
Rich Moser	I-138	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
William Simpson	I-140	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Alison Kennedy	I-141	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Mary Moran	I-142	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been	

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				incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Mary Moran	I-142	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Charles F. Belmont	I-143	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Ronald G. Harris	I-144	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Patricia H. Miller	I-145	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Ezra Thomas Jones	I-147	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Mark Schoen	I-148	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	

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Charles W. Phy and Susan A. Phy	I-149	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Mary Stults	I-150	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Richard McCracken	I-151	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Penny Schiller	I-152	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Jeff Crider	I-153	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Stephen Borton	I-154	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for	Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for	

Alternative Development					
Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			other recreational activities and the protection of wildlife habitat.	<p>recreational uses.</p> <p>Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.</p> <p>See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.</p>	
Kenneth C. Parsons	I-155	AT47 (AT-T)	I support Alternative A. It seems to strike the best balance of use and access versus protection and sequestering.	Comment noted.	
Susan Lefler	I-156	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Violet Schwartz Corkle and William I. Corkle	I-157	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Jan and Gayla Kobialka	I-158	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and</p>	

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				TR29.	
Jan and Gayla Kobialka	I-158	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
C. Loran Hills	I-159	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Doris and Joel Arshalomov	I-160	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be</p>	

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				<p>analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Paul J. Ebbert	I-161	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	

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Nancy Bostick	I-162	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	

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Nancy Bostick	I-162	AT33 (AT-Z)	Adopt alternative C Areas of Critical Environmental Concern (ACEC's) so that sensitive habitat is protected against new development and unnecessary travel.	Comment noted.	
Nancy Bostick	I-162	AT34 (AT-AA)	Alternative A does not provide the appropriate protection for the wilderness values that the agency itself identified in those areas.	Alternative A includes land use provisions such as no surface occupancy, controlled surface use, and timing restrictions in non-WSA lands identified as having wilderness characteristics, to the extent these lands are located within and/or contribute to the designation of the area in which they are located as ACEC's or other special management areas. Additionally, OHV travel would be restricted to designated routes only throughout the planning area, including lands with wilderness characteristics. Table 2.1.10 (Non-WSA Lands with Wilderness Characteristics) in the PRMP/FEIS provides information on management provisions in areas with wilderness characteristics. These management provisions are further describes in Section 4.24 in the PRMP/FEIS.	
Garry Mott	I-164	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Graham Stafford	I-165	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Laird Fetzer Hamblin	I-169	AT60 (JAT-11)	Alternative C should protect all areas in the VPA determined to be of wilderness character with Wilderness designation. And this should be the chosen alternative. Of the 1,725,512 ac in the VPA,	Comment noted.	

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			very little remains relatively pristine. Only 328, 374 ac are identified by the LM to be or likely to be pristine enough for wilderness designation. These tracts of unfragmented, undisturbed lands are important refuges for wildlife and reserves for native plants. They are also important as undisturbed watersheds. It is critical that these lands not be further fragmented and that current fragmentation be reduced by the reclamation of unnecessary roads.		
Laird Fetzer Hamblin	I-169	AT61 (JAT-12)	Alternative C should not allow any mineral extraction of any kind on portions of the VPA currently undisturbed by these activities, and this should be the chosen alternative. Alternative C is currently not significantly different from any of the other alternatives. Undisturbed portions of the Tavaputs plateau and other undisturbed areas of the VPA are valuable to our nation and the local community as wild reserves for native plants and animals and as uncontaminated watersheds. This value is far greater than any temporary gain for the nation or local community in extraction of oil gas or minerals. Often the effects on wildlife from exploration and extraction have not been fully accounted for.	The Draft EIS evaluated a range of alternatives in detail to assure a balanced approach was recommended that allows opportunities for mineral exploration and production and for the BLM to protect the resources and resource uses. A supplement to the Draft RMP was later issued to consider Non WSA lands with wilderness characteristics. The management actions proposed under the Alternatives offer management flexibility to ensure resources are protected while allowing for acceptable levels of mineral development. Additionally, as exploration and production activities proceed, impacts (short and long term) will be evaluated in subsequent NEPA documents.	
Laird Fetzer Hamblin	I-169	AT62 (JAT-13)	Alternative C should allow for no grazing of livestock or feral animals (horses or other). This should be the chosen alternative. Desert lands such as these are incapable of withstanding grazing and trampling by livestock. It is critical that livestock not be grazed on these lands, and that feral horses be removed.	The BLM is required to evaluate a range of alternatives in detail to assure a balanced approach was recommended that allows opportunities for legitimate land uses, including livestock and wild horse grazing, and for the BLM to protect the resources and resource uses. The management actions proposed under the Alternatives offer management flexibility to ensure resources are protected while allowing for acceptable levels of land and resource uses. The RMP addresses the permitted use on those allotments that are available for livestock grazing per BLM handbook 1601,	

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				Appendix C page 14. In compliance with laws, regulation and policy, grazing permits are subject to review and evaluation before the permits are renewed. If necessary to maintain rangeland health, adjustments are made to the level of grazing use based on monitoring data and sound best science methods. Additionally, annual adjustments are made to the grazing use based on current range conditions and forage production amounts, including adjustments during periods of range depletion due to "severe drought or other natural causes" (43 USC 315b). Monitoring data is systematically collected to determine if a statistically significant change of the resources has occurred. The data is collected and evaluated using best science methods to make any necessary changes in management practices or authorized livestock forage level. Regular monitoring and adjustments, as necessary, ensure healthy sustainable rangeland ecosystems are maintained.	
Laird Fetzer Hamblin	I-169	AT63 (JAT-14)	Riparian areas are particularly vulnerable to disturbance and contamination. 89 rivers were identified as potentially eligible for Wild and Scenic River designation, but only 6 of these rivers have been proposed. Only Alternative C includes all 11 of the river segments proposed as Wild and Scenic River designation. Even this designation will only protect 216 miles of river. It is therefore critical that this Alternative is chosen.	Comment noted.	
Susan Potts	I-170	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and	

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				TR29.	
Bill Robinson	I-173	AT40 (AT-GG)	The DRMP/DEIS fails to do a proper alternatives analysis under NEPA. It fails to comply with NEPA because it failed to explore and objectively evaluate all reasonable alternatives. The range of alternatives discussed only differed on minor matters and provided no real alternatives other than the relatively minute differences between A, B and C. It fails to include an alternative that would preclude ORV use in WSAs, proposed and other areas the VFO has found to have wilderness qualities.	<p>ORV use is precluded within WSAs in all alternatives.</p> <p>The RMP presents four alternative proposals for managing public lands in the VPA. The alternatives were developed in response to the issues identified in the public scoping process and the planning criteria. The BLM recognizes that social, economic, and environmental issues cross land ownership lines and that extensive cooperation is needed to actively address issues of mutual concern. To the extent possible, these alternatives were crafted utilizing input from public scoping comments, Duchesne, Daggett, and Uintah County representatives and other cooperating agencies.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Smokey Rasmussen	I-174	AT48 (AAT-5)	The requirements of NEPA that require the BLM to use the best available science and data indicate that the BLM should change the utilization dates on the McFarley Flat Allotment from the current dates of April 1-April 30 to the new dates April 21-May21. This change will be better for the resource because it will allow the grass to mature more prior to livestock grazing. This later date would also help alleviate the fire hazard because the livestock will graze some of the grass that dries up and becomes a fire hazard.	Comment noted.	

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Chad F. Hamblin	I-175	AT46 (AAT-3)	As the plan is now written, I like alternative C the best in all aspects of the plan, and I hope you will reconsider and choose it as the preferred alternative. In addition, I support the comments of the Uintah Mountain Club and urge you to implement them in the plan, and I also endorse the comments being submitted by my brother, Laird Fetzer Hamblin (Commenter I-169).	Comment noted.	
Form Letter 1	FL1	AT28 (AT-U)	The preferred alternative (as written) does not lay out a basic foundation for future land use decisions by broadly imposing restrictive measures to limit industry's ability to access lands for environmentally responsible oil and gas leasing, exploration and development.	Appendix K of the RMP outlines the stipulations (for all surface disturbing activities) that allow for development without undue, unmitigated, or irretrievable impacts to environmental resources. These stipulations allow for industry to conduct oil and gas exploration and development across the vast majority of lands within the Vernal Planning Area.	
Form Letter 1	FL1	AT29 (AT-V)	The preferred alternative needs to ensure the number of wells in the RFD document is not a cap on development for the planning area by including flexibility in the planning process to allow for increased activity due to price spikes or new discoveries without invalidating existing lease rights.	The RFD is not a planning criteria but rather a measure of surface disturbance based upon a best estimate at the time the RMP is prepared. The RFD presented in the EIS is not intended as a limit the number of individual wells within the planning area. It is used as a relative measure of development for the purpose of impacts analysis. The RFD allows for collocation and retirement and reclamation. As additional information is obtained over the life of the RMP, the RFD can be recalculated and amended as necessary.	
Form Letter 1	FL1	AT30 (AT-W)	The preferred alternative should fully analyze the socioeconomic impacts of the restrictions placed on oil and natural gas development. The analysis should reach further than the immediate planning area and include the impact on natural gas users nationwide.	Socioeconomic impacts from all resource decisions are discussed in Section 4.12 in the PRMP/FEIS. Section 4.12.3.4 discusses the impacts to minerals development from special designations. NEPA does not require that the analysis reach beyond the planning area. CEQ Regulations for implementing NEPA state that the environmental	

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				impact statement shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration.	
Form Letter 1	FL1	AT31 (AT-X)	The preferred alternative should reduce the cumulative and overlapping prescriptions that unduly restrict development, in some cases to narrow the window of time, including unnecessary special designations (ACEC, VRM, SRMA, etc...)	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 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. The RMP will include the decisions required for each program, and BLM will ensure that the allowable uses and allocations are compatible and meet the objectives of the selected plan.	
Form Letter 2	FL2	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Form Letter 2	FL2	AT45 (AAT-2)	While BLM does recognize 275,000 acres as having or likely to have wilderness characteristics, it offers no alternatives that manage these areas to protect and	See comment responses AT1 and AT3.	

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			<p>enhance their wilderness character.</p> <p>I urge you to develop a management plan that protects these 275,000 acres and those included in the citizens' proposal. Please prohibit all motorized travel off designated routes and all forms of mineral extraction or development in these areas.</p>		
Ecology Center of Southern California	O-2	AT12 (AT-D)	<p>The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.</p>	<p>FLPMA directs the BLM to manage public lands on the basis of 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. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources.</p> <p>See comment response AT58.</p>	
Ecology Center of Southern California	O-2	AT13 (AT-E)	<p>In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the</p>	

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				<p>other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Ecology Center of Southern California	O-2	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
The Nature Conservancy Moab Project Office	O-6	AT73 (LAT-9)	We support the continuing designation of the current ACECs and the newly-nominated ones under these alternatives: A- Bitter Creek and Lower Green River; Alternative C-Coyote Basin, 4 Mile Wash, 9 Mile Canyon, Middle Green River, Lower Green River, and White River.	Comment noted.	

