

Special Status Species

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
State of Utah	G-1	SS23	<p>The RMP must recognize all state and local sage-grouse plans as well as the WAFWA guidelines (Connelly et al., 2000). The RMP should discuss the need to cooperate with UDWR in creating conservation agreements and strategies for other state-sensitive wildlife species.</p>	<p>In Table 2.1.21 (Special Status Species) in the PRMP/FEIS, Alternative C proposes to manage the sage grouse under Connelly's Guidelines. Alternative A proposes to manage the sage grouse under the Strategic Management Plan for Sage Grouse (State of Utah, June 2002).</p> <p>In Table 2.1.21 under the subsection entitled Management Actions Common to All Action Alternatives, it states:</p> <p>"BLM will work with UDWR and other partners to implement conservation actions identified in the State Wildlife Action Plan (Comprehensive Wildlife Conservation Strategy) (UDWR, 2005), which identified priority wildlife species and habitats, assessed threats to their survival, and identified long-term conservation action needs (per WO IM 2006-114)."</p>	
State of Utah	G-1	SS24	<p>Special status species alternatives begin on page 2-60. Alternative A represents the BLM's Best Management Practices (BMPs) that compare to USFWS guidelines for seasonal and spatial buffers, occupied nest protection, and unoccupied nest protection. The UDWR is concerned that not incorporating these guidelines may contribute to the decline of special status raptor species, including Ferruginous Hawks. A substantial portion of Ferruginous Hawk range in the Uintah Basin is already leased, therefore the three year unoccupied nest protection proposed under alternative B for existing leases may not be adequate to protect</p>	<p>Table 2.1.21 (Special Status Species) in the PRMP/FEIS provides a range of raptor guidelines for seasonal and spatial buffers, occupied nest protection, and unoccupied nest protection as described in the various alternatives.</p>	

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			<p>Ferruginous Hawk populations. The UDWR received a copy of a letter from the USFWS to the BLM dated October 15, 2003 expressing the same concerns regarding Ferruginous Hawk populations in the Uintah Basin. Any modifications to the spatial and seasonal buffers outlined in the BMPs should only be made after following the three criteria outlines in alternative A, and after consultation with the UDWR and the USFWS.</p>		
State of Utah	G-1	SS25	<p>Colorado River cutthroat trout (CRCT) reintroductions are discussed on page 2-61. The UDWR supports reintroduction of CRCT in several streams as outlined in the Conservation Agreement and Strategy for Colorado River Cutthroat Trout (<i>Oncorhynchus clarki pleuriticus</i>) in the State of Utah. Stream protection provided under the BLM's riparian guidelines should be implemented on CRCT streams. Future documentation (if any) of impacts to CRCT streams should trigger higher levels of silt management and grazing control.</p>	Comment noted.	
State of Utah	G-1	SS26	<p>The UDWR's Utah Sensitive Species List was revised in February 2005. The BLM should incorporate the new list into the RMP and adopt these species as BLM State Sensitive Species. The RMP should have flexibility in this adoption process, as the states sensitive species list will change periodically.</p>	IM UT-2007-078 updated the Utah BLM State Director's Sensitive Plant and Animal Species Lists as defined in the BLM 6840 Manual (Special Status Species Management).	
Duchesne County	G-9	SS1	<p>The Duchesne County General Plan contains the following policies regarding Introduced, Sensitive, Threatened and Endangered Species:</p> <p>a. No threatened and endangered species shall be proposed for listing in Duchesne County until verifiable scientific data has been available to the public that there is a need for the designation, that protections cannot be provided by other methods, and the area in question is truly unique compared to other area lands;</p>	Comment noted.	

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			<p>b. Buffer zones for the protection of threatened and endangered species or other special designations are not acceptable;</p> <p>c. The County does not believe that it is the intention of the Act to restore all original habitats once occupied by a specific species, but only the amount needed to protect the species from extinction;</p> <p>d. These designations or reintroduction often grow beyond the stated boundaries and scope and result in detrimental effects on the area economy, life style, culture and heritage. The Fish and Wildlife Service shall exclude areas from critical habitat designation if the economic damage is considered too great;</p> <p>e. Designation or reintroduction plans, guidelines, and protocols must not be developed or implemented without full County involvement and public disclosure;</p> <p>f. Any analysis of proposed designations or reintroductions must be inclusive and analyze needed actions associated with the proposal to prevent growth beyond the scope and boundaries;</p> <p>g. Recovery plans must provide for indicators to track the effectiveness of the plan and identify at the point recovery has been accomplished;</p> <p>h. Such designations shall provide access for reservoirs, maintenance of irrigation facilities, fire, weed and pest control;</p> <p>i. Devaluation of private property by the Endangered Species Act is a "taking" under the 5th Amendment of the U.S. Constitution and compensation must be paid.</p> <p>In light of these policies, Duchesne County supports an alternative that provides the least restrictions on the</p>		

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			use of natural resources in the planning area. This appears to be Alternative B.		
U.S. Fish and Wildlife Service	G-12	SS100 (JSS-58)	4th paragraph: Wildlife and Fisheries Management actions may have effects to special status species and their habitats. Habitat treatments beneficial for one species can be a detriment to another species. Generalizations like this are dangerous and inaccurate. For example, a vegetation treatment to improve habitat for sage grouse reduces habitat suitability for pygmy rabbits.	See Section 4.4 and Section 4.15.1 in the PRMP/FEIS for a discussion on fire management and effects to special status species.	
U.S. Fish and Wildlife Service	G-12	SS101 (JSS-59)	Species-specific analyses should be provided under each resource use to allow easy referencing. As currently written, it is difficult to determine if all effects for all species have been properly analyzed; for example, there is no discussion of sage grouse in the Fire and Woodland Management or Forage Allocation sections. In addition, the effects discussions are too generalized. Recommend using headings under each resource use, e.g., Mexican Spotted Owl, Bald Eagle, Canada Lynx, Listed Fish Species, etc. This will also provide a more comprehensive analysis and discussion of species-specific effects from resource use activities.	Section 4.15.1 in the PRMP/FEIS has been revised to clarify the impacts analysis.	X
U.S. Fish and Wildlife Service	G-12	SS102 (JSS-60)	This entire discussion appears focused on listed species. Analysis of effects to all special status species should be included in this section.	<p>Section 4.15.1 includes a general discussion of the impacts to all special status species based on impacts to habitat types used by these species. The links between these habitat types and the special status species are disclosed in Table 3.15.2 of the PRMP/FEIS.</p> <p>Section 4.15.1 the PRMP/FEIS has been revised to clarify this link and provide additional detail regarding potential impacts to non-listed special status species.</p>	X

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U.S. Fish and Wildlife Service	G-12	SS103 (JSS-61)	1st paragraph: We disagree with the statement that "...fire would not be used in black-footed ferret, bald eagle...habitats." Ferrets and eagles utilize sagebrush habitat that are often the target for fire management activities.	See comment response SS100.	
U.S. Fish and Wildlife Service	G-12	SS104 (JSS-62)	2nd paragraph: Rework this discussion. Mexican spotted owls occur in rocky canyon habitats in Utah. Therefore, the discussion of effects should include loss of prey species habitat in canyon bottoms and along canyon rims; human disturbance during fire activities; and smoke accumulation in canyons. Recovery Plan recommendations for forested habitats are not necessarily applicable to Utah's canyon habitats.	See comment response SS19.	
U.S. Fish and Wildlife Service	G-12	SS105 (JSS-63)	"...but none of the alternatives would exclude grazing in special status species habitats." While this may be true, the Plan should allow for site-specific exclusions where impacts to special status species are observed. For listed species, this acknowledgement would be consistent with sections 7(a)(1) and 7(a)(2) of the Endangered Species Act.	Regardless of the programmatic management provisions for livestock grazing contained in the RMP, the BLM retains the right and authority to make adjustments to authorized land uses within the parameters of federal law and policy.	
U.S. Fish and Wildlife Service	G-12	SS106 (JSS-64)	"Grazing would have both direct short and long term adverse impacts on listed plant species..." The Plan should provide appropriate measures to minimize grazing impacts to listed plant species.	As identified in Table 2.1.21 (Special Status Plants) and Table 2.1.23 (Vegetation Resources) of the PRMP/FEIS, protection of special status plant species is a primary goal/objective of the BLM across all alternatives and program decisions. Table 2.1.21 also indicates the goal to manage all listed T&E plant species and the habitats upon which they depend in such a manner as to conserve and recover these species to the point where the requirements of the Endangered Species Act are no longer necessary. The BLM's efforts would include collaboration with other agencies in developing and implementing recovery plans, habitat management plans, conservation agreements, etc. The BLM will	

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				be conducting inventories of listed plant species and will be monitoring them over time. Should undue impacts to specific areas be identified (regardless of the source of the impact), the BLM will exercise the appropriate management authority to adjust land use provisions within the parameters of federal law and policy in order to minimize, eliminate, and/or mitigate the impacts.	
U.S. Fish and Wildlife Service	G-12	SS107 (JSS-65)	We disagree with the statement that "Designation of SRMAs would provide beneficial impacts to special status species by removing some areas from oil and gas or mineral development." There will still be impacts to special status species from recreation use including habitat loss and fragmentation and human disturbances.	The impacts of recreation decisions on special status species acknowledged in the statement following the sentence in question. While it is true that some level of impact may occur to special status species from recreation use within designated SRMA, the statement in question is meant to describe the relative, landscape-level impact of SRMA decisions.	
U.S. Fish and Wildlife Service	G-12	SS108 (JSS-66)	This section focuses on recreation use at specially designated recreation areas. Impacts from recreation use would also occur on non-designated areas, and should be evaluated.	Recreation impacts are discussed in Section 4.10 in the PRMP/FEIS.	
U.S. Fish and Wildlife Service	G-12	SS109 (JSS-67)	Black-footed ferret: Include habitat loss and fragmentation as potential impacts.	Table 4.15.1 in the PRMP/FEIS has been revised to include habitat loss and fragmentation as potential impacts to black-footed ferrets.	X
U.S. Fish and Wildlife Service	G-12	SS110 (JSS-68)	Bald eagle: Habitat loss and fragmentation on deer winter ranges can also negatively impact bald eagles by reducing their forage resource of carrion.	Table 4.15.1 in the PRMP/FEIS has been revised to include habitat loss and fragmentation as potential impacts on deer winter range bald eagles.	X
U.S. Fish and Wildlife Service	G-12	SS111 (JSS-69)	Mexican spotted owl: Focus discussion of impacts on those occurring in canyon habitats, not forested habitats.	See comment response SS89.	
U.S. Fish and Wildlife Service	G-12	SS112 (JSS-70)	Bald eagle and yellow-billed cuckoo: Note that we recommend a 1.0 mile buffer for bald eagle nest sites and 0.5 mile buffer for bald eagle roost sites. The 100-	See comment response SS89.	

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Service			meter buffer from riparian areas does not provide adequate protection from surface disturbing activities.		
U.S. Fish and Wildlife Service	G-12	SS113 (JSS-71)	2nd paragraph: Note that the bald eagle is protected and managed under authority of the Endangered Species Act and section 7 consultation procedures. It may be inappropriate for the RMP to specify protection measures for listed species prior to completion of section 7 consultation. We do not believe a 2-year "protection" period is sufficient for bald eagle nest sites.	See comment response SS89.	
U.S. Fish and Wildlife Service	G-12	SS114 (JSS-72)	3rd paragraph: Provide a reference for the following statement "According to data supplied by the BLM, the USFWS believes that the ferruginous hawk population could be lost in the Uintah Basin..."	Section 4.15.2.6.1.1 in the PRMP/FEIS has been revised to include a reference for the statement cited in the comment.	X
U.S. Fish and Wildlife Service	G-12	SS115 (JSS-73)	1st paragraph: Delete "or less restrictive." The Guidelines already allow for flexibility and modification, based on biological and site-specific conditions.	See comment response SS19.	
U.S. Fish and Wildlife Service	G-12	SS116 (JSS-74)	2nd paragraph: Edit: "Strategic Management Plan for Sage-Grouse (State of Utah, June 11, 2002, or revisions)" throughout the document, because this is a long-range plan, we recommend allowing for revisions of conservation plans to be incorporated.	See comment response SS48 where it states that the BLM will work with the USFWS and others to ensure that plans and agreements are updated as necessary, thereby providing the BLM the flexibility to adopt revisions to plans as they occur.	
U.S. Fish and Wildlife Service	G-12	SS117 (JSS-75)	3rd paragraph: Note that the bald eagle is also managed under authority of the Endangered Species Act and Eagle Protection Act. It is also likely that nest sites will occur on BLM land during the implementation of this RMP revision. We recommend including management of bald eagle nest sites.	Section 4.15.3 of the PRMP/FEIS has been revised to provide a reference for the Endangered Species Act and Eagle Protection Act. Protections for eagle nests are outlined in Appendices H and K.	X
U.S. Fish and Wildlife Service	G-12	SS118 (JSS-76)	The cumulative effects analysis of the Special Status Species and Wildlife and Fisheries Sections of the document should address contaminant influxes to the river system, such as selenium and contaminants associated with oil and gas construction, drilling, and	Soil and water cumulative impacts are addressed in section 4.22.1. It should be noted that selenium is a natural occurring contamination and not just associated with energy related actions	