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The Nature Conservancy Moab Project Office	O-6	AT74 (LAT-10)	The application of Utah BLM Rangeland Health Standards to all resource programs and authorized activities is good. Because these are Standards and not merely "Goals," we assume that by this statement the VFO is obligating itself to adopt a Final RMP that will be consistent with these "rules," and thereby achieve the conditions defined by the four Standards on BLM-administered public lands in the VPA. Proposed actions under some of the Alternatives clearly appear to violate these Standards (Appendix F) in the short and long term, and thus must be rejected for inclusion in the FRMP.	As the commenter did not identify specific actions under the alternatives that he/she believes violate the Standards. As such, this comment cannot be addressed. It is BLM's opinion that the various provisions of the alternatives meet the Standards.	
PacifiCorp	O-7	AT78 (NAT2)	As a general matter, PacifiCorp believes that the DRMP should better emphasize and promote issues related to electrical energy development, particularly given the importance of the VFO area in providing access for the continued supply of the electrical energy needs in Utah and throughout the West.	The BLM cannot promote specific land uses, but rather must serve as a neutral administrator when attempting to balance mandated multiple land uses while protecting against undue damage and degradation to the cultural and natural environment from those uses.	
PacifiCorp	O-7	AT82 (NAT6)	PacifiCorp suggests the Carbon-Ashley 138 kV line passes through the VRM class II, III and IV areas under each alternative shown in Attachment 4; or the Carbon-Ashley 138kV line passes through two proposed ACEC's (Red Mountain and Lears Canyon) under alternative C and the Red Mountain ACEC under all other alternatives as shown in PacifiCorp's Comment Letter Attachment 3; or the Carbon-Ashley 183 kV line appears to cross over the eastern part of the proposed Argyle Creek Wild and Scenic River area in Alternative C as shown generally in Attachment 3. The final RMP should contain a detailed discussion explaining that any such designation will not impair the existing lines or, if such impairment will result, a detailed explanation of how and the legal justification therefore.	The RMP already acknowledges in several places that valid existing rights are recognized by all management decisions that may be implemented in the Final RMP through the Record of Decision. These valid existing rights include utility easements. No additional discussion specific to utilities is necessary.	
PacifiCorp	O-7	AT83	Some of PacifiCorp's distribution lines cross the Coyote	See comment response AT82.	

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		(NAT7)	Basin-Myton Bench ACEC under Alternative C. In addition, the distribution lines north of Vernal are within the Red Mountain ACEC. Also, the distribution lines north of Vernal are located within Class II VRM under all alternatives.		
Duchesne County Water Conservancy District	O-10	AT35 (AT-BB)	DCWCD supports an alternative that provides the least restrictions on the use of natural resources in the planning area. This appears to be Alt B.	Comment noted.	
Questar	O-12	AT32 (AT-Y)	Areas of concern that are not adequately addressed in lease stipulations have and will continue to be addressed in site-specific COAs and/or project-specific EAs or EISs, the proposed additional restrictions and, in some cases, outright disregard for oil and gas industry's valid existing rights proposed in Alternative A and or C are unwarranted. Alt B is much more consistent federally mandated multiple use management of the public lands.	All management actions proposed under all alternatives recognize valid existing rights and do not apply newly developed management prescriptions that differ from prescriptions already ascribed to those rights.	
Questar	O-12	AT65 (LAT-1)	The DEIS provides no specific analysis to evaluate and justify the preferred actions as the least restrictive necessary and does not document the scientific basis for the proposed oil and gas restrictions. (As per IMs 2003-234 p.4 and 2003-233 p.2).	In the absence of specifics, we are unable to respond to your comment.	
Questar	O-12	AT66 (LAT-2)	The DEIS fails to address the rationale for not continuing many of the current management standards that have governed energy development in the planning area.	<p>The general purpose and need for the RMP and its provisions regarding the spectrum of land uses is presented in Section 1.2 of the PRMP/FEIS.</p> <p>Alternatives and management actions considered but not included or carried forward in the Draft RMP are discussed in Section 1.9 of the PRMP/FEIS.</p> <p>The Energy Policy and Conservation Act (EPCA) requires BLM to evaluate existing lease mitigation</p>	

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				requirements to determine if they are appropriate and effective. The alternatives reflect that evaluation (IM 2003-233).	
Newfield Exploration Co.	O-13	AT11 (AT-C)	The WPA encourages adopting Alternative B to reduce the timing/seasonal lease restrictions and stipulations for oil and gas leases.	Comment noted.	
IPAMS	O-14	AT29 (AT-V)	The preferred alternative needs to ensure the number of wells in the RFD document is not a cap on development for the planning area by including flexibility in the planning process to allow for increased activity due to price spikes or new discoveries without invalidating existing lease rights.	The RFD is not a planning criteria but rather a measure of surface disturbance based upon a best estimate at the time the RMP is prepared. The RFD presented in the EIS is not intended as a limit the number of individual wells within the planning area. It is used as a relative measure of development for the purpose of impacts analysis. The RFD allows for collocation and retirement and reclamation. As additional information is obtained over the life of the RMP, the RFD can be recalculated and amended as necessary.	
IPAMS	O-14	AT32 (AT-Y)	Areas of concern that are not adequately addressed in lease stipulations have and will continue to be addressed in site-specific COAs and/or project-specific EAs or EISs, the proposed additional restrictions and, in some cases, outright disregard for oil and gas industry's valid existing rights proposed in Alternative A and or C are unwarranted. Alt B is much more consistent federally mandated multiple use management of the public lands.	All management actions proposed under all alternatives recognize valid existing rights and do not apply newly developed management prescriptions that differ from prescriptions already ascribed to those rights.	
IPAMS	O-14	AT65 (LAT-1)	The DEIS provides no specific analysis to evaluate and justify the preferred actions as the least restrictive necessary and does not document the scientific basis for the proposed oil and gas restrictions. (As per IMs 2003-234 p.4 and 2003-233 p.2).	In the absence of specifics, we are unable to respond to your comment.	
IPAMS	O-14	AT67 (LAT-3)	BLM must develop reasonable alternatives that understand the effects of existing stipulations. BLM should consider outcome-based solutions including	Alternative D and the analysis thereof in Chapter 4 reflect the impacts of existing stipulations on the various resources and land uses within the Vernal	

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			performance –based operating standards.	Planning Area (VPA). Where existing stipulations are carried forward into proposed action alternatives, these impacts are analyzed and disclosed in Chapter 4 as well. The goals and objectives contained in Chapter 2 for each resource and land use represent the desired outcome of the BLM for management actions within the VPA.	
IPAMS	O-14	AT70 (LAT-6)	The additional acres subject to timing limitations under Alternative A limit cost-effective operations by oil and gas developers.	Comment noted.	
IPAMS	O-14	AT71 (LAT-7)	Alternative B should be modified once the full effects of oil and gas management are understood.	Alternative B represents part of the range of alternatives that the BLM must consider in developing its land use plan. The potential effects of management decisions under each alternative on minerals and energy development are discussed in Section 4.8 of the PRMP/FEIS.	
EOG Resources	O-17	AT32 (AT-Y)	Areas of concern that are not adequately addressed in lease stipulations have and will continue to be addressed in site-specific COAs and/or project-specific EAs or EISs, the proposed additional restrictions and, in some cases, outright disregard for oil and gas industry's valid existing rights proposed in Alternative A and or C are unwarranted. Alt B is much more consistent federally mandated multiple use management of the public lands.	All management actions proposed under all alternatives recognize valid existing rights and do not apply newly developed management prescriptions that differ from prescriptions already ascribed to those rights.	
EOG Resources	O-17	AT36 (AT-CC)	Alts B and D would not expand the existing ACEC to the eastern side of the river but would retain the NSO designation the NSO stipulation for the 8470 acre western side of the river. EOG does not support this NSO designation for the reasons discussed in SD-V.	Comment noted.	
EOG Resources	O-17	AT37 (AT-DD)	No specific limitations on oil and gas development are identified in the analysis, however, EOG remains concerned about the potential implementation of such measures that may be planned but are omitted from	See Appendix G for the relevance and importance criteria for the Four Mile Wash ACEC.	

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			the analysis or are yet to be developed in a future comprehensive integrated activity plan should this ACEC (Four Mile Wash) be officially designated. Given that Alternatives A and B particularly A do not include this proposed ACEC, EOG questions whether the character of this area fully meets criteria for designation as an ACEC.	<p>As per BLM Manual 1613 – Areas of Environmental Concern, designation is based on whether or not a potential ACEC requires special management attention in the selected plan alternative (which is determined through analysis). After completing the analysis of the effects of each alternative the manager selects the preferred alternative which best meets the planning criteria and the guidance applicable to the area.</p> <p>Future integrated activity plans must tier off of decisions made in the RMP. Therefore, they may have more detailed management prescriptions but these decisions would not conflict with the RMP.</p>	
EOG Resources	O-17	AT38 (AT-EE)	Alternatives A and B would permit leasing of culturally sensitive lands in the Four Mile Wash and other areas, with Timing and Controlled Surface Use. Because Alternative C would impose greater impacts on oil and gas development by closing the area to leasing, EOG does not support this alternative.	Comment noted.	
EOG Resources	O-17	AT39 (AT-FF)	EOG supports adoption of Alternative B as amended per the foregoing comments, as the most reasonable alternative in compliance with federal laws concerning multiple use and the encouragement of domestic and oil and gas exploration and development pursuant to lease mitigation measures that are scientifically justifiable and the least restrictive as necessary.	Comment noted.	
Howard County Bird Club	O-18	AT15 (AT-G)	Alternative A is severely unbalanced. Only 137,000 acres would be either closed or leased with NSO stipulations (7 percent). We urge that lands with high wildlife values and wilderness characteristics not be leased.	Alternative A blends proposed management decisions from Alternatives B, C and D. In general, such decisions affect a compromise between the greater levels of unrestricted or lightly-restricted development provided for under Alternative B and the lesser levels of such restrictions provided for	

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				under Alternative C.	
Howard County Bird Club	O-18	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
James W. Bunger and Associates	O-19	AT10 (AT-B)	Would like to recommend that the BLM adopt Alternative B as the next management plan.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	AT100 (R-AT10)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“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.”</p> <p>There is no record of oil and gas development “permanently scarring” the landscape.</p>	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.	X
Vermillion Ranch Limited Partnership	O-33	AT101	<p>Strike the entire statement beginning with</p> <p>“The noise of construction and operation of producing wells...” and ending with “Given the number and spacing of industrial facilities, it would be difficult to escape the adverse effects on solitude and primitive recreation throughout the areas having wilderness character.”</p> <p>This section is improperly written. First, for the WSAs the discussion with respect to mineral development is flatly wrong. Leases issued in WSAs were subject to a contingent development stipulation. Congress prohibited leasing in WSAs in 1989. 30 U.S.C. §226-3.</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 opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/EIS.</p>	

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			Thus, this section is misleading and inaccurate. If there are producing wells in "wilderness," it is not wilderness or a WSA.		
Vermillion Ranch Limited Partnership	O-33	AT102 (R-AT11)	<p>Strike the entire statement beginning with</p> <p>"It can be expected that as a result of cumulative effects..." and ending with "Non-WSA Lands with Wilderness Characteristics, and Non-WSA Lands Likely to have Wilderness Characteristics."</p> <p>Since leasing has been prohibited in WSAs, this statement is inaccurate. It would only apply to the now illegal WIAs. These areas have already been determined to not have wilderness character. Congress can and, often has, designated areas as wilderness that did not meet the strict definition of wilderness.</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 opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/EIS.</p>	
Vermillion Ranch Limited Partnership	O-33	AT103 (R-AT12)	<p>Modify the title of the table as follows</p> <p>"TABLE 4.14.4 ALTERNATIVES IMPACTS TO OTHER LANDS PROPOSED FOR WITH WILDERNESS CHARACTER"</p> <p>To the extent that the RMP needs to address leasing in the former wilderness inventory areas, it cannot fairly describe them as areas having "wilderness character." The public and local governments have consistently objected to these designations and characterizations. It is more accurate to say that these areas are proposed for wilderness designation in pending legislation before Congress.</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 opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/EIS.</p>	

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				Section 3.22 in the PRMP/FEIS provides a detailed description of the non-WSA lands with wilderness characteristics. This section clearly describes the debate regarding these designations.	
Vermillion Ranch Limited Partnership	O-33	AT87 (R-AT13)	<p>Strike the entire statement beginning with “New surface disturbance within crucial mule deer winter range...” and ending with “All surface disturbance within sagebrush habitat on crucial mule deer winter range would be reclaimed or enhanced at a ratio of 1.5 to 1.”</p> <p>The DEIS does not disclose the basis for the 560 acres per township. This is less than .02% of the township and cannot be justified on any scientific basis. It would violate valid existing rights and BLM energy direction as well. It should be deleted.</p>	Under Alternative A, disturbance within sagebrush habitat on crucial deer winter range would be reclaimed at or enhanced at a ratio of 1.5:1. Alternatives C and E still propose a 3:1 ration and a total surface disturbance allowance of 560 acres per township.	
Vermillion Ranch Limited Partnership	O-33	AT90 (R-AT2)	NEPA requires a federal agency to consider a range of reasonable alternatives. 40 C.F.R. §1502.14. While the RMP identifies four alternatives, there is little difference among the four alternatives, because BLM assumes that all of the new resource development restrictions apply to all of the alternatives. These standards, guidelines, and policies are not required by law but adopt a variety of protective measures aimed at prohibiting land uses that might disturb vegetation, startle wildlife, or affect any resource. Even if these restrictions had factual or scientific merit, there is no legal basis to apply all of the restrictions to all of the alternatives. By doing so, it assures that the EIS does not actually measure the cost of these restrictions on economic uses, energy production, or other social and economic costs.	<p>The Land Use Planning Handbook, H-1601-1, requires consideration of many factors in the development of alternatives (i.e. meet the purpose and need for the action; meet the goals and objectives for the plan; can be feasibly carried out based on cost, logistics, technology, and social and environmental factors; represents a different land use plan that addresses and/or resolves the planning issues; decisions may be common to some or all of the alternatives; components of each individual alternative must be complementary; and developed in an open, collaborative manner to the extent possible). With cooperators assistance and public input, BLM has met the handbook requirements.</p> <p>The resource development prescriptions outlined in the RMP are not identical across all alternatives as</p>	

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				suggested by the comment. Each alternative incorporates various levels of restrictions, from little or no restriction to greater restriction. Tables 2.1.1 through 2.1.27 in the PRMP/FEIS provide the range of alternatives for each management action. Also see comment responses AT61 and AT62.	
Vermillion Ranch Limited Partnership	O-33	AT91 (R-AT3)	<p>While courts have long deferred to agency selection of alternatives, courts will set aside an EIS when it fails to consider a sufficient range of reasonable alternatives. State of Wyoming v. U.S. Dept. of Agriculture, 277 F. Supp.2d 1197, 1223-35 (D. Wyo. 2002). In the case of the RMP, BLM is imposing discretionary restrictions that lack statutory or scientific basis. These restrictions violate</p> <p>BLM energy policy and related policy direction. Their application for all alternatives only illustrates the failure of the EIS to actually consider a range of reasonable alternatives.</p>	<p>The RMP presents four alternative proposals for managing public lands in the VPA. The alternatives were developed in response to the issues identified in the public scoping process and the planning criteria. The BLM recognizes that social, economic, and environmental issues cross land ownership lines and that extensive cooperation is needed to actively address issues of mutual concern. To the extent possible, these alternatives were crafted utilizing input from public scoping comments: Duchesne, Daggett, and Uintah County representatives and other cooperating agencies.</p> <p>Each alternative is a complete, reasonable, and implementable resource management plan, in which the different management practices are described, and the different ways of achieving balanced resource management under different management priorities are discussed.</p>	
Vermillion Ranch Limited Partnership	O-33	AT92 (R-AT4)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“This [preferred] alternative provides generally broad management direction to accommodate a wide variety of values and uses. The planning area would be managed to provide development opportunities while protecting sensitive resources. This alternative would</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</p>	

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			<p>identify land objectives and would authorize actions to achieve those objectives employs timing and sequencing of events through adaptive management based on sensitive resource indicators. It designates ACECs and recommends sections of two rivers for Wilde and Scenic designation.”</p> <p>The RMP should identify the desired outcome or land management objective and give managers the flexibility to achieve the objective. As written, the RMP imposes numerous prescriptions that prohibit otherwise lawful uses without any assurance that the restrictions will achieve any identified land resource objective.</p>	<p>the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/EIS.</p> <p>Chapter 2 identifies the goals and objectives common to all alternatives for all resources addressed in the PRMP/FEIS. The management prescriptions outlined in the alternatives of the RMP were developed to meet these goals and objectives.</p>	
Vermillion Ranch Limited Partnership	O-33	AT94	<p>Modify the following statement as indicated by the bolded additions and strikethrough deletions:</p> <p>“Construction and operation of oil and gas wells and associated support facilities, including roads, surface and buried pipelines, and compressor stations would degrade the roadless and natural character of areas containing wilderness values. In addition to site-specific surface disturbance, the cumulative number of wells and density of spacing would change the natural landscape to a more developed an industrial landscape.” landscape.</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 opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/EIS.</p> <p>Roadless and natural character are part of the definition of wilderness, 16 U.S.C. §1131. The BLM can manage to protect individual characteristics that</p>	

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				are found in the definition of wilderness but outside of the WSAs, the BLM cannot manage to protect wilderness values as such. Settlement in State of Utah v. Norton. The areas affected were studied on several occasions and removed from WSA classification due to roads, development and lack of wilderness character.	
Vermillion Ranch Limited Partnership	O-33	AT94 (R-AT1)	The RMP appears to move BLM land management planning from outcome based approach to highly prescriptive, especially as it may apply to management of livestock grazing, wildlife habitat, and energy development. This essentially denies field managers the necessary flexibility to achieve a sound outcome based on the specific circumstances. Instead, all permits must conform to the plan and any deviation would require a plan amendment or revision. 43 C.F.R. §1610.5-3. The RMP should set outcome based goals and identify or authorize adaptive management to achieve these objectives or outcomes. The prescriptive approach found throughout the RMP will make it very difficult to follow this approach, since any change will require a plan amendment or revision.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	AT97 (R-AT7)	Alternative A Strike the entire statement beginning with “Alternative A, new surface disturbance up to 560 acres per township...” and ending with “Similar decisions are unspecified under Alternative D-No Action.”	The BLM declines to make the 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 the current data and analysis is incorrect. The suggested change expressed personal opinions	

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				<p>or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/EIS.</p>	
Vermillion Ranch Limited Partnership	O-33	AT98 (R-AT7)	<p>The RMP fails to discuss the scientific basis for the surface disturbance limit. The 560 acres represents less than 2% of the township. This limit could have a significant impact on valid existing rights and energy development that is not adequately disclosed or discussed. This standard also violates IM 2003-237.</p>	<p>IM 2003-237 is probably the wrong reference as that memorandum was entitled "Wildland Fire Emergency Stabilization and Rehabilitation Policy and Procedures per May 5, 2003, Department of the Interior Memorandum". It is believed that the commenter was referencing IM 2003-233 or 2003-234, both of which dealt with integration of the Energy Policy Conservation Act (EPCA) into planning.</p>	
Outdoor Industry Association	O-35	AT58 (JAT-9)	<p>RMP lacks balance. It places an inordinate focus on benefits of developing oil and gas and de-emphasizes the economic, historical and cultural benefits of recreation. This is in clear conflict of BLM's mandated mission to manage lands for multiple uses. Given lack of attention to and detail on potential for and benefits from recreation, we cannot endorse any alternatives. The draft should be amended to reflect:</p> <ol style="list-style-type: none"> 1) the need to protect recreation and visual resources such as the Sand Wash area above Desolation canyon 2) the economic benefits to local communities from the recreational opportunities that bring visitors and residents to the Vernal FO 3) cultural and heritage resources of the Vernal area 4) the societal and health benefits of recreation to the American people. 	<p>The Draft EIS evaluated a range of alternatives in detail to assure a balanced approach was recommended that allows opportunities for mineral exploration and production and for the BLM to protect the resources and resource uses. A supplement to the Draft RMP was later issued to consider Non WSA lands with wilderness characteristics. The management actions proposed under the Alternatives offer management flexibility to ensure resources are protected while allowing for acceptable levels of mineral development. Additionally, as exploration and production activities proceed, impacts (short and long term) will be evaluated in subsequent NEPA documents.</p> <p>The Sand Wash area above Desolation Canyon would be open to OHV use on designated trails only and standard mineral lease stipulations under Alternatives A and B. It would be closed to OHV travel and mineral and energy leasing under Alternative C and open to manage OHV use and subject to timing and controlled surface use</p>	

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				<p>stipulations under Alternative D. Under all alternatives, Sand Wash would be included in existing (to-be-carried-forward) or proposed ACECs and classified as VRM Class II and/or III.</p> <p>Management prescriptions for ACECs can be found in Table (Special Designations – Areas of Critical Environmental Concern) and Table 2.1.23 (Visual Resource Management) of the PRMP/FEIS.</p> <p>The contribution of recreation to the economy of the Vernal Planning Area is addressed in Section 4.12 of the PRMP/FEIS.</p> <p>Provisions for the management of cultural and heritage resources in accordance with federal law and BLM policy are outlined in Table 2.1.4 (Cultural Resources) of the PRMP/FEIS.</p>	
Outdoor Industry Association	O-35	AT59 (JAT-10)	<p>The 4 Alternatives under the plan do little to protect and virtually nothing to promote land-based recreational activities away from the sites and sounds of oil and gas production and/or motorized recreations. Alternatives offer few if any choices available to truly advance the concept of multiple use, the ROS or the interests and needs of quality outdoor recreation beyond those enjoyed by OHV users. Oil and gas leasing range from 90-97% of total acreage. Similarly OHV use loses access to less than 1.5 % of the total acres under preferred Alt vs. No Action Alt. It is only in suitability for Wild and Scenic river designation that a true range of options can be seen across the alternatives.</p>	<p>See comment response AT58.</p> <p>Additionally, the BLM cannot "promote" one land use over another, but must be a neutral party in considering multiple land uses. While there may be limited difference in the number of miles of designated OHV routes between Alternatives A, B, and C, these alternatives provide a reasonably range of OHV management options and all offer significantly more opportunities for land-based recreation away from OHVs than the current management situation (Alternative D) by restricting travel to designated routes. The RMP also includes the designation of several Special Recreation</p>	

Alternative Development					
Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				Management Areas under Alternatives A and C.	
National Outdoor Leadership School	O-37	AT52 (JAT-3)	The Alternatives do not match the results of the scoping phase. This planning process is not "issue driven". Alternative actions should be formulated to resolve the planning issues and priorities as defined during scoping. This discrepancy weakens the draft's assertions that it will "ensure the continued availability of quality outdoor recreation opportunities and experiences" listed during the public input process.	<p>The commenter does not provide an example of an issue from scoping that is not addressed in the plan.</p> <p>Planning issues are discussed in Chapter 1 of the PRMP/FEIS. Management Common to All and the alternatives are proposed prescriptions to address the identified issues.</p>	
National Outdoor Leadership School	O-37	AT53 (JAT-4)	Current negative impacts of mineral development on world-class recreational and visual resources such as the Lower Green River segment were not addressed in any Alternative with location-specific consideration. More generally, nothing in the Alternative actions serves the draft's goal to "establish limits of acceptable change or other environmental indicators to provide for adaptive management" of recreation resources.	<p>Past, present/current, and reasonably foreseeable future impacts from minerals and energy development as well as other land uses on recreation within the Vernal Planning Area are addressed in Section 4.8.2.4 in the PRMP/FEIS.</p> <p>Provisions for recreation management are outlined in Table 2.1.13 (Recreation Resources) in the PRMP/FEIS.</p>	
National Outdoor Leadership School	O-37	AT54 (JAT-5)	Environmental impacts were evaluated against an outdated baseline reference. No rationale provided to explain why environmental impacts of alternatives were compared to the impacts of the no-action alternative. This is a serious bias because it positions the 2 outdated plans as a baseline reference throughout the EIS, even though the no action alternative already leans heavily toward an emphasis on resource uses and especially oil and gas development.	NEPA requires that the No Action alternative be analyzed in any EIS. The No Action alternative would be our baseline reference as that provides the current management direction.	
National Outdoor Leadership School	O-37	AT55 (JAT-6)	Other relevant alternative actions were not considered. No alternative was reviewed that would have limited the growth rate of mineral development in specific areas to maintain existing recreation opportunity	The Draft RMP presents four alternative proposals for managing public lands in the VPA. A supplement to the Draft RMP was later issued to consider Non WSA lands with wilderness	