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			production operations.		
U.S. Fish and Wildlife Service	G-12	SS-57	4th paragraph: Lands and Realty decisions could affect special status species if large acreages of habitat are included in land exchanges or sales.	Section 4.15 in the PRMP/FEIS states: “Some decisions regarding resources would not affect special status species because they would neither change the status of current species threats nor affect recovery potential. The impacts from decisions concerning Cultural Resources, Lands and Realty, Paleontological Resources, Visual Resource Management, Wild Horse Management, and Wildlife and Fisheries Management would be negligible on special status plant and animal species in the Vernal Planning Area (VPA) and therefore will not be discussed further in this analysis.”	
U.S. Fish and Wildlife Service	G-12	SS73 (JSS-30)	Recovery Plans may be amended during the life of a Resource Management Plan (e.g. the Mexican Spotted Owl Recovery Plan is currently being revised). In addition, recovery plans may be developed for species for which none currently exist, or new species may be listed and recovery plans drafted for them. We recommend either not specifying a date, or noting that the BLM will incorporate new Recovery Plans as they are finalized.	In Table 2.1.21 under the subsection entitled Management Actions Common to All Action Alternatives, it states: “BLM will work with UDWR and other partners to implement conservation actions identified in the State Wildlife Action Plan (Comprehensive Wildlife Conservation Strategy) (UDWR, 2005), which identified priority wildlife species and habitats, assessed threats to their survival, and identified long-term conservation action needs (per WO IM 2006-114).”	
U.S. Fish and Wildlife Service	G-12	SS74 (JSS-31)	Habitat for listed or candidate species should be retained in federal ownership.	Table 2.1.7 (Land and Realty Management) in the PRMP/FEIS states in Management Common to All: “Habitat for listed T&E species would be retained in federal ownership. Exceptions may be considered	

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				in exchanges with the State of Utah and others with consultation and concurrence with the USFWS.	
U.S. Fish and Wildlife Service	G-12	SS75 (JSS-32)	Include a complete list of "threatened and endangered" and "sensitive" species that are included in references to "Special Status Species."	The listing of threatened and endangered and sensitive species is provided in Tables 3.15.1 and 3.15.2 in Section 3.15. BLM has adopted the Utah Sensitive Species List under authority of IM UT 2007-078.	
U.S. Fish and Wildlife Service	G-12	SS76 (JSS-33)	The difference between "Goals and Objectives" and "Action Common to All" is unclear. For example, it is unclear why augmenting ferrets in Snake John is in the "Goals and Objectives" section, but implementation of the Coyote Basin Cooperative Plan is mentioned in the "Actions Common to All" section. Provide a definition for "Goals and Objectives" and "Actions Common to All," and maintain consistency in their use throughout the document.	Goals and objectives represent the overarching condition the BLM wishes to achieve in management of the resources under its jurisdiction. The "Actions Common to All" represent specific measures that would be implemented under all action alternatives (A, B, and C) to help the BLM achieve that desired condition.	
U.S. Fish and Wildlife Service	G-12	SS77 (JSS-34)	Add the following goal/objective for Special Status Animal Species: "In cooperation with UDWR and USFWS, continue to implement the Cooperative Plan for the Reintroduction and Management of Black-Footed Ferrets in Coyote Basin, Uintah County, Utah."	See comment response SS3A.	
U.S. Fish and Wildlife Service	G-12	SS78 (JSS-35)	Paragraph 5: Direction contained in the Northwest National Fire Plan may not be entirely beneficial for special status species. The EIS should evaluate specific actions of the Fire Plan, and evaluate potential negative and beneficial effects.	Implementation of the plan is identified as a goal, not a management action common to all alternatives. As with all goals involving specific plans, implementation of the plan would be undertaken to the degree that the measures are consistent with all other directives, laws, regulations, policies, and management objectives of the RMP.	
U.S. Fish and Wildlife Service	G-12	SS79 (JSS-36)	The peregrine falcon is no longer a federally listed species, under the Endangered Species Act. Delete from the list provided in paragraph 6.	The commenter is correct. The peregrine falcon is a special status species, but is not Federally listed.	
U.S. Fish and Wildlife	G-12	SS80 (JSS-37)	We recommend adding the caveat to paragraph 6 that,	Table 2.1.21 (Special Status Species) of the PRMP/FEIS under the subsection entitled	

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Service			"Recovery Plan revisions or new Recovery Plans are also incorporated."	Management Common to All Action Alternatives states: "BLM would continue to implement the specific goals and objectives of all recovery plans, conservation plans and strategies, and activity level plans."	
U.S. Fish and Wildlife Service	G-12	SS81 (JSS-38)	Edit the 3rd paragraph, "In collaboration with the USFWS, DWR, and other partners, develop and implement habitat management plans or conservation strategies for sensitive species."	Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to make the suggested wording change.	X
U.S. Fish and Wildlife Service	G-12	SS82 (JSS-39)	Add Mexican spotted owl to this list. Include the following commitments: 1) Establish Protected Activity Centers (PACs) at all known Mexican spotted owl nest sites, 2) Maintain habitat to support small mammal populations as a prey base for Mexican spotted owls in occupied and suitable owl habitats, and 3) Retain large down logs, large trees, and snags as prey habitats in occupied and suitable Mexican spotted owl habitats.	Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to include the Mexican Spotted Owl.	X
U.S. Fish and Wildlife Service	G-12	SS83 (JSS-40)	Edit the Bald Eagle discussion to read: "Protect and restore cottonwood bottoms for bald eagle winter habitat... as well any new roost and nest sites...."	Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to make the suggested wording change.	X
U.S. Fish and Wildlife Service	G-12	SS84 (JSS-41)	Include a section for sage-grouse.	A range of differing management actions by alternative is presented in Table 2.1.21 (Special Statues Species).	
U.S. Fish and Wildlife Service	G-12	SS85 (JSS-42)	The UDWR is currently the lead in developing a multi-state Conservation Agreement for the roundtail chub, flannelmouth sucker, and bluehead sucker. As this should be final during the lifetime of this RMP, we	Section 2.4.1.4.4.3 in the Final EIS has been revised to add the Conservation Agreement for the roundtail chub, flannelmouth sucker, and bluehead	X

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			recommend you manage them as Conservation Agreement Species.	sucker.	
U.S. Fish and Wildlife Service	G-12	SS86 (JSS-43)	Reference is made to conservation measures identified in the Conservation Agreement and Strategy for Colorado River Cutthroat Trout. Similar action items should be identified from the Upper Colorado River Endangered Fish Recovery Program's Recovery Action Plan (available at www.r6.fws.gov/crrip/rip.htm)	The Recovery Implementation Plan for the Endangered Fish Species in the Upper Colorado River Basin (1987) is incorporated by reference in Section 1.9 of the PRMP/FEIS.	
U.S. Fish and Wildlife Service	G-12	SS87 (JSS-44)	Raptors: We commend BLM Vernal for incorporation of the most recent BLM BMPs and FWS Raptor Guideless in the Preferred Alternative A. Note that the identification of modifications to buffers is already anticipated by the FWS Raptor Guidelines.	See comment response SS19 and SS73.	
U.S. Fish and Wildlife Service	G-12	SS88 (JSS-45)	FWS, Raptors, Nest Protection, Alternative C: This alternative should apply the 7-year nest protection for existing oil and gas leases.	See comment response SS19.	
U.S. Fish and Wildlife Service	G-12	SS89 (JSS-46)	Raptors, Nest Protection, Existing Oil and Gas Leases: Note that the bald eagle is protected and managed under authority of the Endangered Species Act and Section 7 consultation procedures. It may be inappropriate for the RMP to specify protection measures for listed species prior to completion of Section 7 consultation. We do not believe a 2-year "protection" is sufficient for bald eagle nest sites.	The bald eagle has been delisted under ESA. The BLM will follow IM UT 2006-096, BMPs for Raptors and Their Associated Habitats in Utah, for nesting guidelines. The BMPs can be found in Appendix A of the PRMP/FEIS.	
U.S. Fish and Wildlife Service	G-12	SS90 (JSS-47)	Special Status Species: We recommend that human disturbances be avoided within a 2 miles of a lek during the breeding season (Alternative C), to provide protection for nesting. We also recommend allowing use of both the Strategic Management Plan for Sage-Grouse and the Connelly Guidelines, based on site-specific information and biologist evaluations. Also include other appropriate scientific information, as appropriate.	Comment noted.	

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U.S. Fish and Wildlife Service	G-12	SS91 (JSS-48)	There are 12 listed and 4 candidate species within the VPA, not 15 and 1. See also page 4-231.	These changes have been made in Table 3.15.1 of the PRMP/FEIS.	X
U.S. Fish and Wildlife Service	G-12	SS92 (JSS-49)	The DEIS states that 188,500 acres of split-estate lands (federal minerals-Tribal surface) within the Hill Creek Extension of the Uintah and Ouray Indian Reservation would be available for mineral leasing. Much of the impact analysis includes the acreage in the Hill Creek Extension; therefore, you should address impacts to species contained therein.	Potential impacts to special status species in the Hill Creek Extension were included in the impacts analysis contained in Section 4.15.	
U.S. Fish and Wildlife Service	G-12	SS93 (JSS-50)	This table should identify the potential occurrence of the southwestern willow flycatcher. Include a discussion that willow flycatchers have been identified along the White River near Ouray. Genetic testing to determine specific identity has not been completed. Many of the BLM RMP riparian conservation measures would also apply to willow flycatcher habitat.	The Southwestern willow flycatcher (SWFL) has never been documented in the VPA and has not been included in the PRMP for analysis. All known occurrences of SWFL lay south I-70. Consequently, there was not need to correct the Table 3.15.1.	
U.S. Fish and Wildlife Service	G-12	SS94 (JSS-51)	Identify the occurrence of 7 bald eagle nest sites in Utah. Closest known nests to the project area are northwest of Manila, and on the Duchesne River between Duchesne and Bridgeland. There is the potential for bald eagle nest sites to occur on BLM lands in the Vernal Field Office area.	Table 3.15.1 in the PRMP/FEIS has been revised to include information regarding the presence of these nests and the potential occurrence of nests in the Vernal Field Office planning area.	X
U.S. Fish and Wildlife Service	G-12	SS95 (JSS-52)	Mexican spotted owl: Delete the following statement: "They typically prefer old growth mixed conifer ponderosa pine, or evergreen oak forest, and associated deciduous riparian forests." While this is true in parts of their range, owls in Utah are restricted to rocky canyon habitats. Forested habitats should be referenced as suitable habitat for foraging and dispersal.	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	

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				<p>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>	
U.S. Fish and Wildlife Service	G-12	SS96 (JSS-53)	Penstemon scarious var. albifuvis is not known from Duchesne County.	The USF&WS identified a small area of habitat within Duchesne County in a Federal Register Notice.	
U.S. Fish and Wildlife Service	G-12	SS97 (JSS-54)	As previously noted (comment on page 2.4.13,4.4.3), we recommend you manage roundtail chub, flannelmouth sucker, and bluehead sucker as Conservation Agreement species, like the Colorado River cutthroat trout.	See comment response SS85.	
U.S. Fish and Wildlife Service	G-12	SS98 (JSS-55)	We recommend that BLM add Cryptantha barnebyi to its list of additional special status plant species. This species was a category 2 species in the FWS Federal Register NOR prior to 1996 and remains a species of conservation concern to the FWS Utah Field Office. We will review this species for possible inclusion as a candidate species at some time in the future as resources permit. Cryptantha barnebyi occurs in the same habitat as Penstemon grahamii, and has a narrower distribution and faces the same threats as P. grahamii.	<p>The BLM will manage special status plant species as identified by USFWS and the BLM Utah State Office.</p> <p>The BLM regularly updates its Sensitive Plant Species list. Cryptantha barnebyi will be considered for inclusion on the list at the next update.</p>	
U.S. Fish and Wildlife Service	G-12	SS99 (JSS-56)	Provide a list of the 17 listed and 28 sensitive species.	Section 4.15 in the PRMP/EIS has been revised to reflect the Utah Sensitive Species List under authority of IM UT 2007-078.	X
Bureau of Reclamation	G-18	SS155	This section states that the BLM will work with the USFWS 'and others' to ensure that plans and agreements for special status species are updated as necessary. We suggest adding "including the Upper Colorado Endangered Fish Recovery Program" after "others".	<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>	

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				<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>	
UBAOG	G-22	SS10	<p>The failure to clearly state the limitations on a specific activity prevents required analysis and disclosure. Baseless restriction, such as here, prevent analysis to insure management prescriptions are the least restrictive necessary. Rewrite to be consistent with law and Uintah County's Public Lands Implementation Plan based on species needs.</p>	<p>The RMP is a programmatic document intended to give broad direction for management. Site-specific NEPA will be conducted at a later time for proposed activities and will include more detailed analysis.</p> <p>Also see comment response PR3.</p>	
UBAOG	G-22	SS11	<p>Strike exception section. The exception here is not related to the prescriptions above it. It implies livestock would be managed to achieve rangeland health standards and implies that somehow grazing will be managed to improve grouse habitat. Livestock grazing is a permitted right and a mandated legal use of a resource. There is no authority to manage livestock grazing or otherwise change it to satisfy the needs of grouse.</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>	

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				Exception applies to all species including the sage grouse. BLM is mandated to follow the Fundamentals of Rangeland Health.	
UBAOG	G-22	SS12	As written, as an example, a single rider or stockman could not ride a horse across these areas. It would prevent Raptor viewing and hiking. In short, it would prohibit insignificant casual use.	It is not BLM's intent to prevent casual use. However, if it is determined that the proposed activity would have an impact on special status species, then the BLM would work with the user to minimize impacts.	
UBAOG	G-22	SS14	Here and in Appendix M, add a provision that any structures constructed within 1300 feet of a lek must be protected from raptor perching.	This provision is proposed in Alternative B and may be considered for the preferred alternative.	
UBAOG	G-22	SS15	Any designation within 2 miles of a lek must be designed to minimize to the extent possible raptor perching. Which stipulations do you comply with? Perches or avoiding perches?	The stipulation is meant to prevent or minimize raptor perching.	
UBAOG	G-22	SS16	The exception in Alternative B should be applied in all alternatives.	Comment noted.	
UBAOG	G-22	SS17	This would allow you to drill but you could not put in a tank battery.	Comment noted.	
UBAOG	G-22	SS18	Uintah County's Plan for Raptor Management was created with public input.	Comment noted.	
UBAOG	G-22	SS19	Unoccupied nests are not protected, however it is provided for here.	The Utah BLM has adopted the BMPs for Raptors and Their Associated Habitats in Utah, IM UT 2006-096. These BMPs may be found in Appendix A of the PRMP/FEIS.	
UBAOG	G-22	SS2	Strike "and restore them to their historic ranges."	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.	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<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>	
UBAOG	G-22	SS20	Most of the stipulations listed here are not consistent with Uintah County's Public Lands Policy and Plan. "B" is the only acceptable alternative.	See comment response PR3.	
UBAOG	G-22	SS2A	The criteria should not be restoration to historic range. First, little if anything is known about historic ranges. Second, what is often written is based on conjecture without data. It is neither feasible nor practical to restore these species to their historic range.	<p>One reason contributing to the listing of species is loss of habitat, including historic range. It is within the parameters of the Endangered Species Act (ESA) to have a goal of restoring historic range. One of the purposes of the ESA is to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved.</p> <p>The Endangered Species act defines the term 'conserve' as:</p> <p>"To use all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to the Act are no longer necessary. Such methods and procedures include, but are not limited to, all activities associated with scientific resources management such as research, census, law enforcement, habitat</p>	