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			<p>spectrum in the district. Alt C emphasizes the natural succession of ecosystems, but none of the alternatives indicates BLM's concern for the future of recreation. The result is the draft does not offer a true range of choices reflecting the BLM's multiple use mission. With Alt C-the most restrictive alternative- 97.4% of potential wells get drilled and 90.6% percent of the land gets developed for its oil and gas potential. We feel that areas closed to oil and gas development could be increased with no significant impact on employment, income and local government revenues yet with a substantial difference made in landscape protection. The BLM is clearly not considering any substantial tradeoffs in an effort to protect natural landscape values that are threatened by oil and gas development.</p>	<p>characteristics. The alternatives were developed in response to the issues identified in the public scoping process and the planning criteria. The BLM recognizes that social, economic, and environmental issues cross land ownership lines and that extensive cooperation is needed to actively address issues of mutual concern. To the extent possible, these alternatives were crafted utilizing input from public scoping comments, Duchesne, Daggett, and Uintah County representatives and other cooperating agencies.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the BLM lands ultimately will be managed, considering all the values and potential uses of these lands and the other lands within the planning area.</p>	
National Outdoor Leadership School	O-37	AT56 (JAT-7)	<p>When analyzing impacts of alternative actions, the BLM did not adequately measure "the effects of actions from the perspective of future generations in addition to considering their immediate effects." Specific parts of this analysis, especially pertaining to impacts on recreation resources and the state economy at large, should have been quantified.</p>	<p>Section 4.23 in the PRMP/F considers the cumulative impacts of past, present, and reasonably foreseeable future actions on resources and land uses within the Vernal Planning Area. This analysis projects into the future to the extent that it is reasonable and prudent.</p>	
National Outdoor Leadership School	O-37	AT57 (JAT-8)	<p>BLM Vernal recognized, after scoping phase, the presence in the planning area of world-class scenery and recreational resources needing protection, yet none of the alternatives provide for protective management of such sensitive resources. The final draft should follow the direction of new BLM handbook by integrating Visual and Recreation Resource protection and proposing a formula that will allow for a continuity of the existing ROS.</p>	<p>The RMP is in accordance with BLM Manual 8400.06(2) Visual Resource Management.</p>	

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Center for Native Ecosystems	O-38	AT50 (JAT-1)	<p>The BLM has not provided a reasonable range of Alternatives, has not followed its own manual, is contributing to the need to list a species under ESA and fails to follow FLMPA's mandates to give priority to the designation of ACECs and to manage for multiple uses, including for wildlife habitat. Every Alternative, even C would open more white tailed prairie dog habitat to oil and gas leases and protective stipulations would apply even less habitat than they do now. In fact, the preferred alternative would decrease the proportion of habitat by 30% as compared to the no action alternative. Rather than adopting new RMPs that would provide protection equivalent to ESA listing as the Service asserted, the BLM plans to dramatically decrease the meager protections for oil and gas drilling that currently apply to prairie dogs in the Vernal Field Office. It is hard to know whether ACEC designation under these terms would really offer any benefits.</p>	<p>The commenter did not include any suggestions for 'a range of alternatives' that would be adequate. CEQ regulations require that the lead agency "rigorously explore and objectively evaluate all reasonable alternatives" (40CFR 1502.14). This includes a range of alternatives applicable to the nature and timing of the proposed action (Natural Resources Defense Council, Inc. v. Adams, 566 F.2d 419, 425 (2d Cir. 1977)). An agency is not required to consider "every extreme possibility which might be conjectured" (Carolina Env't. Study Group v. United States, 510 F.2d 796, 801 (D.C. Cir. 1975)). The public has opportunity to propose alternatives during the public scoping process. During the scoping process, which involved both the public and agencies, an array of alternative approaches to the proposed action were explored that could potentially resolve scoping issues or at least reduce the magnitude of effects to one or more environmental resources. However, some of these potential alternatives were impractical, did not adequately meet the purpose and need for the project, or resulted in little or no environmental benefit when compared to the proposed action or another comparable alternative.</p>	
Center for Native Ecosystems	O-38	AT51 (JAT-2)	<p>Page 4-234 states that under all Alternatives, large areas associated with ferruginous hawk nesting sites, Mexican spotted owl habitat and greater sage grouse habitat would be open for oil and gas and mineral development. This cannot be considered a reasonable range of Alternatives.</p>	<p>While some areas associated with ferruginous hawk nesting sites, Mexican spotted owl habitat and greater sage grouse habitat would be open for oil and gas and mineral development, site-specific surveys for the actual presence of such habitat will be undertaken at the project development NEPA stage. Should such habitat be identified within the proposed development area, stipulations and/or conditions will be attached to the development lease or permit outlining the best management practices</p>	

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				and mitigation measures to be implemented in order to avoid, minimize, or mitigate for the impacts. Additionally, seasonal and spatial buffers for the species identified in the comment are included under all alternatives.	
National Trust for Historic Preservation	O-41	AT72 (LAT-8)	We support Alternative C because it comes closest to balancing multiple uses including the conservation of significant cultural resources and landscapes with recreation and energy development. Alternative A fails to incorporate BLM's responsibilities under NHPA and Executive Order 13287.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	AT68 (NAT9)	The restrictions and travel plan included in the Greater Dinosaur/Book Cliffs Heritage Plan should be adopted as the preferred alternative.	See comment response AT1.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	AT76 (NAT1a)	The Final RMP should allow development and human use in a way that promotes the persistence of large blocks of intact habitat rather than allowing continued fragmentation.	<p>Table 2.1.21 (Special Status Species) and Table 2.1.26 (Wildlife and Fisheries Resources) in the PRMP/FEIS address habitat fragmentation.</p> <p>Table 2.1.21 under Goals and Objectives states:</p> <p>"Mitigate or reduce long-term habitat fragmentation through avoidance and site-specific reclamation to return areas to productive levels."</p> <p>Table 2.1.26 under Management Action s Common to All states:</p> <p>"Reduce habitat fragmentation by requiring oil and gas field development plans and encouraging such</p>	

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				activities as well clustering, multiple drilling from a single pad, utilization of existing roads and pipelines, and other measures to minimize surface impacts.”	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	AT84 (NAT8)	The Wilderness Society specifically recommends that the BLM conduct a sufficient cumulative impact analysis, taking into account activities throughout the eco-region, and then take appropriate action to avoid unnecessary environmental consequences, including further restricting areas open to oil and gas development and off-road vehicle use and adopting additional protective measures that will lessen the impacts of these activities.	The cumulative effects analysis is presented in Section 4.23 of the PRMP/FEIS. Extension of the cumulative effects analysis outside of the Vernal Planning Area is outside the scope of the PRMP/FEIS.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	AT88 (NAT12)	The Vernal RMP should identify all riparian and wetland areas, assess their current health and level of function, and analyze how management prescriptions in the various alternatives of the plan will affect the ecological function of such areas.	The current condition of riparian and wetlands within the Vernal Planning Area (VPA) are described in Section 3.11 of the PRMP/FEIS. Potential impacts to these resources are disclosed in Section 4.11 of the PRMP/FEIS. The RMP establishes broad policy across the VPA. Individual riparian areas and wetlands and potential impacts to them are addressed in area-specific or development level environmental studies (e.g. NEPA documents).	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	AT89 (NAT13)	It is particularly key that new or potential wilderness units are joined together with existing protected (or other specially designated) areas like ACECs to ensure that large-scale ecological disturbance can proceed naturally.	The BLM only has the authority to identify lands with wilderness characteristics and cannot designate such lands. ACECs and other special management designations can only be implemented where specific criteria for relevance and importance of resource values are met, and cannot be used to link wilderness units together in the absence of such resource values.	
Wilderness Society, Wild Utah Project, Center for	O-46	AT93 (NAT17)	The alternative we propose that BLM add to this analysis would propose, based on the allotments indicated as failing to meet standards, changes in season of use and stocking numbers should it be	Comment noted.	

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Native Ecosystems			determined that will lead to areas and streams meeting rangeland health standards. For those allotments where standards are met, periods of use and stocking levels should be based on current forage production capability using the methods described earlier in these comments. The results would be a table like that in Appendix L but with stocking numbers and seasons of use that reflect ecological needs. Wild Utah Project offers its services to help BLM construct this alternative. We argue that this alternative, the multiple use alternative, is the only alternative presented that would lead to rangelands in this planning area meeting agency requirements. The table present in Appendix L show clearly that grazing use decided in the preferred alternative would be in violation of a number of fundamental agency requirements and perform a long term deserve to the ranching community and wildlife.		
Southern Utah Wilderness Alliance	O-47	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Southern Utah Wilderness Alliance	O-47	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses. Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources) in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.	

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				See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.	
Southern Utah Wilderness Alliance	O-47	AT40 (AT-GG)	The DRMP/DEIS fails to do a proper alternatives analysis under NEPA. It fails to comply with NEPA because it failed to explore and objectively evaluate all reasonable alternatives. The range of alternatives discussed only differed on minor matters and provided no real alternatives other than the relatively minute differences between A, B and C. It fails to include an alternative that would preclude ORV use in WSAs, proposed and other areas the VFO has found to have wilderness qualities.	<p>ORV use is precluded within WSAs in all alternatives.</p> <p>The RMP presents four alternative proposals for managing public lands in the VPA. The alternatives were developed in response to the issues identified in the public scoping process and the planning criteria. The BLM recognizes that social, economic, and environmental issues cross land ownership lines and that extensive cooperation is needed to actively address issues of mutual concern. To the extent possible, these alternatives were crafted utilizing input from public scoping comments, Duchesne, Daggett, and Uintah County representatives and other cooperating agencies.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Southern Utah Wilderness Alliance	O-47	AT41 (AT-HH)	The DRMP fails to consider and fully analyze alternatives that adequately address wilderness, oil and gas development, ORV management and other resources.	See Table 2.1.20 (Special Designations – Wilderness Study Areas), Table 2.1.9 (Minerals and Energy Resources), Table 2.1.2.1.3 (Recreation Resources), and Appendix K for management prescriptions and impacts analysis for the named resources and land uses. Discussions of other resource management provisions and impacts analysis are located elsewhere throughout Chapters	

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				2 and 4.	
Southern Utah Wilderness Alliance	O-47	AT42 (AT-II)	Include an explanation in the FEIS as to why an alternative, such as the Greater Dinosaur/Book cliffs Heritage Plan was not analyzed and approved by the BLM.	See comment response AT1.	

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State of Utah	G-1	CR20	<p>The State of Utah is concerned by the open-ended nature of the comment on page 2-7 which states that the BLM, as part of its normal management of cultural resources, will "reduce or eliminate imminent threats from natural or human-caused deterioration or conflict with other resources." What imminent threats? How will conflicts with the unstated threats be resolved? How cost-effective is it to reduce or eliminate natural deterioration? Most importantly, how will the balance between cultural resources protection and other legitimate resource uses be achieved, and how does this balancing process differ from the normal Section 106 consultation process involving the State Historic Preservation Office? The state asks the BLM to consider the language recently added to the state historic law concerning the need for balance in the protection of cultural resources and to clarify the intent of this proposed management statement.</p>	<p>The statement on page 2-7 of the Draft RMP refers to the BLM's ongoing policy of cultural resource stewardship and adherence to the mandates of federal legislation such as, but not limited to, the National Historic Preservation Act. While Section 106 of the Act requires the BLM to consider the avoidance, minimization, or mitigation of impacts to National Register-eligible resources, Section 110 requires the BLM to pro-actively manage for preservation such resources, as known to exist, under their jurisdiction. This management requires addressing threats/impacts to the resources that compromise their eligibility for the National Register. These threats may come from human-caused disturbances or natural processes. The feasibility and cost effectiveness of ameliorating natural deterioration would be assessed on a case-by-case basis and in consideration of whether or not the deterioration is altering the characteristics of the resource that render it eligible for the National Register.</p> <p>Note: The text from page 2.7 of the Draft RMP is now located in Table 2.1.4 (Cultural Resources) of the PRMP/FEIS under Management Common to All Alternatives.</p>	
State of Utah	G-1	CR21	<p>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</p>	<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</p>	X

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			<p>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>	<p>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>	
State of Utah	G-1	CR22	<p>The discussion of the effects of minerals decisions on cultural resources (page 4-44) states, "short-direct effects would entail surface disturbance and even destruction of archaeological sites and features if relevant cultural resource laws and agency guidelines are not followed, or if errors occur during the development process." The next sentence indicates that long-term direct effects include the "physical alteration or elimination of archaeological sites as they are mitigated through data recovery or other on-site means when avoidance of the sites is not possible." These descriptions are muddled and compare apples and oranges. The first sentence states that cultural</p>	<p>The presumption of the RMP/EIS is that the BLM and BLM authorized undertakings will comply with federal legislation, including Section 106 of the National Historic Preservation Act, and therefore, short-term effects on individual cultural resources determined eligible for the National Register of Historic Places would be minimal, if not non-existent. However, the RMP/EIS recognizes that occasional errors do occur wherein resources slated for avoidance are inadvertently impacted or previously unidentified resources, such as those below the ground surface, are encountered during construction in an area that was inspected for</p>	

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			<p>resources will be affected by a failure to follow the law. Because the provisions of the final RMP are approved under the general assumption that the BLM and others will follow the law, including the Section 106 process, does this sentence mean therefore state that there are no short-term effects from mineral development? The second sentence implies there are unspecified difficulties with data recovery as a mitigation tool. If avoidance of a site is not possible, data recovery and other mitigation processes are employed to eliminate the adverse impact of the planned disturbance. Therefore, the resultant physical alteration or elimination of the site is not a negative effect. The State of Utah believes the discussion of impacts to cultural resources that is currently in the document represents a bias away from the correct implications of Section 106 and cultural resource mitigation.</p>	<p>surface evidence of cultural materials. It is to these types of situations that the RMP statement in your comment refers.</p> <p>Data recovery is used to mitigate adverse effects to individual cultural resource sites, and therefore, is not considered to be an adverse effect to the subject site itself. However, data recovery that results in the elimination of the physical manifestation of the site does indeed alter in the larger cultural landscape by removing a component of it.</p>	
Ute Tribe of the Uintah and Ouray Reservation	G-26	CR16	<p>The Ute Tribe requests that the Tribe be informed at least two weeks in advance of all future cultural resource surveys, so that Tribal elders can participate in the surveys. The Tribal elders can provide valuable information on locations of sacred areas, medicinal plants, and other areas of cultural importance to the Tribe that may potentially be impacted by surface disturbance on Tribal lands. The RMP/EIS should specify that Tribal elders would participate in evaluation of the cultural importance of a site to the Tribe, where surface-disturbing activities are proposed.</p>	<p>The BLM declines to include language in the proposed RMP that stipulates that the Tribe would be given a 2-week advance notice of cultural surveys and participate in evaluating a site's cultural importance to the Tribe where surface disturbances are proposed.</p> <p>In accordance with the National Historic Preservation Act, Executive Order 13175, other federal legislation and BLM policy, the BLM Vernal Field Office (VFO) will continue to consult with Native American Tribes regarding any undertaking of the VFO that has the potential to affect resources that are important to the Tribes. This consultation affords the Tribes the opportunity to identify for the BLM any concerns and suggest any additional identification or evaluation measured deemed</p>	

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				appropriate to the undertaking. In addition BLM will comply with Executive Order 13007, Indian sacred sites, consultation and also comply with manuals 81-20 and H-8120-1.	
Ute Tribe of the Uintah and Ouray Reservation	G-26	CR17	Impacts to important sacred or cultural sites should be avoided.	Comment noted.	
Ute Tribe of the Uintah and Ouray Reservation	G-26	CR18	<p>The Ute Tribe requests that the following Tribal requirements and stipulations be included in the RMP and in Appendix K (surface stipulations applicable to all surface-disturbing activities), as appropriate, in order to ensure that disturbance to important cultural sites on Tribal lands is avoided:</p> <p>The Tribe shall be consulted prior to any surface disturbance on Tribal lands to ensure that habitats for plants of medicinal or cultural value are not disturbed. If a specific location contains such plants, no surface occupancy would be allowed;</p> <p>Cultural or archaeological sites that are determined by the Tribe to be important historical sites and/or gathering places would be unavailable for surface occupancy;</p> <p>No surface occupancy, including vehicular traffic, would be allowed in sacred areas or on Tribal hunting grounds on the Uintah and Ouray Reservation; and</p> <p>No vehicular traffic shall be allowed on Saturdays and Sundays between Memorial Day and Labor Day for annual summer religious festivals.</p>	<p>Information related to these requests was not provided as a part of the comments from the Tribe, so the VFO is unable to determine where these areas are that the Tribe is concerned about.</p> <p>A meeting was held with Tribal representatives on 12-9-2005 to clarify the comments provided. During the meeting it was stated that all of the comments shown were in regard to Tribal trust surface lands, except for the cultural site comment. As such, any access across Tribal trust surface would be negotiated with Tribe, thus not needing to be addressed within the proposed RMP. Mitigation to important cultural sites will be determined after consultation with the Tribes.</p>	
Ute Tribe of the Uintah and Ouray Reservation	G-26	CR19	The RMP states that the higher number of acres designated in SRMAs under Alternatives A and C would provide greater positive impacts to cultural resources. However, the document (at page 4-50) also	Mitigation of impacts to important cultural resources and sacred sites would be developed at the time of site-specific proposals during the NEPA analysis process.	

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			<p>states that the greater level of human activity associated with increased recreation in these SRMAs would result in increased levels of vandalism and looting of cultural resources. The Ute Tribe is concerned with the high level of recreation proposed under Alternatives A and C. We disagree that human activity in a "managed setting" would limit vandalism and looting of cultural resources of high importance to the Tribe. We believe that the greater volume of people using the area for recreation would result in increased adverse impact to cultural resources. Therefore, we recommend that cultural surveys be conducted in areas proposed for SRMAs, so that areas with important cultural and sacred sites would be identified and closed to recreational activities.</p>		
Ute Tribe of the Uintah and Ouray Reservation	G-29	CR55	<p>The areas of Chandler Canyon, the Green River Corridor, and steep canyon country of the connected drainages should be designated as areas of no leasing/no activity as they are highly culturally and aesthetically sensitive.</p>	Comment noted.	
Bill Walsh & Shirley Weathers	I-24	CR23 (CR-A)	<p>The BLM's 1994 Nine Mile Canyon SRCMP called for the Canyon to be nominated to the NRHP. It was signed by David Howell, Ron Trogstad, and David Moore for the VFO. It is now 2005 and the nomination has not been completed. We believe the VFO can facilitate progress. We recommend that the goal of submitting the NRHP nomination be written into the RMPs of Vernal and Price BLM.</p>	<p>The BLM is supporting the preparation of the National Register nomination of Nine Mile Canyon through the Nine Mile Canyon Coalition. It is anticipated that the nomination will be submitted to the Utah State Historic Preservation Office for consideration and submission to the Keeper of the Register prior to the issuance of the final RMP. As such, the inclusion of a specific management goal for the nomination of Nine Mile Canyon would be obsolete by the time the PRMP/FEIS is adopted. The Draft RMP, on page 2-8, does include the Management Common to All goal to "...nominate eligible sites, districts, landscapes, and traditional cultural properties for inclusion in the National Register of Historic Places..."</p>	

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				<p>Note: The text from page 2.8 of the Draft RMP is now located in Table 2.1.4 (Cultural Resources) of the PRMP/FEIS under Management Common to All Alternatives.</p> <p>The VFO can only address the comment in the context of the RMP for the Vernal Planning Area and cannot require inclusion of the information requested in the RMP of another field office. We suggest you address a similar comment to the Price Field Office.</p>	
James R. Allison	I-25	CR1	The DEIS demonstrates overconfidence about archaeologists understanding of the distributions of archaeological sites, and, more specifically, it inappropriately generalizes the results of outdated, poorly designed sample surveys to estimate the numbers of sites likely to be affected under the different alternatives.	The BLM believes that the best available data was used to provide general estimates of site numbers. These numbers are then used in a comparative basis to assess the relative effects of each of the alternatives. Section 4.3 in the PRMP/FEIS notes that the method is not precise, and emphasizes that it is used to assess relative effects. In terms of assessing impacts of each alternative, the relative effect is more important than exact numbers of sites, and the method utilized, while admitted by the Final EIS to be inexact, is supported by the best available data as the surveys utilized are the only ones currently in the public domain. The method used is also replicable and non-arbitrary.	
James R. Allison	I-25	CR10	BLM should require inventory of all areas proposed for oil and gas leasing. Sample surveys may be adequate for evaluating whether exceptional numbers of sites, or sites of exceptional quality, make the area unsuitable for leasing, although complete inventory of the areas to be leased prior to the actual leasing would allow well pads and other facilities to be designed from the	The BLM's current practices require inventory of all areas proposed for oil and gas development prior to ground disturbance. These project-specific inventories typically follow upon programmatic level NEPA evaluations for field development, which consider the broader scope of the cultural landscape within the area proposed for development, but do not generally address	

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			beginning to avoid cultural resources.	<p>individual cultural resource sites.</p> <p>Data as analyzed in these documents are predicated upon numerous inventories in any given area of the Vernal Field Office and the experience of professionals in the field.</p>	
James R. Allison	I-25	CR11	The BLM should require, wherever feasible, practices that reduce the amount of ground disturbance from oil and gas development and reduce the amount of traffic accessing previously roadless areas along roads to oil and gas facilities.	<p>Standard lease terms and special lease stipulations call for the inventory and either avoidance of or mitigation of impacts to National Register-eligible or identified sacred/traditional resources. BLM further encourages the location of multiple wells on single drilling pads and the consolidation of access roads in order to reduce surface disturbances.</p> <p>Additionally, permits issued by the BLM authorize surface disturbance and travel only in those areas where cultural resources assessment has taken place and appropriate avoidance, minimization, or mitigation measures have been implemented.</p>	
James R. Allison	I-25	CR2	The DEIS greatly underestimates the numbers of sites that might be impacted under each of the alternatives. Section 4.3 of the DEIS includes a number of statements reflecting the uncertainty in the estimated numbers of sites that would be impacted by various management decisions, but always concludes that the numbers of impacted sites are relatively low.	<p>It is important to note that the estimations regarding cultural resource sites are designed to provide estimations of sites involved in resource decisions. Because of other laws and considerations that occur during the development of specific actions, sites identified and involved in actions are not necessarily impacted by those actions. Thus, the Final EIS more precisely discusses sites "involved" in management decisions, but not necessarily impacted. While the exact numbers of sites involved in decisions may be different than the numbers estimated in the Final EIS, the replicable estimation exercise does provide a relatively accurate order of magnitude estimation, and this estimation indicates relatively low numbers of sites are likely to be involved in the management</p>	