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				acquisition and maintenance, propagation, live trapping, and transplantation, and, in the extraordinary case where population pressures within a given ecosystem cannot be otherwise relieved, may include regulated taking.”	
UBAOG	G-22	SS3	Strike this paragraph and rewrite as "BLM would manage the Black-footed Ferret consistent with the Cooperative Plan for the Reintroduction & Management of Black-footed Ferret in Coyote Basin Uintah County, Utah and with the 1999 Black-footed Ferret Reintroduction Plan amendment."	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 or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
UBAOG	G-22	SS3A	The cooperative plan for reintroduction and management is the basis on which the black-footed ferret was reintroduced as agreed on by County government and the Ute Tribe. No designations or other actions should be taken that are contradictory to this agreement as it could jeopardize future reintroduction efforts. In addition Uintah County's Public Land Policy provides that this is the guiding plan for Ferret management.	See Table 2.1.21 (Special Status Species) of the PRMP/FEIS. BLM would manage the black-footed ferret consistent with the 1999 Black-footed Ferret Reintroduction Plan Amendment and those portions of the Cooperative Plan for the Reintroduction and Management of Black-footed Ferret in Coyote Basin, Uintah County, Utah that are consistent with this plan amendment.	

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UBAOG	G-22	SS3B	Any black-footed ferret introduced in Daggett County should be classified as experimental nonessential. Daggett County should be added to the experimental nonessential designation status for the ferret.	The RMP does not consider black-footed reintroduction in Daggett County.	
UBAOG	G-22	SS4	Both the best management practices and the USFWS guidelines were developed without opportunity for public input or review.	When the draft was released, the public had the opportunity to comment during the 90-day public comment period. In addition, the Utah BLM has adopted the BMPs for Raptors and Their Associated Habitats in Utah, IM UT 2006-096. Detailed guidelines for implementing waivers to stipulations are found in Appendix A of the PRMP/FEIS.	
UBAOG	G-22	SS5	The best management practices and USFWS's guidelines do not provide appropriate consideration of the life cycles of the species and their respective adaptability to disturbance.	<p>Site specific NEPA will be conducted at the time the modifications are proposed.</p> <p>Considerations of the life cycles of the species and their adaptability are provided for under the exceptions, modifications, and waiver stipulations. Modifications to the spatial and seasonal buffers could be allowed as long as protection of nests is ensured by:</p> <ul style="list-style-type: none"> • completion of a Site-Specific Assessment form; written documentation by the BLM Field Office Biologist confirming that implementation of the modifications would not impact the success of the nest or the suitability of the site for future nesting; and • monitoring, which would include strategy employment and implementation of a post-project/mitigation plan. 	
UBAOG	G-22	SS6	The provision for protection of nest is not consistent	The commenter does not indicate which law or	

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			with law or regulation. (See General Comments on raptor management or the Uintah County's Public Lands Implementation Plan)	regulation this management prescription is not consistent.	
UBAOG	G-22	SS7	Alternative A defies required analysis and disclosure of impacts. As written, Alternative A is not consistent with Uintah County's Public Lands Implementation Plan. Alternative B is the only acceptable alternative presented.	See comment response PR3.	
UBAOG	G-22	SS8	To correct the many short comings of this section a new BMP should be written that recognizes the differences between species and is consistent with law.	The commenter does not specify the shortcomings so we cannot address this comment.	
UBAOG	G-22	SS9	The alternatives here are not consistent with law and Uintah County's Public Lands Implementation Plan.	See comment response PR3.	
Ute Tribe of the Uintah and Ouray Reservation	G-26	SS21	The Ute Tribe supports the use of Best Management Practices, timing limitations, controlled surface use, and no surface occupancy stipulations to protect special status plants and animals. In addition, the Tribe requests that the BLM consult with the Ute Tribe Natural Resources Department prior to implementing any actions that may affect special status species and/or habitats on the Uintah and Ouray Reservation.	BLM supports consultation with other jurisdictional agencies as stated in Section 1.4.1.2.	
Ute Tribe of the Uintah and Ouray Reservation	G-26	SS22	The Ute Tribe proposes the inclusion of the following stipulation for special status species and habitats in the RMP/EIS: No surface occupancy stipulations would be required for raptor and eagle nesting sites and special status plant species habitat (including threatened, endangered, proposed, and candidate species).	BLM has incorporated surface use restrictions for the management of wildlife. Please see Appendix K.	
Ute Tribe of the Uintah and Ouray Reservation	G-29	SS154	No leasing should occur within the agency-established distance of active sage grouse leks.	Comment noted.	

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Laird Fetzer Hamblin	I-171	SS156 (WF116) (JWF-6)	EIS states that in the VPA there are 15 species of plants and animals federally listed as T&E and 1 candidate species. EIS states that there are 28 species considered by Utah to as sensitive to becoming endangered. Both of these lists are incomplete for the federal and state species documented to or expected to exist in the VPA.	The commenter does not provide any information to substantiate the assertion that the species listing was incomplete. At the time of EIS publication, the listing of federal and state special status species was complete, based on information obtained from the USFWS and Utah DWR. See comment response SS75.	
The Nature Conservancy Moab Project Office	O-6	SS133 (LSS-15)	Include the following species in the Special Status Species list unless you have other information that would exclude them: Southwestern Willow Flycatcher, Barneby Pepper Grass, Big-tailed Bat, Fringed Myotis, Kit Fox, Spotted Bat, Short-eared Owl, Cornsnake, Western Toad, Eureka Mountainsnail, Palmer's Cleomella, Goodrich's Blazingstar, Wolverine, Boreal Owl, Petiolate Wormwood, Peculiar Moonwort, Clustered Lady's-slipper, and Alpine Poppy. (See original comment letter for reasoning behind this list, including the presence of these species on State and USFS lists.)	See comment response SS75.	
The Nature Conservancy Moab Project Office	O-6	SS134 (LSS-16)	BLM should assess impacts to species on UDWR's list of 'in conservation need' but not special status—should at least be considered at the project level.	It is not feasible to specifically assess impacts to all wildlife and plant species at this programmatic planning level due to the sheer number of species descriptions that would be required, Accordingly, the Draft EIS assesses impacts to key management indicator species that are representative of the typical species that occupy the existing habitat in the planning area. Additionally, impacts to threatened, endangered, and sensitive species are also analyzed, including impacts to BLM-sensitive species. BLM's mandated policy is to ensure that planning-level management decisions do not result in non-listed species becoming federally-listed (BLM Manual 6840). The impacts of individual projects	

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				will be analyzed at the site-specific level when those projects are proposed. If applicable, this analysis will also include the potential impacts to listed "in conservation need" species.	
The Nature Conservancy Moab Project Office	O-6	SS135 (LSS-17)	The RMP must establish the broad umbrella of stipulations under which project level NEPA is done and must prioritize maintenance of special status species over activities that adversely affect them.	The BLM must manage lands under its jurisdiction under the federal mandate of multiple use and sustained yield, and must do so in compliance with other federal legislation such as the Endangered Species Act. The RMP does establish the programmatic/landscape level framework for resource programs within the planning area.	
The Nature Conservancy Moab Project Office	O-6	SS136 (LSS-18)	The RMP contains language that appears to provide the necessary commitment to the protection of special status species; however, these commitments are stated as goals (which appears to mean guidance) rather than binding policy. This is relevant because several decisions in the RMP, such as oil and gas lease stipulations within several alternatives, appear clearly to violate stated goals and protective actions and to override many of the protective actions that are supposedly common to all alternatives. The DRMP does not clearly state how it resolves cases where goals/actions for different resources or program areas are in direct opposition. What happens when different goals conflict with each other?	<p>The commenter does not specifically identify how decisions in the RMP appear to violate the stated goals and objectives. As such, the BLM is unable to address this portion of the comment.</p> <p>The goals and actions of the RMP were developed to be compatible with each other across resource programs. Actions such as lease stipulations, restriction of OHV travel to designated routes and areas, establishment of ACECs, SRMAs, and WSRs, etc. are all intended to meet the overall goals of each resource program.</p>	
The Nature Conservancy Moab Project Office	O-6	SS137 (LSS-19)	The listed Book Cliffs soil-endemic plants have no protective stipulations, although surface-disturbing activities were among the main reasons for their listing to begin with. Surface-disturbing activities other than oil and gas are not discussed in Appendix K for these plants.	The stipulations in Appendix K apply to all surface-disturbing activities, not just oil and gas development. Protections for Book Cliffs soil-endemic plants would be established through lease stipulations and project-level conditions of approval in cases where such plants are identified through NEPA analysis conducted subsequent to the RMP.	
The Nature Conservancy	O-6	SS138	All lands with special status species should be federally retained, as well as high-priority habitats like riparian	Table 2.1.21 (Special Status Species) of the PRMP/FEIS establishes the position of the BLM in	

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Moab Project Office		(LSS-20)	areas.	retaining lands known to contain special status species.	
The Nature Conservancy Moab Project Office	O-6	SS139 (LSS-21)	The FRMP should enact adequate protective stipulations within the clustered occurrence areas of special status species that represent a minority of the land area of the VPA. None of the alternatives may be acceptable in their present forms for consideration as the Minerals and Energy Management section of the FRMP.	The BLM is at liberty to select any or all components of any given alternative for the Final RMP. Timing and controlled surface use, no surface occupancy, and no leasing stipulations apply to anywhere from 42% of lands open to oil, gas, and coal bed methane leasing under Alternatives B and D to 55% of lands under Alternative C (Alternative A = 49%). Within these broad leasing stipulations, more specific stipulations exist for all surface-disturbing activities. Additionally, conditions of approval would implement site-specific restrictions, minimization, and mitigation measures at the project level.	
The Nature Conservancy Moab Project Office	O-6	SS140 (LSS-22)	Mitigation measures are inadequate and need to be strengthened. Increased protection will reduce the need for monitoring.	Ongoing monitoring is a requirement under BLM policy. Additional mitigation measures will be developed at the project level, when such measures can be more appropriately tailored to the specific needs of the resources in question and the specific impacts of the proposed land use.	
Questar	O-12	SS119 (LSS-1)	This section trivializes the impacts of special species resource decisions on the oil and gas industry.	Comment noted.	
Questar	O-12	SS120 (LSS-2)	Alternative A in Appendix K states that no exemptions or waivers will be allowed but the section on raptor nests claims there may be. Same contradiction in sage grouse section	Appendix K and Sections 4.8.2.5.1.1 and 4.8.2.5.1.2 in the PRMP/FEIS have been revised to correct inconsistencies described in the comment.	X
Questar	O-12	SS121 (LSS-3)	Explain how it was determined that 2% more area surrounding hawk nest sites will be open to development.	See comment responses M194 and SS40.	

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Questar	O-12	SS122 (LSS-4)	Provide data to support statements about loss of raptor habitat due to development. Existing artificial raptor perches in oil fields have been successful.	See comment response SS40.	
Newfield Exploration Co.	O-13	SS27 (SS-A)	The BLM should limit the scope of the sage grouse stipulations to ACTIVE leks and define active vs. inactive leks. Newfields leases contain a lek that is surrounded by development and has been inactive for several years. Do you intend these stipulations to apply to maintenance and operations of existing facilities near an inactive lek? Within 0.5 mile of active leks, do you intend to require operations to retrofit existing equipment with best available technology to reduce noise.	These stipulations do not apply to maintenance and work-over operations. Information clarifying the scope of the sage grouse stipulations in terms of lek activity has been included in the FEIS.	X
IPAMS	O-14	SS119 (LSS-1)	This section trivializes the impacts of special species resource decisions on the oil and gas industry.	Comment noted.	
IPAMS	O-14	SS120 (LSS-2)	Alternative A in Appendix K states that no exemptions or waivers will be allowed but the section on raptor nests claims there may be. Same contradiction in sage grouse section	Appendix K and Sections 4.8.2.5.1.1 and 4.8.2.5.1.2 in the PRMP/FEIS have been revised to correct inconsistencies described in the comment.	X
IPAMS	O-14	SS121 (LSS-3)	Explain how it was determined that 2% more area surrounding hawk nest sites will be open to development.	See comment responses M194 and SS40.	
IPAMS	O-14	SS122 (LSS-4)	Provide data to support statements about loss of raptor habitat due to development. Existing artificial raptor perches in oil fields have been successful.	See comment response SS40.	
IPAMS	O-14	SS123	"Planning area wide" expanded deer and elk timing	Comment noted.	