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				<p>decisions, even if the estimates are doubled or tripled. The numbers of sites used in relative assessments of management decisions are produced in a manner that is consistent and replicable, despite the inherent uncertainties involved in such estimations.</p>	
James R. Allison	I-25	CR3	<p>The problems with site density demonstrations are numerous, but they begin with the fact that the sample surveys used as justification are outdated and were so poorly designed to begin with that they cannot even be used to estimate site densities within their study area boundaries.</p>	<p>The sample surveys used for the site density model are currently the only models, to our knowledge, that are in the public domain. They therefore constitute the best available data. They are used in a replicable and consistent manner throughout the analysis. They are drawn from a variety of areas throughout the region, and thus, while not an ideal sample, do at least capture some of the variation in environments in the area.</p> <p>Modeling is based on parameters for a given area and is only applicable to that area. The wide variety of physical settings, site locations and site types make for a complex mix of predictors.</p> <p>Additional data is received daily, and the resulting agency database of site information is updated continually. The predictive model used in the RMP was based on the available data at the time the model was developed. Locational data from the numerous inventories completed in a given year, professional experience, and new data inputted into the NEPA process as EAs, EISs and projects are considered. These data are used to aid the manager in decision-making.</p> <p>Finally, professional archeologists with an extensive</p>	

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				background in this area combine that knowledge with the data derived from the ongoing and dynamic database for northeast Utah. An extensive and detailed library of references are also used by the professionals who specialize in archaeology.	
James R. Allison	I-25	CR4	Many of the sites recorded during the sample surveys are not recorded to current standards, and many sites that would now be considered eligible for the National Register were not considered eligible when they were recorded. The sample surveys thus almost certainly underestimate the number of significant sites.	<p>It is correct that some sites identified during the sample surveys used to construct the model were not documented to current standards nor evaluated according to current knowledge, the classification of sites as eligible or ineligible for the NRHP is irrelevant to the model used in the analysis for the RMP. The model employed to analyze relative proportionate impact by alternative calculates numbers of sites regardless of their NRHP-eligibility.</p> <p>As inventories are done, site forms are updated to bring those sites recorded in the past up to current standards. This data is then utilized in management of cultural resources.</p>	
James R. Allison	I-25	CR5	The problems with using these sample surveys are compounded by two erroneous assumptions: first, that they are generalizable to the entire area covered by the DEIS; and second, that they "identified the average number of sites per square mile in zones of high and low cultural resource sites."	See comment response CR3.	
James R. Allison	I-25	CR6	The specific value for high density site zones (4.87 sites per sq mile) significantly underestimates the actual densities of sites in true zones of high density. It is not clear in the DEIS how this figured was derived. The DEIS states that it is a conservative average of the Red Wash and Seep Ridge surveys, which found site densities ranging from 0.13 and 6.5 (which would give an estimate of approximately 3.32 sites per sq mile), so the average must be weighted, but the DEIS does not	The estimation of counts of sites per square mile in areas of low and high site density is based on an average of multiple surveys that included a low reading of 0.13 sites per square mile in low density zones the Red Wash II survey area and 6.5 sites per square mile in high density zones in the Seep Ridge survey area. Both averages are based on more than these two survey areas, they are given as the extremes in the DEIS to demonstrate the full	

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			<p>specify or justify. If these numbers are to be used, the DEIS should provide a better justification for them.</p>	<p>range. Because the primary focus is on relative effects (e.g. the percentage increase or decrease in numbers of sites involved in management decisions) rather than absolute numbers, the density estimates are actually less important than they might otherwise appear. While it might be possible to change the site density estimates, changing these estimates would not substantially change the relative outcomes nor affect the overall analysis.</p> <p>As the database is updated, this data is used by investigators, many of which have extensive experience in the region. Thus, an up-to-date site pool and reference library is available to these investigators. Management can base decisions on up-to-date information.</p>	
James R. Allison	I-25	CR7	<p>The real problem is that, in general, the state of archaeological inventory in the Vernal BLM district is not adequate for proper management of archaeological resources.</p>	<p>Inventory of a statistically valid sample of the 1.7 million acres of BLM lands within the VPA for the purpose of preparing the RMP is not feasible. For this reason, the BLM has used the best available data at the time this document was prepared to identify general management measures related to cultural resources. The BLM has included stipulations for the identification of cultural resource sites and the avoidance, minimization, or mitigation of impacts to those resources for land use activities permitted under the RMP.</p> <p>Federal law concerning cultural preservation mandates that in all applicable situations, e.g. ground disturbing actions, their effects are processed under existing laws, regulations and standards. The inventory is updated weekly and</p>	

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				this information is provided to the manager for decision making.	
James R. Allison	I-25	CR8	There are serious gaps in the cultural resource inventory data that make it impossible to properly integrate cultural resources into the planning process, and only way to remedy these data gaps is through additional inventory.	See comment response CR7. The data provided to managers are based on weekly inventories completed for projects and extensive EA and EIS documents. The documents are utilizing current data at all times. More inventory does not equate to proper management as the data is complete at the time of the decision by federal managers.	
James R. Allison	I-25	CR9	In general, concentrating OHV traffic onto designated routes, while restricting it elsewhere, will be beneficial to cultural resources, but it is important to first ensure that the routes being designated as open to OHV use do not contain cultural resources.	Routes being designated through the RMP are existing routes where disturbance has already occurred. No new routes are being proposed for construction. Impact assessments for the routes will be carried out as part of the implementation plan that will be prepared subsequent to the RMP.	
Paul J. Ebbert	I-161	CR15	Nine Mile Canyon needs special consideration. Prior to the last RMP, I was told by the then-BLM director that the area had no commercial value and therefore there was no threat to the unique archaeological and cultural resources. This is clearly not true. Please give Nine Mile Canyon real and meaningful protection.	Portions of Nine Mile Canyon would be designated as an Area of Critical Environmental Concern (ACEC) under all alternatives, though the specific acreage included in the ACEC under each alternative varies. This designation is based largely on the cultural resource values of the area. Details of the proposed acreages and stipulations for Nine Mile Canyon under each alternative can be found in Table 2.1.18 (Special Designations – Areas of Critical Environmental Concern) of the PRMP/FEIS.	
Bill Robinson	I-173	CR24 (CR-B)	The DRMP/DEIS fails to comply with the National Historic Preservation Act. Although the DRMP and DEIS discuss cultural considerations in regard to preservation of prehistoric artifacts and historic	Cultural Landscapes are an accepted means for managing sites and areas where a common theme of human land use has occurred. This is a management tool similar to a National Register	

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			landmarks, it does not adequately address the impact of its decisions upon rural agricultural customs and traditions in the region.	District where management is aware of special needs for the preservation of a segment of our cultural heritage. Local or regional heritage is considered in the establishment of special designation areas with the associated themes.	
Bill Robinson	I-173	CR25 (CR-C)	The NHPA mandates, in the BLM's own words from the RMP/EIS, "the consideration of avoidance or mitigation of adverse impacts on cultural resources or traditional cultural places that are either listed on or have been determined eligible for the NRHP." The BLM ignores this mandate and claims, "since the locations of every single eligible site within the planning area are not known, largely because of the dearth of investigative surveys that have been conducted, it is not possible to provide a comprehensive list or map of all such sites." If the BLM does not know the location of all the sites eligible for listing on the NRHP, how can those sites be afforded the same level of protection? The BLM must know the location of historic sites and the potential impacts before a fully informed decision can be made.	It is not necessary for the BLM to know the exact location and National Register eligibility status for every single cultural resource site in the Vernal Field Office in order to establish broad management decisions in the RMP. Rather, the BLM must ensure that consideration of impacts to NRHP-listed or NRHP-eligible resources is given when specific impacts are identified. To this end, the BLM requires that undertakings with the potential to impact cultural resources are assessed for potential adverse effects and include such steps as resource identification, resource evaluation, and resource avoidance or impact mitigation. That is, all undertakings are subject to review under Section 106 of the National Historic Preservation Act. Further, the BLM has identified several areas within the VPA where special designations such as ACECs would be established, in some cases in large part to protect cultural resource values. These special designations invoke management protocols that afford equal consideration to both known and as-yet-unidentified cultural resources.	
IPAMS	O-14	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	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	X

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			cultures that once occupied the vernal planning area.	positive impact of increasing the body of knowledge about past human behaviors and occupations in the Vernal Planning Area.”	
Westport Oil and Gas Company	O-28	CR27 (CR-E) (LCR-1)	On page 4-44, we concur with the statement that, “... although there is always potential for inadvertent discovery, historically, the ability to identify sites during the planning phase, and standard development stipulations that enable and promote site avoidance, has resulted in a relatively low rate of sites requiring mitigation and a very low rate of negative impacts to sites. According to the Vernal field office archaeologist, approximately 1% of the total cultural resource sites involved in oil and gas development has been negatively impacted by development.”	Comment noted.	
Westport Oil and Gas Company	O-28	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.”	
KerrMcGee Oil and Gas Onshore LLC	O-29	CR27 (CR-E) (LCR-1)	On page 4-44, we concur with the statement that, “... although there is always potential for inadvertent discovery, historically, the ability to identify sites during the planning phase, and standard development stipulations that enable and promote site avoidance, has resulted in a relatively low rate of sites requiring mitigation and a very low rate of negative impacts to sites. According to the Vernal field office archaeologist, approximately 1% of the total cultural resource sites involved in oil and gas development has been	Comment noted.	

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			negatively impacted by development.”		
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.”	X
Cripple Cowboy Cow Outfit	O-30	CR26 (CR-D)	Buying the Ute allotments absolutely would be the worst thing for any cultural resources.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	CR29 (R-CR13)	The standards for cultural resource protection will have major not minor impacts on livestock grazing.	Before any ground disturbing actions occur, a Class III (100%) inventory would be completed. If a significant site was located, project modification or some other management tool would be used to avoid the site or minimize damage to it. The report, site form and mitigation would be reviewed by the Utah Division of State History through the Section 106 process. Before a grazing permit is renewed, known sites would be checked to ascertain if grazing and related actions have negatively affected significant sites. If so, then actions would be taken to minimize or avoid further damage to these properties.	
Vermillion Ranch Limited Partnership	O-33	CR42 (R-CR1) (RCR2)	-The draft RMP assumes that BLM can manage large areas of land to protect cultural resources. See generally DEIS II-6-7, 81, IV-33-35. A closer look at the applicable statutes contradicts this assumption. The National Historic Preservation Act (“NHPA”), 16 U.S.C. §§470- 470b, and the rules, 36 C.F.R. Part 800,	The NHPA requires the BLM to assess the impact of federal undertakings on the characteristics of cultural resources that have resulted in their listing on or have rendered them eligible for listing on the National Register of Historic Places under one of the Register’s four criteria. As part of this	

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			<p>merely require BLM to analyze possible adverse impacts of a federal undertaking on any site listed under the NHPA. The law and rules protect the physical sites, not the views or experiences related to those sites. Even when an agency must assess the direct and indirect impacts to a site, the question is limited to the physical impacts, not experiential. This is equally true for the Archeological Resources Protection Act ("ARPA"), 16 U.S.C. §§470aa-470mm. Federal law protects the integrity of the site or the artifact from destruction or loss. Neither law authorizes BLM to withdraw or classify large areas of land as protective zones on the basis that other multiple uses may adversely affect the experience of visitors to the physical site. Cultural resource protection is not found in the definition of multiple uses and it is not one of the primary multiple uses identified by Congress for management of the public lands. 43 U.S.C. §§1702(c), 1702(l). FLPMA does not include protection of viewsheds or experiences related to these cultural or historic sites in the mandate for management of public lands.</p>	<p>assessment under the mandates of the NHPA, the BLM must consider seven elements of historical integrity for each resource. These elements of integrity include location, materials, design, workmanship, association, setting, and feeling. Additionally, under both the NHPA and other legislation, the BLM must consider the impact of its undertakings on those resources that are identified as culturally important and/or sacred to Native American Tribes and other cultural groups. The elements of these resources that render them important to such groups are most often related to the activities that occur at the site, the oral tradition related to the site, etc., which are experiential and sometimes only minimally related to the physical aspects of the site. Impacts that alter or diminish the ability the cultural practitioner to use that site in the traditional way, which includes having the traditional experience, are considered adverse impacts.</p> <p>A significant negative impact to site setting is considered an "Adverse Effect" in 36 CFR Part 800.9, (a), (b), (2).</p>	
Vermillion Ranch Limited Partnership	O-33	CR43 (R-CR2)	<p>-4.11.1 Impacts Common to All"</p> <p>There is little if any correlation between visual classes and protection of cultural resources. The RMP assumption of a direct and beneficial correlation is a fallacy repeated throughout the DEIS. See Kenczka letter [Brooks Letter, p. 3-4] regarding lack of legal authority to rely on NHPA to establish visual classes for cultural sites.</p>	<p>The establishment of visual classes for individual areas has been done independent of whether or not cultural resources are present in the area. The commenter erroneously assumes that the presence of such resources is the cause for any given designation. Rather, the independent designation of higher VRM classes has, as an incidental consequence, a beneficial impact upon those cultural resources that may be present by placing special management provisions on land uses that</p>	