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		(LSS-5)	restrictions in Alternative A are unacceptable and must be revised.		
IPAMS	O-14	SS124 (LSS-6)	Two government reports dispute the claim that oil and gas development was a major factor in listing Book Cliffs plant species as endangered: A 2002 BLM report states that illegal collection of the Uinta Basin hookless cactus is the primary threat to this species conservation and recovery on BLM lands; and a 1979 USFWS report arrives at a similar conclusion. As such, this entire discussion about the impact of oil and gas development should be deleted. (See original comment letter for full report references.)	See comment response SS35.	
IPAMS	O-14	SS125 (LSS-7)	Modify the impacts analysis to provide site-specific development data and commitments	The RMP is a programmatic (landscape level) document. Site-specific development data and commitments will be provided at the project-level NEPA stage and as part of conditions of approval for land use permits.	
IPAMS	O-14	SS126 (LSS-8)	Stipulations for raptor time restrictions need to be based on hard current data on a site-specific basis to determine the most appropriate level of protection	See comment response SS19.	
IPAMS	O-14	SS127 (LSS-9)	The table shows acreage differences between Alternatives A and D, which could not be calculated from the data provided.	Comment noted.	
IPAMS	O-14	SS128 (LSS-10)	Text is inconsistent in amount of acreage available to oil and gas than stated in Table S.1 and Table 4.8.1	Tables S.1 and Table 4.8.1 in the PRMP/FEIS have been revised to correct inconsistencies described in the comment.	X
IPAMS	O-14	SS129 (LSS-11)	No studies were cited to document how different raptor species are affected by disturbances.	See comment response SS19.	
IPAMS	O-14	SS130 (LSS-12)	The BLM needs to develop exceptions that would allow surface disturbance in the vicinity of a nest when protected by impacts or once the young have fledged.	Please, see Appendix K for exceptions related to seasonal and spatial buffers for raptor nests.	

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IPAMS	O-14	SS131 (LSS-13)	If the 7-year monitoring period for unoccupied nests is part of the USFWS guidelines then include them in the appendix, if not, the requirement should be deleted. Nests in poor or fair condition should have different stipulations than those in good condition. Develop species-specific guidelines based on nest re-use patterns. Buffers around every nest make oil and gas development difficult	See comment response SS19.	
IPAMS	O-14	SS132 (LSS-14)	Stipulations in Table 19 are inconsistent with Table 4.8.6 and Appendix H for ferruginous hawk timing restrictions	See comment response ME211.	
Westport Oil and Gas Company	O-28	SS28 (SS-B)	Section 4.2.8.5 purportedly discloses the effects of special status species resource decisions on mineral resources. However, the impacts to oil and gas development from special resource stipulations are greatly trivialized in the draft RMP	The comment is on the analysis associated with effects of Special Status Species upon Mineral Resources. For those species which are T&E listed, BLM has to mitigate those impacts regardless of the outcome. Impacts to oil and gas development are discussed in Section 4.8.2.5.	
Westport Oil and Gas Company	O-28	SS29 (SS-C)	This sections states that “it would be very rare for any one lease to have so many limitations as to render it inaccessible for energy development.” Clearly this statement is erroneous since the ½-mile restrictions around all raptor nests, in combination with big game crucial winter range restrictions, would render some oil and gas leases inaccessible to development. For example, seasonal restrictions for various species of raptors extend from January to August. Critical deer and elk winter range restrictions extend from November to the end of April. Based on these restrictions, there would be only 2 ½ months where oil and gas development would be allowed.	There are exceptions, waivers, and modifications to both of these stipulations, which allow for development under particular circumstances.	
Westport Oil and Gas Company	O-28	SS30 (SS-D)	This section states that “overall, it is estimated that a small number of operators may experience adverse economic effects if drilling operations must be stayed during special status species protection periods or if	Comment noted.	

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			<p>drilling operations must be moved to another area on the lease.” Moving to another area on the lease may not be technically and/or economically feasible. A specific area is chosen for development by the operators because it is the best location for oil or gas development. The same potential is not likely to be present at another location. In addition, 43 CFR 3101.1-2 states that a proposed well location can be moved up to 200 meters (0.12 mile) and the timing of the actual drilling can be delayed no more than 60 days to mitigate environmental concerns. Reference to this regulation appears in Appendix A of the draft RMP/EIS.</p> <p>In addition, the availability of drilling rigs is very limited. An operator might not be able to drill at all in a given year due to timing and spatial stipulations and a, lack of availability of drilling rigs during the limited period when the drilling stipulations do not restrict all construction and drilling activities. Therefore, we strongly object to the minimization of the potential effects to the oil and gas industry of the excessive stipulations in the draft RMP/EIS.</p>		
Westport Oil and Gas Company	O-28	SS31 (SS-E)	<p>This section states that “modifications, exemptions, or waivers may, in some cases, allow mineral development to occur. This would increase the potential number of wells drilled or other mineral development, increase the domestic supply of oil and natural gas or other mineral, and increase royalties to the federal government...”</p> <p>It would be very difficult for the operators to conduct cost-effective operations with the uncertainty of whether waivers, exemptions, or modifications would be granted by the BLM. In addition, this statement in</p>	<p>At the time of the on-site, operator requests for exceptions will be reviewed and recommendations will be discussed.</p> <p>Appendix K indicates that under Alternative A, throughout the planning area, exceptions to the spatial and seasonal buffers may be allowed.</p>	

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			<p>the RMP is contradictory to the information in Appendix K for Alternative A, which indicates that exceptions, modifications, or waivers would not be allowed. For example, the stipulation for unoccupied raptor nests states that “nests would be protected for a period of seven years... Although an exception may be allowed under certain conditions, no modifications or waivers are allowed.” The conflicting statements should be corrected.</p>		
Westport Oil and Gas Company	O-28	SS32 (SS-F)	<p>This section states that “management of sage grouse under Alternative A would be similar to Alternative D.” It further states that “it is not likely that management decisions under Alternative A would have a greater impact on mineral and energy development than Alternative D.” This presumption is erroneous. The stipulations under Alternative D, provided in Appendix K, contain exceptions for the sage grouse stipulations. However, under Alternative A, there is no provision for exceptions, modifications, or waivers. For example, the stipulation under Alternative A related to sage grouse states the following: “Avoid human disturbance within 0.6 mile of a lek during the breeding season from 1 hour before sunrise to 3 hours after sunrise. Exception: None. Modification: None. Waiver: None.” The contradictory information needs to be corrected.</p>	<p>The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public.</p>	
Westport Oil and Gas Company	O-28	SS33 (SS-G)	<p>This section states that it is unlikely that the impacts from timing restrictions for deer and elk crucial winter range would be substantially more significant than current management “because timing restrictions would be increased only 15 days above the criteria currently used in the Diamond Mountain area and Book Cliffs area.” According to the information in Appendix K, timing restrictions under the existing Book Cliffs RMP timing restrictions are only for crucial winter elk habitat; Brown’s Park and Dry Fork ACECs have stipulations</p>	See comment response SS32.	

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			for crucial deer and elk winter ranges. However, under Alternative A of the Draft RMP, timing restrictions for deer and elk are “planning area wide.” This is unacceptable and must be revised.		
Westport Oil and Gas Company	O-28	SS34 (SS-H)	There is no basis for the statement that a net decrease of no more than 0.4% in the number of predicted oil and gas wells would result from the wildlife mitigation measures. This information must be disclosed.	See comment response ME187.	
Westport Oil and Gas Company	O-28	SS35 (SS-I)	This section states that oil and gas development is a key threat to Book Cliffs listed plant species and was a major factor that lead to their listing under the Endangered Species Act. This statement is contradicted by two government surveys and, as a result is baseless. A BLM report (2002) states that illegal collection of the Uinta Basin hookless cactus, a threatened species, is the prime threat (emphasis added) to the conservation and recovery of the species on Utah BLM lands. It further reports that an estimated 50 to 70 percent of a single Uinta Basin hookless cactus population in the Myton Bench area of the Diamond Mountain resource area was illegally collected in the recent past (BLM 2002. Biological Assessment of Threatened, Endangered and Proposed Plant and Animal Species for the Environmental Assessment for 2-D Seismic Exploration by Veritas DGC Land Inc. Prepared by Bureau of Land Management, Vernal Field Office, Uintah County, Utah). The USFWS also reports that range-wide, the Uinta Basin hookless cactus is a desired species among cactus collectors because of its “beautiful purplish-red flowers.” (U.S. Fish and Wildlife Service 1979. Endangered and Threatened Wildlife and Plants; Determination that Sclerocactus glaucus is a Threatened Species. Federal Register Vol. 44, No. 198). Clearly these impacts have nothing to do with oil	The reports referenced by the commenter are specific to the Uinta Basin hookless cactus, for which collection is a primary threat. However, the statement in question in the RMP refers to all Book Cliffs soil endemics (as an entire group, on a landscape level). Oil and gas development has been identified as a specific threat to these species and played a primary role in their listing. As such, the BLM declines to change the discussion as written.	

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			and gas development. This discussion must be eliminated.		
Westport Oil and Gas Company	O-28	SS36 (SS-J)	This section states that “although most of the riparian zone is listed as NSO, this stipulation could be waived if necessary for transmission lines, roads and surface occupancy.” The conditions for granting of a “waiver” in Chapter 4 of the draft RMP/EIS are inconsistent with the stipulation for riparian floodplains described in Appendix K, which does not grant a waiver to NSO. It allows an “exception,” which is defined in Appendix K as a one-time exemption from a stipulation.	Section 4.15.1.3 in the PRM/FEIS has revised the statement to read as an exception rather than a waiver.	X
Westport Oil and Gas Company	O-28	SS37 (SS-K) JME-36	<p>The DEIS states that “one of the main factors in the listing of the Colorado River fishes was the cumulative effect of water depletion within the Colorado River system” and implies that the requirement of water for oil and gas development is a major factor in water depletion in the Colorado River System.</p> <p>We recommend that BLM limit its consideration to verifiable information. Streamflow regulation and habitat modification associated with water regulation by dams, such as the Flaming Gorge Dam, are identified by the U.S. Fish and Wildlife Service as the primary threat to the endangered Colorado River fish. Since 1950, annual peak flows in occupied razorback sucker habitat upstream of Westwater Canyon have decreased by 29-38%. Flows of the Green River at Jensen, Utah, downstream of one of the principal spawning areas of razorback sucker have decreased by 13-15% during spring and increased from 10-140% from summer to winter, due to regulation by the Flaming Gorge Dam (USFWS 2002. Razorback sucker (<i>Xyrauchen texanus</i>) Recovery Goals: Amendment and Supplement to the Razorback Sucker Recovery Plan.</p>	<p>The PRMP/FEIS does not imply that oil and gas development is a “major” factor in water depletion. Section 4.15.1.3, 2nd paragraph states that:</p> <p>“New depletions from these rivers or changes in the amount of water returned to the rivers would constitute an additional impact on the Colorado River fishes.”</p>	

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			<p>U.S. Fish and Wildlife Service, Mountain-Prairie Region (6) Denver, Colorado).</p> <p>The RMP must clarify that oil and gas development is not the major cause of water depletion of the Green River within the Vernal planning area. The Flaming Gorge Dam and other water-control structures are the main cause of water depletion in the Upper and Lower Colorado River System.</p>		
Westport Oil and Gas Company	O-28	SS38 (SS-L)	<p>All spatial buffers for unoccupied raptor nests under Alternative A are 0.5 mile (except for peregrine falcons). If the factors mentioned in the draft RMP/IEIS are being used to determine spatial buffers, there is no justification for the 0.5 mile buffers identified in the DEIS.</p> <p>BLM must modify the impacts analysis sections for Effects of Special Status Species Decisions on Minerals and Energy Resources by removing the seasonal restrictions tables (Tables 4.8.6, 4.8.7, 4.8.8, and 4.8.9), and the limitations they present, with revised impact analyses for raptors that are based on and will provide foundation for accurate evaluations analysis of existing conditions and an analysis of potential impacts that are based on future site-specific development data and commitments to mitigate impacts to any raptors that would be affected.</p> <p>We also urge BLM to modify the stipulations in Appendix K for raptor nests with stipulations dealing with known current use of nests within one year as opposed to stipulations resulting in protection of unused nests for up to 7 years. The revised impacts</p>	<p>The spatial buffers are based on the raptor BMPs and the IMs as adopted through IM UT 2006-096, Best Management Practices for Raptors and Their Associated Habitats in Utah. These BMPs can be found in Appendix A of the PRMP/FEIS.</p>	

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			analysis should be based on realistic, hard-data-based stipulations and commitments of industry and management agencies to compile current existing data, to conduct any necessary surveys to obtain real-time, site-specific/project-specific data on status of raptor activity, and to develop acceptable site-specific mitigation measures prior to project specific oil and gas activity.		
Westport Oil and Gas Company	O-28	SS39 (SS-M)	This section states that the number of acres open to oil and gas leasing on Vernal BLM lands is 1,776,782 acres. However, Table S.1 and Table 4.8.1 state that the acres open to oil and gas leasing are 1,843,265 acres. These numbers are not consistent. Please correct and give the precise area of the acres in question for further identification, evaluation and consistency review.	Section 4.15.2.3.1.1 in the PRMP/FEIS has been revised to correct the inconsistencies described in the comment.	X
Westport Oil and Gas Company	O-28	SS40 (SS-N)	This section states that Alternative A would increase the proportion of areas surrounding ferruginous hawk nesting sites open to oil and gas development by approximately 2% when compared to Alternative D. BLM must explain how this percentage was determined and exactly what spatial buffer was used.	Calculations are based on areas associated within the ½ mile buffer around known active and inactive ferruginous hawk nests in the VPA. These areas were overlaid onto the oil and gas leasing acreages (by type) to calculate the percentage. However, the areas within the ½ mile buffer zone for active and inactive ferruginous hawk nests will actually be managed under the special stipulations for raptors outlined in Chapter 4. See comment response SS38.	
Westport Oil and Gas Company	O-28	SS41 (SS-O)	This section states that construction and development around bald eagle roosts would be managed under BMPs and include spatial and seasonal buffers. The Draft RMP/EIS does not describe how a bald eagle roost site is determined. Unlike nest sites, roosting structures/habitats of the bald eagle may vary from year to year and a single tree may not serve as a roost	What constitutes a roost site would be determined on a site-specific basis based on the presence of eagles, distance to water, and protection from the elements and human disturbance. Spatial and seasonal restrictions would be determined on a case-by-case basis based on the location and activity at the roost site. Trying to mandate these	

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			site. Would the location of the spatial and seasonal restrictions vary from year to year? Please clarify.	restrictions at this programmatic planning level would not allow the flexibility necessary to ensure that each roost site is protected appropriately.	
Westport Oil and Gas Company	O-28	SS42 (SS-P)	The RMP states that the ferruginous hawk population could be irretrievably lost due to impacts from surface disturbance for mineral development, habitat fragmentation, and habitat loss. The draft RMP/EIS provides no evidence that mineral development has or would cause declines in ferruginous hawk populations. Provide the data in the EIS to support this statement or delete the statement	<p>Section 4.15.6 in the PRMP/FEIS has been revised to add the following information:</p> <p>“As a species ferruginous hawks have two characteristics that seem to make them more susceptible to disturbance-their preference for solitude when nesting and their high dependence on primary prey species (rabbits and/or ground squirrels). Bechard et al. (1990) showed ferruginous hawks’ tendency for solitude by proving that their nest site selection is significantly further from roads and human habitation than other sympatric hawks. White and Thurow (1985) documented ferruginous hawk sensitivity to human disturbances when they found that 33% of briefly disturbed nests were deserted and the other nest had lower fledging success. In years of low prey abundance, sensitivity to disturbance increased and larger buffer zones were recommended to protect nesting pairs. Holmes et al. (1993) documented ferruginous hawk sensitivity to walking and vehicular disturbances and recommended a buffer zone to protect nesting attempts. (Reproductive Success and Nesting Chronology of Ferruginous Hawks in Northwestern Utah From 1997-1999. United States Department of Interior, BLM, Salt Lake Field Office. Page 5 Paragraph 1.</p> <p>Mining disturbance is linked to nest desertion (Olendorff 1993). Pairs nesting near active petroleum wells experience lower productivity than</p>	X

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				<p>those that nest further away. Railroads apparently are not a disturbance, but pairs have been found to nest farther from primary and secondary roads than Swainson's Hawks do. (Bechard et al. 1990)"</p> <p>"Olendorff (1993) attributed population declines to the effects of cultivation, grazing, poisoning, and controlling small mammals, mining, and fire in nesting habitats, with cultivation being the most serious."</p>	
KerrMcGee Oil and Gas Onshore LLC	O-29	SS28 (SS-B)	Section 4.2.8.5 purportedly discloses the effects of special status species resource decisions on mineral resources. However, the impacts to oil and gas development from special resource stipulations are greatly trivialized in the draft RMP	The comment is on the analysis associated with effects of Special Status Species upon Mineral Resources. For those species which are T&E listed, BLM has to mitigate those impacts regardless of the outcome. Impacts to oil and gas development are discussed in Section 4.8.2.5.	
KerrMcGee Oil and Gas Onshore LLC	O-29	SS29 (SS-C)	This sections states that "it would be very rare for any one lease to have so many limitations as to render it inaccessible for energy development." Clearly this statement is erroneous since the ½-mile restrictions around all raptor nests, in combination with big game crucial winter range restrictions, would render some oil and gas leases inaccessible to development. For example, seasonal restrictions for various species of raptors extend from January to August. Critical deer and elk winter range restrictions extend from November to the end of April. Based on these restrictions, there would be only 2 ½ months where oil and gas development would be allowed.	There are exceptions, waivers, and modifications to both of these stipulations, which allow for development under particular circumstances.	
KerrMcGee Oil and Gas Onshore LLC	O-29	SS30 (SS-D)	This section states that "overall, it is estimated that a small number of operators may experience adverse economic effects if drilling operations must be stayed during special status species protection periods or if drilling operations must be moved to another area on	Comment noted.	

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			<p>the lease.” Moving to another area on the lease may not be technically and/or economically feasible. A specific area is chosen for development by the operators because it is the best location for oil or gas development. The same potential is not likely to be present at another location. In addition, 43 CFR 3101.1-2 states that a proposed well location can be moved up to 200 meters (0.12 mile) and the timing of the actual drilling can be delayed no more than 60 days to mitigate environmental concerns. Reference to this regulation appears in Appendix A of the draft RMP/EIS.</p> <p>In addition, the availability of drilling rigs is very limited. An operator might not be able to drill at all in a given year due to timing and spatial stipulations and a, lack of availability of drilling rigs during the limited period when the drilling stipulations do not restrict all construction and drilling activities. Therefore, we strongly object to the minimization of the potential effects to the oil and gas industry of the excessive stipulations in the draft RMP/EIS.</p>		
KerrMcGee Oil and Gas Onshore LLC	O-29	SS31 (SS-E)	<p>This section states that “modifications, exemptions, or waivers may, in some cases, allow mineral development to occur. This would increase the potential number of wells drilled or other mineral development, increase the domestic supply of oil and natural gas or other mineral, and increase royalties to the federal government...”</p> <p>It would be very difficult for the operators to conduct cost-effective operations with the uncertainty of whether waivers, exemptions, or modifications would be granted by the BLM. In addition, this statement in the RMP is contradictory to the information in Appendix</p>	<p>At the time of the on-site, operator requests for exceptions will be reviewed and recommendations will be discussed.</p> <p>Appendix K indicates that under Alternative A, throughout the planning area, exceptions to the spatial and seasonal buffers may be allowed.</p>	

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			<p>K for Alternative A, which indicates that exceptions, modifications, or waivers would not be allowed. For example, the stipulation for unoccupied raptor nests states that “nests would be protected for a period of seven years... Although an exception may be allowed under certain conditions, no modifications or waivers are allowed.” The conflicting statements should be corrected.</p>		
KerrMcGee Oil and Gas Onshore LLC	O-29	SS32 (SS-F)	<p>This section states that “management of sage grouse under Alternative A would be similar to Alternative D.” It further states that “it is not likely that management decisions under Alternative A would have a greater impact on mineral and energy development than Alternative D.” This presumption is erroneous. The stipulations under Alternative D, provided in Appendix K, contain exceptions for the sage grouse stipulations. However, under Alternative A, there is no provision for exceptions, modifications, or waivers. For example, the stipulation under Alternative A related to sage grouse states the following: “Avoid human disturbance within 0.6 mile of a lek during the breeding season from 1 hour before sunrise to 3 hours after sunrise. Exception: None. Modification: None. Waiver: None.” The contradictory information needs to be corrected.</p>	<p>The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public.</p>	
KerrMcGee Oil and Gas Onshore LLC	O-29	SS33 (SS-G)	<p>This section states that it is unlikely that the impacts from timing restrictions for deer and elk crucial winter range would be substantially more significant than current management “because timing restrictions would be increased only 15 days above the criteria currently used in the Diamond Mountain area and Book Cliffs area.” According to the information in Appendix K, timing restrictions under the existing Book Cliffs RMP timing restrictions are only for crucial winter elk habitat; Brown’s Park and Dry Fork ACECs have stipulations for crucial deer and elk winter ranges. However, under</p>	See comment response SS32.	

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			Alternative A of the Draft RMP, timing restrictions for deer and elk are “planning area wide.” This is unacceptable and must be revised.		
KerrMcGee Oil and Gas Onshore LLC	O-29	SS34 (SS-H)	There is no basis for the statement that a net decrease of no more than 0.4% in the number of predicted oil and gas wells would result from the wildlife mitigation measures. This information must be disclosed.	See comment response ME187.	
KerrMcGee Oil and Gas Onshore LLC	O-29	SS35 (SS-I)	This section states that oil and gas development is a key threat to Book Cliffs listed plant species and was a major factor that lead to their listing under the Endangered Species Act. This statement is contradicted by two government surveys and, as a result is baseless. A BLM report (2002) states that illegal collection of the Uinta Basin hookless cactus, a threatened species, is the prime threat (emphasis added) to the conservation and recovery of the species on Utah BLM lands. It further reports that an estimated 50 to 70 percent of a single Uinta Basin hookless cactus population in the Myton Bench area of the Diamond Mountain resource area was illegally collected in the recent past (BLM 2002. Biological Assessment of Threatened, Endangered and Proposed Plant and Animal Species for the Environmental Assessment for 2-D Seismic Exploration by Veritas DGC Land Inc. Prepared by Bureau of Land Management, Vernal Field Office, Uintah County, Utah). The USFWS also reports that range-wide, the Uinta Basin hookless cactus is a desired species among cactus collectors because of its “beautiful purplish-red flowers.” (U.S. Fish and Wildlife Service 1979. Endangered and Threatened Wildlife and Plants; Determination that Sclerocactus glaucus is a Threatened Species. Federal Register Vol. 44, No. 198). Clearly these impacts have nothing to do with oil and gas development. This discussion must be	The reports referenced by the commenter are specific to the Uinta Basin hookless cactus, for which collection is a primary threat. However, the statement in question in the RMP refers to all Book Cliffs soil endemics (as an entire group, on a landscape level). Oil and gas development has been identified as a specific threat to these species and played a primary role in their listing. As such, the BLM declines to change the discussion as written.	

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			eliminated.		
KerrMcGee Oil and Gas Onshore LLC	O-29	SS36 (SS-J)	This section states that “although most of the riparian zone is listed as NSO, this stipulation could be waived if necessary for transmission lines, roads and surface occupancy.” The conditions for granting of a “waiver” in Chapter 4 of the draft RMP/EIS are inconsistent with the stipulation for riparian floodplains described in Appendix K, which does not grant a waiver to NSO. It allows an “exception,” which is defined in Appendix K as a one-time exemption from a stipulation.	Section 4.15.1.3 in the PRM/FEIS has revised the statement to read as an exception rather than a waiver.	X
KerrMcGee Oil and Gas Onshore LLC	O-29	SS37 (SS-K) JME-36	<p>The DEIS states that “one of the main factors in the listing of the Colorado River fishes was the cumulative effect of water depletion within the Colorado River system” and implies that the requirement of water for oil and gas development is a major factor in water depletion in the Colorado River System.</p> <p>We recommend that BLM limit its consideration to verifiable information. Streamflow regulation and habitat modification associated with water regulation by dams, such as the Flaming Gorge Dam, are identified by the U.S. Fish and Wildlife Service as the primary threat to the endangered Colorado River fish. Since 1950, annual peak flows in occupied razorback sucker habitat upstream of Westwater Canyon have decreased by 29-38%. Flows of the Green River at Jensen, Utah, downstream of one of the principal spawning areas of razorback sucker have decreased by 13-15% during spring and increased from 10-140% from summer to winter, due to regulation by the Flaming Gorge Dam (USFWS 2002. Razorback sucker (<i>Xyrauchen texanus</i>) Recovery Goals: Amendment and Supplement to the Razorback Sucker Recovery Plan. U.S. Fish and Wildlife Service, Mountain-Prairie</p>	<p>The PRMP/FEIS does not imply that oil and gas development is a “major” factor in water depletion. Section 4.15.1.3, 2nd paragraph states that:</p> <p>“New depletions from these rivers or changes in the amount of water returned to the rivers would constitute an additional impact on the Colorado River fishes.”</p>	

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			<p>Region (6) Denver, Colorado).</p> <p>The RMP must clarify that oil and gas development is not the major cause of water depletion of the Green River within the Vernal planning area. The Flaming Gorge Dam and other water-control structures are the main cause of water depletion in the Upper and Lower Colorado River System.</p>		
KerrMcGee Oil and Gas Onshore LLC	O-29	SS38 (SS-L)	<p>All spatial buffers for unoccupied raptor nests under Alternative A are 0.5 mile (except for peregrine falcons). If the factors mentioned in the draft RMP/IEIS are being used to determine spatial buffers, there is no justification for the 0.5 mile buffers identified in the DEIS.</p> <p>BLM must modify the impacts analysis sections for Effects of Special Status Species Decisions on Minerals and Energy Resources by removing the seasonal restrictions tables (Tables 4.8.6, 4.8.7, 4.8.8, and 4.8.9), and the limitations they present, with revised impact analyses for raptors that are based on and will provide foundation for accurate evaluations analysis of existing conditions and an analysis of potential impacts that are based on future site-specific development data and commitments to mitigate impacts to any raptors that would be affected.</p> <p>We also urge BLM to modify the stipulations in Appendix K for raptor nests with stipulations dealing with known current use of nests within one year as opposed to stipulations resulting in protection of unused nests for up to 7 years. The revised impacts analysis should be based on realistic, hard-data-based</p>	<p>The spatial buffers are based on the raptor BMPs and the IMs as adopted through IM UT 2006-096, Best Management Practices for Raptors and Their Associated Habitats in Utah. These BMPs can be found in Appendix A of the PRMP/FEIS.</p>	

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			stipulations and commitments of industry and management agencies to compile current existing data, to conduct any necessary surveys to obtain real-time, site-specific/project-specific data on status of raptor activity, and to develop acceptable site-specific mitigation measures prior to project specific oil and gas activity.		
KerrMcGee Oil and Gas Onshore LLC	O-29	SS39 (SS-M)	This section states that the number of acres open to oil and gas leasing on Vernal BLM lands is 1,776,782 acres. However, Table S.1 and Table 4.8.1 state that the acres open to oil and gas leasing are 1,843,265 acres. These numbers are not consistent. Please correct and give the precise area of the acres in question for further identification, evaluation and consistency review.	Section 4.15.2.3.1.1 in the PRMP/FEIS has been revised to correct the inconsistencies described in the comment.	X
KerrMcGee Oil and Gas Onshore LLC	O-29	SS40 (SS-N)	This section states that Alternative A would increase the proportion of areas surrounding ferruginous hawk nesting sites open to oil and gas development by approximately 2% when compared to Alternative D. BLM must explain how this percentage was determined and exactly what spatial buffer was used.	<p>Calculations are based on areas associated within the ½ mile buffer around known active and inactive ferruginous hawk nests in the VPA. These areas were overlaid onto the oil and gas leasing acreages (by type) to calculate the percentage. However, the areas within the ½ mile buffer zone for active and inactive ferruginous hawk nests will actually be managed under the special stipulations for raptors outlined in Chapter 4.</p> <p>See comment response SS38.</p>	
KerrMcGee Oil and Gas Onshore LLC	O-29	SS41 (SS-O)	This section states that construction and development around bald eagle roosts would be managed under BMPs and include spatial and seasonal buffers. The Draft RMP/EIS does not describe how a bald eagle roost site is determined. Unlike nest sites, roosting structures/habitats of the bald eagle may vary from year to year and a single tree may not serve as a roost site. Would the location of the spatial and seasonal	What constitutes a roost site would be determined on a site-specific basis based on the presence of eagles, distance to water, and protection from the elements and human disturbance. Spatial and seasonal restrictions would be determined on a case-by-case basis based on the location and activity at the roost site. Trying to mandate these restrictions at this programmatic planning level	