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				result in ground disturbance; reduced ground disturbance related to the maintenance of visual values results in less opportunity for inadvertent impact to cultural resources.	
Vermillion Ranch Limited Partnership	O-33	CR44 (R-CR3)	The RMP needs to discuss how law and policy changed and support the cultural resources management proposed. For instance, rules now require local government to be consulted on undertakings if requested but the RMP makes no provision for such consultation.	An RMP need not include discussion of how each law related to each resource or land use issue has changed since the previous RMP was prepared. It is sufficient to describe, as is outlined in the purpose and need statement for the RMP (Chapter 1), that revisions to the existing RMP are necessary to comply with changes in federal law and policy governing public lands.	
Vermillion Ranch Limited Partnership	O-33	CR45 (R-CR4)	The laws and rules regarding cultural resource protection have not changed to support the expansive approach adopted in the RMP. The RMP uses cultural resource protection as grounds to expand visual resource management (“VRM”) classes. Neither federal law nor the rules authorize VRM to protect cultural resources outside of the actual physical site.	See comment response CR43.	
Vermillion Ranch Limited Partnership	O-33	CR46 (R-CR5)	“Conduct an inventory according to professional standards commensurate with the land use activity, environmental conditions, and the potential for cultural resources. Local, state, and tribal governments will be consulted when they indicate a desire to be consulted or involved.”	<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 opinions or preferences.</p> <p>The suggested change had little relevance to the</p>	

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				adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	CR46A (R-CR5)	BLM should recognize county's role under section 106 of the National Historic Preservation Act ("NHPA") in helping BLM determine eligibility for cultural resources and appropriate management. 36 C.F.R. §800.1(a).	<p>The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled.</p> <p>Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.</p> <p>43 U.S.C. §1712(c)(9) states that the Secretary of the Interior (through the land use plans of the federal agencies under it) shall "coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and</p>	

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				management programs of other Federal departments and agencies and of the States and local governments within which the lands are located." It further states that "the Secretary shall...assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands [and] assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans..." This language does not require the BLM to adhere to or adopt the plans of other agencies or jurisdictional entities, but rather to give consideration to these plans and make an effort to resolve inconsistencies to the extent practical.	
Vermillion Ranch Limited Partnership	O-33	CR47 (R-CR6)	-Alternative A, Alternative D The RMP assumes a direct correlation between VRM and cultural resources which does not exist. Many of the cultural resources are not visible and even if they are, the VRM classes far exceed what is appropriate applying BLM guidance, DM 8431, H-8410-1.	See comment response CR43.	
Vermillion Ranch Limited Partnership	O-33	CR48 (R-CR7)	Table 4.3.5 Estimated Acres and Potential Cultural Resource Sites Associated with Rangeland Constructions and Vegetation Treatment by Alternative Table 4.3.5 needs to be revised, since it appears that BLM is operating under an incorrect assumption of its cultural resources authority. See Letter to Jerry Kenczka [Brooks Letter].	See comment response CR42. BLM manages cultural resources under numerous laws and their implementing regulations. The agency's 8100 manuals, which outline how cultural resources are to be managed, provide agency managers with the guidelines necessary to consider cultural resources in a multiple use context. NEPA and CEQ guidelines provide further guidance for management. Table 4.3.5 in the PRMP/FEIS is based on these authorities.	
Vermillion Ranch	O-33	CR49 (R-CR8)	The RMP assumes that visual classifications will protect cultural resources, an assumption which	See comment response CR43.	

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Limited Partnership			contradicts other statements in the EIS that the effects on cultural resources are due to surface and subsurface disturbances. Most of the cultural resources are buried and VRM classes have little if any direct correlation. These discussions should be deleted.		
Vermillion Ranch Limited Partnership	O-33	CR50 (R-CR9)	4.3.2.10.1 Alternative A Class I VRM is limited to wilderness. In most cases, it does not appear that the acres classified as Class II meet the criteria. Instead, the RMP lumps land together without regard to DM 8431, H-8410-1. BLM cannot impose a VRM class to protect cultural resources. The VRM classes are intended to protect "vistas" when cultural resource protection is limited to the physical rather than the visual integrity of the site. Just as the National Park Service cannot extend a wild and scenic river boundary to protect the vista, BLM cannot impose VRM classes to protect views from the cultural resources site. Sokol v. Kennedy, 210 F.3d 876, 880 (8th Cir. 2000).	See comment response CR43.	
Vermillion Ranch Limited Partnership	O-33	CR51 (R-CR10)	4.3.2.10.4 Alternative D [No Action] Cultural resources are protected by statute and the protection applies to the physical site. 16 U.S.C. §§470, 470aa. No authority exists to extend that protection to the visual, auditory, or emotional experience.	See comment responses CR42 and CR43. Please refer also to 36CFR Part 9(a), (b), (2). Setting is considered by the CFR as a factor in site preservation and determination of adverse effects. It appears also that the commenter has incorrectly read the analysis in this section. The impacts discussed relate to protection of cultural resources associated with proposed VRM classes, not a protection of the visual resource itself.	
Vermillion Ranch Limited	O-33	CR52 (R-CR11)	4.3.2.11 Impacts of Wildlife and Fisheries Decisions of Cultural Resources The RMP incorrectly assumes that land use per se	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	X

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Partnership			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>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>	
Vermillion Ranch Limited Partnership	O-33	CR53 (R-CR12)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“The reduction or control of surface disturbing activities, such as oil and gas development and OHV travel, within large geographic areas to preserve crucial deer winter range affords significant protection to cultural resource sites and insures preservation of the important scientific, experimental, conservation, and traditional use values of these resources assuming they are present.”</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 opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p> <p>OHV travel has clear and well-documented surface</p>	

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				<p>disturbance associated with it. The BLM also declines to implement the suggested addition. The BLM is specifically mandated to manage cultural resources that have been determined eligible for the National Register of Historic Places or otherwise determined through consultation and consensus to be locally, regionally, nationally, or internationally important. Such resources, by definition, possess scientific, experimental, conservation, and/or traditional use values.</p>	
Vermillion Ranch Limited Partnership	O-33	CR53A (R-CR12)	<p>The RMP overstates the effects of oil and gas development and protection of cultural resources. It also shows that the draft RMP fails to conform to IM 2003-237, because the RMP fails to scientifically justify these restrictions and fails to explain how these are the least restrictive necessary. The RMP loses sight of the fact that elk, deer, and antelope are game species, whose populations are trending upward and have greatly increased over the last planning cycle.</p>	<p>Any management action that reduces or eliminates surface and subsurface disturbance has a direct correlation to the protection of cultural resources, for which the primary (though not only) threat of irreparable damage is physical disturbance. As surface disturbance is reduced, the probability of impacts to cultural resources is also reduced.</p> <p>IM 2003-237 applies to the fire program and the effects of fire management on cultural resources. Oil and gas development is not considered in this IM.</p>	
Vermillion Ranch Limited Partnership	O-33	CR54 (R-WH14)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“The reduction or control of surface disturbing activities, such as oil and gas development and OHV travel, with large geographic areas to preserve crucial deer winter range...insures preservation of the important scientific, experimental, conservation, and traditional use values of these resources assuming they are present.”</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 opinions</p>	

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				<p>or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	CR54A (R-WH14)	If OHV travel is surface disturbing, then so are wild horses and mountain bikes. OHV travel does not mix soil and if OHV travel is to be included within the definition, then so should wild horse herd management areas, where the horses trail and strip the area of vegetation.	<p>The analysis provided is offered on a broad landscape level. Impacts from wild horses would occur on a very localized level within Herd Management Areas (HMAs) and only within those portions of the HMAs where horses trail or congregate. Additionally, beyond confining horses to specific management areas, the BLM cannot manage animal behavior to the degree that it can manage human behavior by establishing designated travel routes in order to direct the behavior away from sensitive resources. As such, the impact of wild horses on cultural resources cannot be quantified.</p> <p>The impacts of recreation decisions on cultural resources are discussed in Section 4.3.2.6 in the PRMP/FEIS.</p>	
Enduring Resources	O-40	CR28 (JCR-1)	The DEIS proposes to "pro-actively reduce hazardous fuels or mitigate the potential hazard around archaeological and cultural sites that are susceptible to destruction by fire and from prescribed fire activities." We are concerned with how the BLM will pro-actively reduce hazardous fuels around arch sites and in what way this will affect oil and gas development.	Oil and gas development will not be affected by this provision. The "hazardous fuels" referred to in the statement are vegetation and woody materials such as invasive plants that provide a ready fuel source for wildland fire. Pro-active reduction of these fuels would consist of vegetation treatments to reduce fuel loading.	
National Trust for Historic Preservation	O-41	CR12	The draft RMP fails to incorporate BLM's responsibilities under the NHPA into the RMP process, and to ensure that irreplaceable historic and cultural resources are fully considered in planning for proposed management decisions and objectives. The draft focuses heavily on accommodating oil and gas	As part of its Section 110 responsibilities and in incorporating cultural resources into the planning process, the BLM has identified and proposed a number of ACECs within which cultural resource values are a key component. See Table 2.1.18 (Special Designations – Areas of Critical	

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			<p>development, giving little consideration to the protection of cultural resources beyond what would be required by Section 106 of the NHPA later in time. Without such considerations, BLM has not met their obligation as stewards of cultural resources.</p>	<p>Environmental Concern) and Section 3.14 of the PRMP/FEIS for more information on these designations. Further, the BLM would implement the overall management decision to designate specific OHV routes rather than leaving the entire VPA open to OHV travel as it is currently. See Table 2.1.4 (Cultural Resources) of the PRMP/FEIS, for specific details on these OHV designations. The designation of these routes is prompted in large part by the desire to protect cultural resources. Additionally, a program for interpretive facilities at specific sites within the VPA would also be implemented under all alternatives. See Table 2.1.4 (Cultural Resources), for specific details on these interpretive facilities.</p>	
National Trust for Historic Preservation	O-41	CR13	<p>The draft Vernal RMP/EIS is deficient in its analysis of environmental impacts with respect to designating areas available for oil and gas leases, energy development, and OHV designations, and the direct, indirect, and cumulative impacts that these activities will have on cultural and historic resources.</p>	<p>The analysis of direct, indirect, and cumulative impacts that the broad management decisions related to oil and gas leasing, energy development, and OHV designations could have under each alternative is contained in Section 4.3 of the PRMP/FEIS.</p>	
National Trust for Historic Preservation	O-41	CR14	<p>The RMP lacks analysis on how increased OHV designations and other forms of recreation will directly and indirectly impact cultural resources. The draft RMP makes no attempt to analyze the impacts to cultural resources outside of estimating the number of potentially impacted resources. Furthermore, there is no analysis regarding current impacts to cultural resources caused by OHV use.</p>	<p>Designation of specific OHV routes is expected to result in a reduction in overall impacts to cultural resources (and other resources) on a planning area-wide basis as compared to the current condition in which the entire planning area is open to OHV travel. The RMP is a programmatic document wherein broad management decisions, not project specific ones are made. As such, the preliminary identification of possible designated OHV routes is offered, but the specific feasibility and impacts of individual routes will be addressed in an OHV travel plan that will be prepared in conjunction with a NEPA document subsequent to the adoption of the final RMP.</p>	