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			restrictions vary from year to year? Please clarify.	would not allow the flexibility necessary to ensure that each roost site is protected appropriately.	
KerrMcGee Oil and Gas Onshore LLC	O-29	SS42 (SS-P)	The RMP states that the ferruginous hawk population could be irretrievably lost due to impacts from surface disturbance for mineral development, habitat fragmentation, and habitat loss. The draft RMP/EIS provides no evidence that mineral development has or would cause declines in ferruginous hawk populations. Provide the data in the EIS to support this statement or delete the statement	<p>Section 4.15.6 in the PRMP/FEIS has been revised to add the following information:</p> <p>“As a species ferruginous hawks have two characteristics that seem to make them more susceptible to disturbance-their preference for solitude when nesting and their high dependence on primary prey species (rabbits and/or ground squirrels). Bechard et al. (1990) showed ferruginous hawks’ tendency for solitude by proving that their nest site selection is significantly further from roads and human habitation than other sympatric hawks. White and Thurow (1985) documented ferruginous hawk sensitivity to human disturbances when they found that 33% of briefly disturbed nests were deserted and the other nest had lower fledging success. In years of low prey abundance, sensitivity to disturbance increased and larger buffer zones were recommended to protect nesting pairs. Holmes et al. (1993) documented ferruginous hawk sensitivity to walking and vehicular disturbances and recommended a buffer zone to protect nesting attempts. (Reproductive Success and Nesting Chronology of Ferruginous Hawks in Northwestern Utah From 1997-1999. United States Department of Interior, BLM, Salt Lake Field Office. Page 5 Paragraph 1.</p> <p>Mining disturbance is linked to nest desertion (Olendorff 1993). Pairs nesting near active petroleum wells experience lower productivity than those that nest further away. Railroads apparently</p>	X

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				<p>are not a disturbance, but pairs have been found to nest farther from primary and secondary roads than Swainson's Hawks do. (Bechard et al. 1990)"</p> <p>"Olendorff (1993) attributed population declines to the effects of cultivation, grazing, poisoning, and controlling small mammals, mining, and fire in nesting habitats, with cultivation being the most serious."</p>	
Vermillion Ranch Limited Partnership	O-33	SS151 (R-SS1)	<p>Modify the following statement as indicated:</p> <p>"Implement the management necessary to increase populations of special status species, including federally listed animal species, and restore them to their historic ranges by enhancing, protecting, and restoring known and potential habitat"</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>	
Vermillion Ranch Limited Partnership	O-33	SS151A (R-SS1)	<p>The criteria should not be restoration to historic range. First, little, if anything, is actually known about historic ranges or wildlife populations. Second, what is often written about historic wildlife ranges is based on conjecture not data. It is neither feasible nor practical to restore these species to their alleged historic range.</p>	<p>See comment response SS2A.</p>	
Vermillion Ranch Limited	O-33	SS152 (R-SS2)	<p>Modify the following statement as indicated:</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p>	

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Partnership			<p>"The minerals development land categorization proposed in Alternative A may would have multiple short-term and long-term, direct and indirect adverse impacts on greater sage grouse populations in the VPA. These impacts include categorizing a large majority of the important greater sage grouse winter and brooding habitat as open to minerals development. These designations would likely have impacts similar to those described for ferruginous hawks."</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>	
Vermillion Ranch Limited Partnership	O-33	SS152A (R-SS2)	<p>The DEIS needs to address the effects of sport hunting as well on sage grouse populations. The RMP omits entirely the fact that sage grouse are still hunted for several months out of the year. If populations are seriously declining, one would assume that UDWR would cancel hunts for a few seasons.</p>	<p>Hunting is regulated by the UDWR and is outside of the scope of the RMP.</p>	
Vermillion Ranch Limited Partnership	O-33	SS152B (R-SS2)	<p>Research does not support the assumption of adverse impacts from mineral development. Comments submitted to the USFWS opposing the listing of the sage grouse strongly suggest that neither livestock grazing nor oil and gas development are directly connected to reported declines in sage grouse. Certainly recent drought is a factor, which is largely ignored. This discussion needs to be modified to reflect other scientific viewpoints.</p>	<p>The potential impacts of mineral development to sage grouse habitat that are described in the Draft EIS are due to the potential removal of that habitat. Citations regarding research on drought, mineral, and grazing impacts on sage grouse habitat will be provided in the Final EIS.</p> <p>The section the commenter is referring to addresses impacts of minerals decisions on special status species. Impacts from other resource decisions are discussed elsewhere in the document.</p> <p>Information and references have been added to the Final EIS to support the assertion of impacts to sage-grouse habitat from mineral development.</p>	X

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Vermillion Ranch Limited Partnership	O-33	SS153 (R-SS3)	<p>Modify the following statement as indicated:</p> <p>"The minerals development proposed in Alternative A, where surface excavation would occur in a prairie dog town, may have multiple short-term and long-term, direct and indirect adverse impacts on white-tailed prairie dogs and where the black-footed ferret has been introduced, on their populations in the VPA."</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>	
Vermillion Ranch Limited Partnership	O-33	SS153A (R-SS3)	<p>This statement is inaccurate unless it is qualified. The prairie dog is unaffected and actually prefers areas where there is no vegetation. Adverse effects are caused by</p> <p>excavating the prairie dog town, since the dogs die from suffocation. This is not a long-term adverse effect, since prairie dogs will return to or expand into adjacent areas and reproduce at high rates. Similarly the only effect on the black-footed ferret will be where the excavation occurs and the ferret has been reintroduced. Unless the area is paved, prairie dog habitat is not adversely affected by surface disturbance other than direct excavation of the towns.</p>	Comment noted.	
Julander Energy	O-34	SS69 (JSS-26)	<p>The RMP says "Change in prairie dog prey base within Coyote Basin experimental population through the conversion of open, sparse grassland to a different habitat type." Oil and gas operations do not "convert open sparse grassland to a different habitat type". Experience shows oil and gas creates prairie dog</p>	Comment noted.	

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			habitat. See Moxa, Rangely, Meeteetsee: the Conservation Assessment and ACEC nomination indicate oil and gas fields are the best (exemplary) white-tailed prairie dog habitat. The discussion about overall threats to black-footed ferrets, which rely on prairie dogs, discusses threats to the prairie dogs, which do not include oil and gas operations.		
Julander Energy	O-34	SS70 (JSS-27)	The protection of unoccupied nest for 7 years with spatial buffers as per Appendix M of the USFWS Guidelines for Raptor Protection is not available for review. The protections provided include ferruginous hawks, and burrowing owls both of which also provide significant protection to the WTPD.	See comment response SS19.	
Julander Energy	O-34	SS71 (JSS-28)	Neither of these sections discusses white-tailed prairie dogs or black-footed ferrets, indicating the appropriate lack of priority afforded these species.	See comment response SS61.	
Julander Energy	O-34	SS72	[The State of] Utah and BLM have implemented an April 1-June 15 closure on shooting to protect white-tailed prairie dogs during whelping season and a year-round closure on shooting in the black-footed ferret reintroduction area. There are two issues here: 1) Shooting was shown in the Conservation Assessment and in the FWS 90 Day Finding not to be a significant problem; 2) If there is a ban on shooting and it is not being followed, there is an enforcement problem, not an oil and gas problem.	Seasonal closures on wildlife are the responsibility of UDWR.	
Julander Energy	O-34	SS72 (JSS-29)	The DEIS states "For example, increased access into prairie dog sites will increase mortality by shooters and indirectly impact all the species associated with them."	Comment noted.	
Center for Native Ecosystems	O-38	SS44 (JSS-2)	SSS goals and objectives include "implement the management necessary to increase populations of special status species...and restore them to their historic ranges by enhancing protecting and restoring	The RMP states that there will be a potential for a loss of some habitat and individual species cumulatively for all activities. Mitigation measures are used to lessen foreseeable impacts to maintain	

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			known and potential habitat". This is an admirable goal, but the plan is not serious about attaining it; the draft RMP admits that special status species will continue to decline under all alternatives.	the ability of species existence and with monitoring and management changes, work toward the goal of increasing the populations.	
Center for Native Ecosystems	O-38	SS45 (JSS-3)	SSS goals and objectives include "manage all T&E plant species and the habitat upon which they depend upon in such manner as to conserve and recover these species to the point where the requirements of ESA are no longer necessary." This is an admirable—and required—goal, but the BLM admits later that at least Alternative B won't just fail to recover the species, it would place Bookcliffs soil endemics at substantial risk and potentially result in jeopardy to listed species and/or the listing of previously candidate or sensitive species as T or E (4-243), and even Alt C would maintain the current condition that is one of continued risk for endemics (4-244).	Comment noted.	
Center for Native Ecosystems	O-38	SS46 (JSS-4)	Says all alternatives will maintain and enhance white-tailed prairie dog habitat, but page 4-242 admits that the preferred alternative will decrease the proportion of white-tailed prairie dog habitat subject to special stipulations by approx 30%.	The management action referred to on page 2-32 of the Draft RMP is meant as a management goal to restore and maintain prairie dog habitat wherever possible. It does not mean that all other activities that could impact prairie dog habitat would be curtailed.	
Center for Native Ecosystems	O-38	SS47 (JSS-4)	Vernal FO has not demonstrated that it is capable of development oil and gas resources without adversely affecting special status species. FO has a track record of permitting activities that degrade ecosystem health and endanger imperiled species. There is no indication that the Vernal FO is capable of adequately mitigating oil and gas drilling. Therefore the agency should not permit additional development in habitat for special species and should ensure that leases stipulate no ground disturbance (including no surface occupancy) with no waivers, exceptions or modification in special	FLPMA mandates that lands be managed for multiple use and sustained yield (FLPMA Section 102 (a) (7)). This includes preserving ecological values while allowing for human occupancy and use (FLPMA Section 102 (a) (8)). The purpose of this planning EIS is to analyze a range of alternatives that allow for multiple use while maintaining the long-term sustainability of the ecosystem, including ensuring the population viability of TES species as mandated in the ESA. The alternatives analyzed provide a range of development opportunities and	

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			<p>species' habitat. Instead, the BLM admits that new oil and gas drilling will be concentrated in these sensitive areas (p 4-240). This irresponsible development violates FLPMA and ESA and this set of alternatives cannot be considered "reasonable" under NEPA.</p>	<p>this EIS will disclose how much development can be allowed while still meeting the requirements of FLPMA and ESA. All of the alternatives retained for detailed analysis are "reasonable" in that they meet the purpose and need of the project (managing for multiple use) while trying to resolve resource conflict (TES species vs. oil and gas development). To completely prohibit oil and gas development in sensitive species habitat without analyzing the potential impacts to both the human and natural environment would be a violation of NEPA, which indicate that alternatives should be analyzed in cases of unresolved resource conflict (NEPA Section 102 (2)(e))</p>	
Center for Native Ecosystems	O-38	SS48 (JSS-5)	<p>BLM has not met its special species obligations. The draft RMP discusses the BLM's obligation not to contribute to the need to list sensitive species under ESA but it has other obligations as well. IM 7-118, BLM Manual 6840.06, BLM Manual 1622.1, BLM Land Use Handbook all require that BLM id species, habitat, and manage for recovery and that land use decisions be consistent with those mandates. Rather than planning for recovery and expansion of special status species, the stated goal on page 202 is much more modest: "desired species including native, T&E and special status, are maintained at a level appropriate for the site and species involved."</p>	<p>Table 2.1.21 (Special Status Species) of the PRMP/FEIS proposes several goals and objectives common to all for special status species. They are as follows:</p> <ul style="list-style-type: none"> Conserve and protect special status species and enhance their habitats. Implement recovery measures for special status species, including listed species and the ecosystems on which they depend. Mitigate or reduce long-term habitat fragmentation through avoidance and site-specific reclamation to return areas to productive levels. Manage all listed T&E plant species and the habitats upon which they depend in such a manner as to conserve and recover these species to the point where the requirements of the Endangered Species Act are no longer necessary. Manage non-listed sensitive species and the 	

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				<p>habitats upon which they depend in such a manner as to preclude the need to list them as either threatened or endangered under the Endangered Species Act. The guidance for this management is put forth in the BLM 6840 Manual.</p> <p>Implement the specific goals and objectives of recovery plans, conservation agreements and strategies, and approved activity level plans. BLM would continue to work with USFWS and others to ensure that plans and agreements are updated as necessary to reflect the latest scientific data.</p> <p>Implement the direction contained in the Northwest National Fire Plan Project Design and Consultation Process and the Counterpart Regulations including Alternative Consultation Agreements.</p> <p>Implement the management necessary to increase populations of special status species, including federally listed animal species, and restore them to their historic ranges by enhancing, protecting, and restoring known and potential habitat.</p>	
Center for Native Ecosystems	O-38	SS49 (JSS-6)	<p>"Pariette cactus is endangered because of BLM's mismanagement". This is one of the most endangered species in the Vernal FO, yet it is not even addressed in this plan.</p> <p>We understand the Castle Peak/Eightmile Flat EIS is being revised now to address this oversight. The BLM must also revise any BA it has drafted for the RMP to include an analysis of the impacts on Pariette cactus. Pariette cactus is included separately from Uintah basin hookless cactus on the Utah BLM's sensitive species list, and there is no credible explanation for not completing an impacts analysis for this species. P 2-28</p>	Information concerning the taxonomic changes to Sclerocactus glaucus has been addressed in Section 4.15.2.3.1.1 of the PRMP/FEIS.	

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			(desc. of Pariette Wetlands ACEC) does not make reference to the cactus, despite it being a major reason for its designation. The RMP states that the ACEC will be managed as NSO but the BLM has not required that in the draft Castle Peak/Eightmile Flat EIS. We strongly support NSO throughout this ACEC.		
Center for Native Ecosystems	O-38	SS50 (JSS-7)	Draft RMP identifies Monument Butte-Red Wash area as center of oil and gas drilling operations. BLM must provide adequate mitigations for Pariette cactus, Uintah basin hookless cactus and other special status species for drilling and leasing to continue legally.	The BLM is required to conduct a presence/absence survey for special status species before construction of any project. If any special status species are found in the project area, the BLM would require avoidance of these species. If avoidance is not feasible, BLM would consult with the FWS regarding adequate mitigation for potential species impacts. All oil and gas applications for permits to drill (APD) will be subject to site-specific NEPA to ensure that these permit approvals comply with ESA and BLM policy.	
Center for Native Ecosystems	O-38	SS51 (JSS-8)	Table 4.13.1 suggests that soils in the Monument Butte-Red Wash are highly erodible and highly saline. BLM must carefully analyze the impacts of drilling in the proximity of the Green River on the listed Colorado River fish and mitigate for impacts to these species and to their designated critical habitat.	The BLM has analyzed the potential impacts to the listed Colorado River fish resulting from energy development in the Monument Butte-red Wash area.	
Center for Native Ecosystems	O-38	SS52 (JSS-9)	<p>BLM's main commitment to Graham's penstemon in the draft RMP is that it will implement the "conservation plan" for this species; however, this document does not provide management prescriptions.</p> <p>RMP should be the BLM's opportunity to ensure that every population of this species is protected adequately from oil and gas drilling, ORV use etc. We strongly urge that the BLM consult with the Service about what mgt prescriptions should be adopted for this species, which clearly seems to be on track for</p>	The BLM is committed to implementing the conservation measures contained in the Conservation Agreement. These are specific measures designed to protect and manage the species. Measures include inventory, monitoring, and avoidance activities.	

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			ESA listing. If nothing else, this could avoid the BLM from having to substantially amend the RMP after this listing is complete.		
Center for Native Ecosystems	O-38	SS53 (JSS-10)	Graham's and White River penstemon not listed in the oil-shale endemics page 4-233 says that Graham's penstemon is in severe decline, but only lists the reed-mustards as species restricted to oil shale formations.	Clay reed mustard is not an oil shale endemic. Section 4.15.1.3 in the PRMP/FEIS has been revised to read: "This threat is particularly high for shrubby reed mustard, White River beardtongue and Graham's beardtongue, as they are restricted to geologic formations containing oil shale."	X
Center for Native Ecosystems	O-38	SS54 (JSS-11)	List of impacts should include loss of pollinators (perhaps this is what "potential loss of long-term reproduction capabilities" alludes to but this should be spelled out) Pages 4-240-41 avoids this analysis by saying that studies of these impacts...are limited and few conclusions can be drawn. There is a large body of literature and field studies available, BLM's positions is arbitrary and capricious. Best available science indicates that these are plants will be adversely affected by the continuing fragmentation of their habitat and of their pollinators.	In cooperation with the USFWS, and in conformance with the ESA, the Vernal FO has established conservation plans which will allow for protection of pollinators based on current information. Table 2.1.21 in the PRMP/FEIS (Vegetation) states in the Management Common to All: "BLM would continue to work with USFWS and others to ensure that plans and agreements are updated as necessary to reflect the latest scientific data. Recovery plans have been finalized for Uinta Basin hookless cactus, shrubby reed-mustard, and clay reed-mustard. A draft plan is being developed by the USFWS for Ute ladies' tresses. A Conservation Plan has been prepared for Astragalus equisolensis, Penstemon goodrichii, Penstemon grahamii and Penstemon scarious var. albifluvis."	
Center for Native Ecosystems	O-38	SS55 (JSS-12)	The draft RMP concludes that "The potential impacts to Uintah Basin hookless cactus, clay reed mustard, shrubby reed mustard, Graham's beardtongue, and	Although the potential effects of oil and gas development are expected to be high, standard stipulations for oil and gas development allow for	X

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			<p>White River beardtongue are expected to be high with oil, gas and coal bed methane development". Clearly the BLM is violating ESA, NEPA, FLPMA, and APA by allowing high levels of impacts in habitat for extremely narrowly distributed listed and candidate plant species under the preferred alternative.</p>	<p>movement of drilling operations to avoid and/or minimize impacts to these species. The determination regarding specific avoidance or mitigation measures are necessary to comply with ESA, NEPA, FLPMA, and APA will be determined at the site-specific level. The Final EIS has been amended to include information regarding the range of avoidance and mitigation options for these species, as well as the projected impacts subsequent to implementation of these measures.</p>	
Center for Native Ecosystems	O-38	SS56 (JSS-13)	<p>The Vernal FO has a special responsibility for white-tailed prairie dog management. Coyote Basin is one of the few areas where the white-tailed prairie dog ecosystem remains relatively intact; it is the premier complex in Utah. We applaud the BLM for designating at least a portion of this as an ACEC in every alternative. However, the plan does little to conserve this complex and recover the species. Page 2-32 states that "all alternatives will maintain and enhance the white-tailed prairie dog... habitat..." There is no indication that BLM intends to carry this out and no explanation as to how they intend to do this. Page 2-38 just says BLM will "participate in the development of a conservation plan". There is no direction to even implement the plan, just help with the preparation. BLM should provide interim management prescriptions as well. The Prairie Dog Conservation Team was very clear in their Conservation Assessment that the BLM must make management changes if the white-tailed is to be recovered and ESA listing avoided.</p>	<p>Table 2.1.18 (Special Designations – ACECs) in the PRMP/FEIS includes a summary of the measures that would be implemented for the alternatives that would manage white-tailed prairie dog in the Coyote Basin ACEC. They include controlling noxious weeds, restoring a historic fire regime, managing for ferret habitat and prey base, and implementing a monitoring program.</p>	
Center for Native Ecosystems	O-38	SS57 (JSS-14)	<p>White-tailed prairie dog shooting should be prohibited throughout each of the ACECs. Closures must be enforced and the consequences of noncompliance must serve as deterrents to violation.</p>	<p>Hunting is regulated by the UDWR and is outside of the scope of the RMP.</p>	

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Center for Native Ecosystems	O-38	SS58 (JSS-15)	BLM should maintain a ban on prairie dog poisoning and clearly inform all lessees and adjacent private property owners that white-tailed prairie dog poisoning will not be tolerated. Suspected poisoning events should be investigated and the consequences of noncompliance must serve as deterrents to violation.	The PRMP/FEIS will not authorize poisoning. Should such an event occur, that BLM will thoroughly investigate the situation.	
Center for Native Ecosystems	O-38	SS59 (JSS-16)	Each ACEC should be evaluated for its value as a white-tailed prairie dog relocation site. Relocation plans should be developed for those portions of these ACECs that represent high value relocation areas. While private landowners should pay for relocation costs plus a surcharge devoted to prairie dog mgt, the BLM should facilitate the relocation of prairie dogs from colonies that face imminent destruction on private lands. Relocation should be accomplished using protocols that have proved successful for other prairie dog species while protocols specific to white-tailed prairie dogs are developed.	Each proposed ACEC was evaluated for prairie dog potential. ACEC evaluations are found in Appendix G of the PRMP/FEIS.	
Center for Native Ecosystems	O-38	SS60 (JSS-17)	Plague monitoring through collection of fleas and testing of prairie dog carcasses should be conducted in areas with suspected prairie dog declines and in all black-footed ferret reintroduction areas. At present, dusting burrows with insecticides is advised in colonies where plague is known to be active. Because existing insecticides are not flea-specific, dusting burrows to limit the spread of plague should be seen as a temporary measure to be applied in areas without significant non-target species concerns.	Comment noted.	
Center for Native Ecosystems	O-38	SS61 (JSS-18)	Black footed ferret recovery should be a priority throughout the Uinta Basin. As one of only a few reintroduction sites, Coyote Basin and the Vernal FO in general are very important to the recovery of this species. Page 2-31 states that BLM will continue to implement goals of recovery plan by augmenting	Section 4.14.1.3.2 in the PRMP/FEIS describes the range of protection measures for the white-tailed prairie dog.	

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			existing population in the Snake John Wash area. We support this, but also urge the BLM ensure white-tailed prairie dog populations are actively conserved and recommend protecting and augmenting other parts of the Coyote Basin complex including the Shiner sub-complex if population levels recover.		
Center for Native Ecosystems	O-38	SS62 (JSS-19)	The list of potential reintroductions on page 2-38 does not include black-footed ferrets; this should be corrected. BLM should also consider whether lynx, wolf or wolverine reintroduction might be feasible during the life of the plan.	<p>The reintroduction of black-footed ferrets is addressed as a separate issue under Table 2.1.21 (Special Status Species) of the PRMP/FEIS.</p> <p>Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS indicates that reintroductions under this plan would involve, but may not be limited to, native species such as Rocky Mountain big horn sheep, moose, bison, Colorado River cutthroat trout, and wild turkey. This allows the BLM the flexibility to consider the reintroduction of other species.</p> <p>This section also indicates that:</p> <p>"Potential reintroduction of gray wolves would be made in consultation with the UDWR, USFWS, Ute Tribe, counties, and private landowners through the Resource Advisory Council process for public involvement."</p>	
Center for Native Ecosystems	O-38	SS63 (JSS-20)	Page 4-236 lists overall threats to black-footed ferrets, but only seems to contemplate habitat conversion to agriculture as a factor causing habitat loss. BLM must consider contribution of oil and gas development to habitat loss, degradation and fragmentation for the white-tailed prairie dog and thus the ferret. Page 4-242 includes the troubling statement that "For this analysis it was assumed that black-footed ferrets are completely	<p>The potential impacts of mineral and energy development on black-footed ferrets is discussed for each alternative in Sections 4.15.2.3.1.2, 4.15.2.3.2.2, 4.15.2.3.3.2, and 4.15.2.3.4.</p> <p>The statement regarding the assumption of the black-footed ferrets dependence on white-tailed</p>	

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			dependent upon white tailed prairie dog towns for survival..." There should be absolutely no question that ferrets are dependent upon prairie dogs for both food and shelter. They are widely known as prairie dog obligates and only known to inhabit prairie dog colonies.	prairie dogs is merely provided in order to clarify for readers unfamiliar with the ferret-prairie dog relationship the assumptions upon which analysis was conducted.	
Center for Native Ecosystems	O-38	SS64 (JSS-21)	Sage Grouse management should, at a minimum, follow the guidelines in Connelly et al. 2000. The draft RMP only implements sage grouse management under Alternative C, even though they admit on Page 4-116 that it is not likely that management decisions under Alternative C would have a greater impact on mineral and energy development than Alternative D--No action. This is totally arbitrary; the BLM is compromising sage grouse management without even providing any benefit to the oil and gas industry according to its own analysis. Page 4-115 admits that the preferred alternative will simply maintain the status quo, (a declining trend for the sage grouse). Page 4-234 states that under all alternatives, large areas associated with...sage grouse habitat would be open for oil and gas and mineral development. This cannot be considered a reasonable range of alternatives. Impacts of the preferred alternative (Page 4-242) would include categorizing a large majority of important greater sage grouse winter and brooding habitat as open to minerals development.	Table 2.1.21 (Special Status Species) of the PRMP/FEIS indicates that sage grouse management would be undertaken under all alternatives, but would take a different form for each alternative. Under Alternative A, the Strategic Management Plan (SMP) for Sage Grouse (State of Utah, 2002) would be adopted and implemented. Under Alternative B, spatial and seasonal buffers comparable to the SMP would be adopted. Under Alternatives C and E, Connelly's Guidelines to Manage Sage Grouse Populations and Their Habitats would be implemented. Under Alternative D, spatial and seasonal buffers would be implemented but would differ somewhat from those implemented under the other alternatives. Timing and controlled surface use stipulations (spatial and seasonal buffers) would be implemented under all alternatives in relationship to sage grouse leks in order to minimize the impact of minerals and energy development on sage grouse.	
Center for Native Ecosystems	O-38	SS65 (JSS-22)	Grazing has very real impacts on sage grouse habitat quality, yet there seems to be no discussion of the impacts on grazing on sage grouse under the different alternatives. This partly seems to be because the plan is so vague: page 4-245 states "impacts would be either beneficial or adverse, depending on whether the improvement	The potential impacts of livestock grazing on special status species are discussed under Section 4.15.2.2.	