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National Trust for Historic Preservation	O-41	CR31 (LCR-2)	BLM needs more comprehensive management strategies and is currently falling short of its responsibilities under Section 110. BLM needs more continuing stewardship over the properties.	It is required under federal law that project effects on the physical condition and setting of a site be analyzed through the NHPA Section 106 process and the NEPA process before project implementation. Activity plans will be written to comply with Section 110 after the approval of the RMP for Special Management areas. These plans will be reviewed by the BLM, Division of State History, Tribes and others before implementation to assure the plan meets regulatory and social needs and requirements.	
National Trust for Historic Preservation	O-41	CR32 (LCR-3)	The predictive model is flawed, it does not: capture the overall adverse effects on the integrity of context and setting on cultural resources and landscapes, address cumulative adverse effects of heavy development, and the BLM assumes that preservation can occur through the Section 106 process. Develop a new model that considers the areas already leased, lands to be leased, and known cultural resources to achieve a more holistic perspective. Consider cumulative impacts in the alternatives.	The predictive model used to analyze impacts on cultural resources was not designed to describe impacts to the larger cultural landscape, but rather to provide a means of assessing the relative potential impact of the range of alternatives. The potential cumulative impact of land use management decisions on the overall cultural resources record of the Vernal Planning Area is discussed in Section 4.3.2.13 in the PRMP/FEIS. Adding information on areas already leased, to be leased, and known sites would not enhance or refine the model to make it more accurate or holistic. Areas that have been leased have not necessarily been developed, and as extensive acreage within the Vernal Planning Area (VPA) would be open to at least some form of minerals and energy development, livestock grazing, etc., the addition of such information would not result in a significant change from the current model, which considers the entire VPA. Additionally, the model was tested against data regarding known site locations. Incorporating known sites locations into the model beyond this measure would likely skew the predictive capabilities of the model as the vast	

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				<p>majority of sites identified thus far within the VPA have been identified as a result of Section 106 undertakings in very specific portions of the VPA and, which does not represent a scientifically valid sampling strategy.</p> <p>In addition to implementing the Section 106 process to address known potential impacts on individual sites at the project level, the RMP provides for the proactive management of cultural resources through such actions as the designation of ACECs, which include cultural values, the nomination of worthy sites, districts, landscapes, and traditional cultural properties to the National Register, the public interpretation of appropriate cultural resources.</p> <p>NEPA also guides the process by which the effects of a project are measured, to evaluate the potential of projects to have negative effects on a resource. Predictive models are designed to measure many variables. Projects would condition the model used to predict some factor regarding the archaeology of the Area of Potential Effect (APE). Thus, a dynamic approach to land use planning must be utilized to ensure a proper balance of competing needs. The database is constantly evolving as more data are acquired through project inventories. These data are used in the NEPA process.</p>	
National Trust for Historic Preservation	O-41	CR33 (LCR-4)	The RMP should ensure Executive Order 13287 (Preserve America) is integrated to establish a proactive stewardship agenda.	The BLM has integrated the spirit of the Preserve America executive order and the mandates of Section 110 of the NHPA through such measures as the proposed adoption of ACECs that would, in large measure, be established to provide protection	

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				<p>to cultural values via special management provisions, through the proposed limiting of OHV travel to designated routes as a measure of decreasing impacts to cultural resources throughout the Vernal Planning Area. Other protection measures include the proposed adoption of Management Common to All goals that include nomination of sites, districts, landscapes, and traditional cultural properties to the National Register of Historic Places, reducing vegetation fuels loading around cultural sites to reduce the likelihood of impacts from wildfire, and identifying priority areas for inventories for cultural resources in the absence of a federal undertaking.</p>	
National Trust for Historic Preservation	O-41	CR34 (LCR-5)	<p>The RMP should provide an appropriate timeline for Section 106 compliance, and should not defer compliance until the APD is submitted by adding stipulations to a lease. An alternative to Section 106 is a phased process, which will defer the final identification and evaluation of adverse effects until the nature, scope, and effect of an undertaking is defined. An MOA or PA must be in place. However, not all impacts can be mitigated through Section 106 and should not be deferred for site-specific development. Because it is not only reasonably possible to analyze the environmental impacts of the proposed energy development on cultural resources at the present time, but also likely that such impacts will occur, BLM should be required to analyze those impacts in the EIS and provide such information to the public.</p>	<p>Standard BLM practice, which would continue under all alternatives in the RMP/EIS, calls for a three-pronged approach to meeting its Section 106 and other legislative responsibilities. First, the BLM uses existing cultural resources data to assist in the identification of broad management decisions in the RMP such as land use allocations, special designations, etc. The Utah State Historic Preservation Office (SHPO) Native American Tribes, and other interested parties are consulted as part of the RMP preparation process. Second, the BLM requires identification and evaluation of cultural resources at the time sufficient specific details of an undertaking are known to identify potential impacts to cultural resources in the area of potential effects. This may occur during or prior to the submittal of an APD. Third, the BLM consults with SHPO and other interested parties regarding the anticipated impacts of the undertaking in order to identify appropriate avoidance or mitigation measures, which may include but are not limited to lease stipulations.</p>	

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National Trust for Historic Preservation	O-41	CR35 (LCR-6)	We oppose BLM designating limited OHV travel areas without conducting Section 106 and mitigating effects. Provide details on new motorized trails and the potential for adverse effects. OHV activity could have major adverse impacts to resources in some areas. BLM should provide greater detail on the limited OHV routes through ACECs and remove those that would cause irreparable harm to resources.	Routes being designated through the RMP are existing routes where disturbance has already occurred. No new routes are being proposed for construction. Impact assessments for the routes will be carried out as part of the implementation plan that will be prepared subsequent to the RMP.	
National Trust for Historic Preservation	O-41	CR36 (LCR-7)	The RMP does not provide adequate baseline data, information and a description about current cultural and historic resource conditions, a requirement of NEPA. More inventory is needed to identify eligible sites and determine appropriate management	<p>Any recitation of individual sites known to be in the area would only be partial and would be outdated immediately upon issuance of the RMP. The current cultural resources condition changes on a daily basis as sites are identified and evaluated as a result of inventories and assessments. The BLM is required to describe the current condition at the time of the RMP using the best available data and presenting it in a manner that affords the public an opportunity to understand the nature of the cultural resource environment within the planning area. Section 3.3 of the PRMP/FEIS discusses the nature of the cultural record in the area, the relative density of cultural resources across the landscape as known from existing data, and the status of NRHP-listed sites.</p> <p>See also the comment response CR7 regarding inventory of cultural resource sites.</p> <p>The volume of the RMP precludes a lengthy discussion of the existing site database held by the BLM and other agencies. This limitation prevents highly detailed discussions. There are BLM staff and references which could address public</p>	

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				concerns about detail and content.	
National Trust for Historic Preservation	O-41	CR37 (LCR-8)	The analysis for direct and indirect impacts to cultural resources is inadequate. The RMP needs additional analysis of direct and indirect impacts in the present and future. Impacts should be considered for surface and buried deposits.	The BLM has deemed the analysis sufficient for the needs and requirements of a programmatic level RMP. Additional analysis will be conducted during project-level NEPA and Section 106 processes, when information about the nature and location of specific undertakings and their potential impacts are known. Review of these documents by other authorities also ensures that effects are adequately researched prior to decision-making.	
National Trust for Historic Preservation	O-41	CR38 (LCR-9)	BLM must analyze mitigation measures in detail and explain how effective the measures would be. The RMP does not provide information about mitigation measures in addressing adverse effects. These must be specifically discussed in the oil and gas section. The RMP process is a good time to alter 'conditions of approval'	Analyzing mitigation measures in detail and discussing the effectiveness of said measures as suggested presupposes the precise nature of the mitigation measure employed as well as the precise nature of the resource involved. The nature of the mitigation measure employed is tailored through the Section 106 and other consensus processes to the specific nature of the resource involved and is designed to be the most effective measure that is feasible and prudent relative to the nature of the impact. Further, mitigation measures can include a wide variety of actions, which are agreed upon through the consensus process. As such, the RMP cannot analyze all possible mitigation measures and their effectiveness.	
National Trust for Historic Preservation	O-41	CR39 (LCR-10)	Baseline data on the current cultural resources condition are needed to accurately balance multiple land use. This information is not sufficiently provided in the RMP. This lack of adequately establishing the baseline has caused the BLM to fail in balancing all multiple uses and giving equal consideration to non-renewable cultural and natural resources relative to minerals and energy development; cultural resources are under-represented in the consideration of	The BLM has considered cultural resources in establishing management decisions such as special designations, minerals and energy lease stipulations, and overall management goals and objectives that adhere to the mandates of federal law and BLM policy, as demonstrated throughout the RMP. Provisions have been made for nominating worthy sites, districts, landscapes, and traditional cultural properties to the National	

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			balancing land uses.	Register of Historic Places and for the avoidance of impacts to National Register-eligible sites by other land use activities. Baseline data for cultural resources are available to BLM managers in the VFO, provided by the appropriate staff. Conditions are monitored by professionals in the field and interested public. Site condition is also provided to the BLM through inventories conducted for projects and used in the NEPA process.	
National Trust for Historic Preservation	O-41	CR40 (LCR-11)	Many of the designated river systems have outstanding, irreplaceable cultural and historic resources along their banks, and we strongly recommend that the BLM designate all 39 river segments as eligible for the NWSRS.	Comment noted.	
National Trust for Historic Preservation	O-41	CR41 (LCR-12)	We suggest that BLM provide for adaptive management schemes that allow BLM to withdraw areas from approved destructive uses when they are identified as having cultural resources.	Standard BLM policy, regardless of the provisions of an RMP, allows for emergency closures and other adaptive management actions when unanticipated and unacceptable levels of impacts to resources are identified.	
Utah Petroleum Association	O-42	CR27 (CR-E) (LCR-1)	On page 4-44, we concur with the statement that, “.... although there is always potential for inadvertent discovery, historically, the ability to identify sites during the planning phase, and standard development stipulations that enable and promote site avoidance, has resulted in a relatively low rate of sites requiring mitigation and a very low rate of negative impacts to sites. According to the Vernal field office archaeologist, approximately 1% of the total cultural resource sites involved in oil and gas development has been negatively impacted by development.”	Comment noted.	
Utah	O-42	CR30	The DEIS states that no alternative benefits cultural	Section 4.3.2.13 in the PRMP/FEIS has added the	X

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Petroleum Association			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.	<p>following additional language:</p> <p>“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.”</p>	

Environmental Justice

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IPAMS	O-14	EJ1 (JEJ-1)	BLM fails to disclose how the restrictions to oil and gas development, from overlapping proposed management decisions may combine to increase the consumer cost of gas, which may be disproportionately borne by low-income populations.	Should increased consumer costs for oil and gas products result from management decisions included in the RMP, the costs would be borne equally by all consumers, and not just low-income populations. As such, no analysis of such impacts is warranted in terms of environmental justice.	
Utah Petroleum Association	O-42	EJ1 (JEJ-1)	BLM fails to disclose how the restrictions to oil and gas development, from overlapping proposed management decisions may combine to increase the consumer cost of gas, which may be disproportionately borne by low-income populations.	Should increased consumer costs for oil and gas products result from management decisions included in the RMP, the costs would be borne equally by all consumers, and not just low-income populations. As such, no analysis of such impacts is warranted in terms of environmental justice.	