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			made for livestock grazing resulted in moving livestock out of special species (sic) status habitat or concentrating them in new habitats. The exact locations of the rangeland treatment are presently unknown." The BLM at a minimum should adopt the grazing management prescriptions in Connelly et al. (2000).		
Center for Native Ecosystems	O-38	SS66 (JSS-230)	Disturbance and loss of habitat from oil and gas development should be included on this list of impacts on Mexican Spotted Owls. The Preferred Alternative would open more spotted owl habitat to oil and gas leasing and would decrease the extent of protective stipulations in owl habitat. Page 4-242 says that most of the increased oil and gas development and reductions in special status stipulation designations would occur in the canyon habitat immediately adjacent to designated CH and in areas in which much suitable habitat for the spotted owl occurs. The BLM must consult with the Service on this proposal, which could easily constitute take or adverse modification of critical habitat. Even Alter native C includes a 23% reduction in protective measures (4-245).	<p>The potential impact on Mexican Spotted Owls from habitat disturbances related to minerals and energy development are acknowledged in Sections 4.15.1.3, 4.15.2.3.1.2, 4.15.2.3.2.2, 4.15.2.3.3.2, and 4.15.2.3.4.</p> <p>As indicated in Table 2.1.21 (Special Status Species) of the PRMPR/FEIS under all alternatives the BLM would continue to work with the USFWS and others to ensure that plans and agreements regarding the Mexican spotted owl (and other species) are updated and implemented during the life of the RMP. In Section 2.4.13.4.2.2, the BLM, under all alternatives, commits to collaborating with the USFWS, DWR, and other partners to develop habitat management plans or conservation strategies for sensitive species.</p>	
Center for Native Ecosystems	O-38	SS67 (JSS-24)	The ferruginous hawk is a threatened species. In 2003, FWS described several oil and gas EAs that it believed were in violation of the Diamond Mountain RMP's direction regarding ferruginous hawks and concluded that current management direction will lead to population declines and therefore may not meet responsibilities under Executive Order 13186. This RMP should have been an opportunity to the BLM to affirm its commitment to conserving ferruginous hawks in the Uinta Basin. Instead BLM is offering up even	<p>Table 2.1.21 (Special Status Species) of the PRMP/FEIS and Appendix K contain the management measures specific to the protection of ferruginous hawks and their habitat.</p> <p>The Utah BLM has adopted the BMPs for Raptors and Their Associated Habitats in Utah, IM UT 2006-096. Detailed guidelines for implementing waivers to stipulations are found in Appendix A of the</p>	

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			more habitat.	PRMP/FEIS. None of the alternatives are in violation of the Migratory Bird Treaty Act (EO13186).	
Center for Native Ecosystems	O-38	SS68 (JSS-25)	FWS Raptor guidelines should be incorporated in all RMPs. Only Alternative C implements the Service's raptor guidelines. BLM has chosen a weaker, arbitrary standard for the preferred alternative. BLM should simply use the Service's buffers rather than something they say is "comparable". Also, the BLM's guidelines are very vague about when waivers could be granted. Alternative B even waives buffers for occupied nests, which seems to be a clear violation of the Migratory Bird Treaty Act. It is not reasonable to include illegal alternatives in the EIS. Alternative C is less restrictive than the no action alternative for many raptors.	<p>The incorporation of FWS raptor guidelines is not a legal requirement for an RMP. The Utah BLM has adopted the BMPs for Raptors and Their Associated Habitats in Utah, IM UT 2006-096. Detailed guidelines for implementing waivers to stipulations are found in Appendix A of the PRMP/FEIS.</p> <p>None of the alternatives are in violation of the Migratory Bird Treaty Act. The Migratory Bird Treaty Act does not require buffers around occupied nests. It specifically stipulates that it is illegal to</p> <p>“...pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird.”</p> <p>None of these illegal actions are proposed in any of the alternatives.</p>	
Enduring Resources	O-40	SS43 (JSS-1)	<p>Peregrine Falcon-protect and enhance habitat in Pariette Draw, along Green River, White River, Bitter creek and other drainages.</p> <p>Black footed Ferret- BLM would manage the black-footed ferret consistent with the 1999 Black-footed Ferret reintroduction Plan....</p>	<p>Data on crucial habitat for the Peregrine falcon was brought forward from the Diamond Mountain RMP.</p> <p>Data on crucial habitat for the Black-footed ferret is described in the references cited in the Diamond Mountain RMP, the 1999 Black-footed Ferret</p>	

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			<p>We did not find any data enclosed with the RMP to support the assertion that the area provides crucial habitat for these species.</p> <p>IPAMS/PLA memo dated 4/14 2005 states that all released ferrets are considered to be "experimental, non-essential populations" and are treated as "proposed" rather than endangered.</p>	<p>Reintroduction Plan Amendment, and the Cooperative Plan for the Reintroduction and Management of Black-footed Ferret in Coyote Basin, Uintah County, Utah .</p>	
Utah Petroleum Association	O-42	SS37 (SS-K) JME-36	<p>The DEIS states that "one of the main factors in the listing of the Colorado River fishes was the cumulative effect of water depletion within the Colorado River system" and implies that the requirement of water for oil and gas development is a major factor in water depletion in the Colorado River System.</p> <p>We recommend that BLM limit its consideration to verifiable information. Streamflow regulation and habitat modification associated with water regulation by dams, such as the Flaming Gorge Dam, are identified by the U.S. Fish and Wildlife Service as the primary threat to the endangered Colorado River fish. Since 1950, annual peak flows in occupied razorback sucker habitat upstream of Westwater Canyon have decreased by 29-38%. Flows of the Green River at Jensen, Utah, downstream of one of the principal spawning areas of razorback sucker have decreased by 13-15% during spring and increased from 10-140% from summer to winter, due to regulation by the Flaming Gorge Dam (USFWS 2002. Razorback sucker (<i>Xyrauchen texanus</i>) Recovery Goals: Amendment and Supplement to the Razorback Sucker Recovery Plan. U.S. Fish and Wildlife Service, Mountain-Prairie Region (6) Denver, Colorado).</p>	<p>The PRMP/FEIS does not imply that oil and gas development is a "major" factor in water depletion. Section 4.15.1.3, 2nd paragraph states that:</p> <p>"New depletions from these rivers or changes in the amount of water returned to the rivers would constitute an additional impact on the Colorado River fishes."</p>	

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			The RMP must clarify that oil and gas development is not the major cause of water depletion of the Green River within the Vernal planning area. The Flaming Gorge Dam and other water-control structures are the main cause of water depletion in the Upper and Lower Colorado River System.		
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS141 (NSS1)	Planning now to protect sensitive lands and at-risk species over the life of the RMP will limit the opposition to final plan and facilitate its rapid implementation.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS142 (NSS2)	BLM does not propose meaningful measures to avoid or limit the impact of work with respect to wildlife and special status species.	See comment response SS140.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS143 (NSS3)	In order to protect the wildlife populations within the VPA, including special status species, BLM should specifically identify a management objective of no net loss of habitat, maintenance of native vegetation communities in large and continuous stands wherever possible, and of reducing habitat fragmentation for special status species. By adopting the designations and protective measures set out in the Greater Dinosaur/Book Cliffs Heritage Plan, BLM can implement such an approach.	<p>The RMP proposes similar objectives in Management Common to All. They are:</p> <p>Mitigate or reduce long-term habitat fragmentation through avoidance and site-specific reclamation to return areas to productive levels.</p> <p>Ensure that management of native and naturalized plant species enhances, restores, and does not reduce the biological and genetic diversity of natural ecosystems.</p> <p>Conserve and protect special status species and enhance their habitats.</p>	

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Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS144 (NSS4)	We recommend that certain exotic species be controlled and/or eliminated in core areas. Species such as exotic trout and monocultures of noxious weeds are especially detrimental in these areas.	Control of exotic trout falls under the jurisdiction of UDWR. See Rangeland Health Standard 3 in Table 2.1.13 (Range Improvements) of the PRMP/FEIS for control of noxious weeds.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS145 (NSS5)	Monitoring of habitat, focal species, and habitat function should establish critical thresholds needed for species (especially carnivore) persistence.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS146 (NSS6)	BLM has not provided sufficient protections for special species and sensitive areas against the negative impacts of grazing.	<p>Under the Fundamentals of Rangeland Health as provided by regulations, developed by the Secretary of the Interior on February 22, 1995, the following conditions must exist on BLM lands:</p> <p>"Habitats; are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered Species, Federal proposed, Category 1 and 2 Federal candidate and other special status species."</p> <p>See comment response SS106.</p>	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS147 (NSS7)	<p>This paragraph states that Alternative A would allow impacts to special status species plants.</p> <p>BLM should assess the management that will ensure viable populations of sensitive species. This conclusion [of the referenced paragraph] indicates that the proposed action would permanently impair public land values, a finding that is in conflict with BLM</p>	The BLM must manage lands under its jurisdiction for multiple use and sustained yield and provide for authorized land uses, such as grazing, to the extent that they are compatible with the overall mandate, federal law, and agency policy. The paragraph in question discusses the potential risks to special status species from grazing. These risks are not absolute. In order to address undue impacts to special status species from grazing and other land	

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			obligations.	uses, the BLM engages in a long-term monitoring program geared to ensure adherence with the Fundamentals of Rangeland Health (see the response to Comment SS146) and makes adjustments to land uses accordingly.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS148 (NSS8)	In order to mitigate the environmental consequences of oil and gas development, BLM must use scientifically-based mitigation measures (such as the buffer for sage grouse leks identified earlier), define the actions to be taken, incorporate them into leases, and ensure they will be applied and enforced.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS149 (NSS9)	Based on the analysis set out in Wildlife at a Crossroads, we recommend that BLM develop and implement road closure plans and other restrictive stipulations to achieve these scientifically-derived standards within crucial winter range and migration routes: Mule deer: Provide core habitat and migration routes that are greater than 1,542 feet from a road; Pronghorn: Provide core area that is farther than 3,168 feet from a road and limit road densities to less than 1 mile per square mile; Elk: Reduce road densities to less than 1 mile per square mile; Sage grouse: Implement seasonal road restrictions barring traffic within 656 feet of winter habitat, within 3 miles of leks, nesting and brood-rearing areas. Impose a 30 mph speed limit during non-restricted hours.	Figure 35 of the Draft EIS indicates wildlife habitat that is 660 feet, 1,320 feet, and 2,640 feet from the effects of roads. This includes habitat for mule deer, pronghorn, elk, and sage grouse. BLM has considered the restrictions recommended in this comment but has determined that implementation of these restrictions would prevent other resource uses that are also part of the project purpose and need. These include the maintenance of existing travel corridors, mineral leasing, and development of recreational facilities. BLM has included a range of alternatives which includes restrictions on disturbance in crucial deer and elk habitat; as well as restrictions on activities in the vicinity of sage grouse leks (See Table 2.1.21 (Special Status Species) of the PRMP/FEIS).	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SS150 (NSS10)	A map should be included that displays critical and high-value habitat for key wildlife species found in this planning area, particularly for species at risk highlighting which of these important wildlife lands are unsatisfactory (fail to meet RLH standards).	Map 34 of the PRMP/FEIS shows habitat for key wildlife species in the planning area. Chapter 3 describes the status of that habitat.	

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State of Utah	G-1	SW19	<p>Alternatives A and C indicate "Old fields would be irrigated and existing ditches and diversion structures would be restored on acquired lands in Bitter Creek and Rat Hole Drainages." This wording gives the impression that said lands are not being irrigated at present. If such is the case, and the lands have not been irrigated for five consecutive years, then the underlying water rights may be lost through non-use (See Sec. 73-1-4 UCA). The BLM is advised to review the above referenced section of the law and take appropriate action to confirm the legal status of the underlying water rights.</p>	<p>The review of the status of the water rights of individual users is outside the scope of this document. However, the BLM does review water rights on a regular basis as a matter of ongoing land management.</p>	
State of Utah	G-1	SW20	<p>The paragraph at the top of page 2-28 states that the BLM will "Develop additional and maintain existing water rights." We would appreciate more detail and specifics on this statement.</p>	<p>The Bureau has need for water rights for present and future use. These may include livestock, wildlife, public use, or conservation.</p> <p>Table 2.1.17 (Soil and Water Resources) of the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives has been revised to clarify the statement as follows:</p> <p>"BLM implements multiple types of water uses on public lands that require water rights from the State of Utah, such as livestock watering, wildlife watering and habitat, wild horse watering, recreation facilities, and fire suppression. BLM will continue to implement actions to maintain its current water rights for these purposes, such as filing proofs of beneficial use, filing diligence claims, changing existing water rights to fit new uses and projects, and filing protests as necessary to protect existing BLM water rights. BLM will also file for new water</p>	X

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				rights in accordance with and when allowed under state water law procedures. Situations in which BLM will file for new water rights include locations where existing water rights are insufficient or not in place to support the water use, or when existing water rights cannot be changed to support the water use on public land. “	
State of Utah	G-1	SW21	Need enhanced management direction for vegetative resources and watershed values. Lands should be managed to: a) control soil erosion to prevent the soil erosion rate from exceeding the tolerable (T) rate as determined through USDA/NRCS; b) control runoff loading of dissolved or suspended pollutants; c) enhance management direction for the inventory and protection of riparian areas in accordance with current BLM policy; and d) establish standards for riparian management including: i) width of riparian vegetated buffers which may vary with perennial or intermittent streamflow, cubic feet per second of streamflow, and with adjacent topography; ii) minimum ground cover percentage; iii) recommended standards for summer stream shading, though these will vary with site orientation of the stream and adjacent topography; iv) recommended native vegetative species and varieties to encourage in riparian areas; v) listing of noxious weeds and invasive species and varieties to reduce or exclude from range, forest, or riparian lands; vi) appropriate consideration for water quality concerns related to activities on public lands, including but not limited to, the requirements mandated by the Clean Water Act and the state water classifications in the 303D state water inventories, as well as at-risk water quality due to naturally occurring formations; vii) appropriate conservation or restoration of at-risk watersheds; viii) appropriate management of numerous	<p>The BLM's approach to land management through the RMP is consistent with the general outline provided in the comment.</p> <p>The tables in Chapter 2 of THE PRMP/FEIS outline the BLM's goals, objectives, and management actions common to all alternatives for the resources described in the comment. The reader will find that these goals, objectives, and actions are consistent with the spirit of the comment, if not the specific details.</p>	

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			special status vegetative species in order to prevent additional listings of populations; ix) appropriate management of numerous special status vegetative species and their suitable habitats in order to protect, restore, and/or recover those species or varieties; and x) promoting the provisions of the Safe Drinking Water Act, the Unified Federal Policy for a Watershed Approach, and the Colorado River Basis Salinity Control Act.		
Bureau of Indian Affairs	G-2	SW1	Recent increases in oil and gas development in the Uintah Basin are likely to have effects on soil stability, soil productivity, water quality and water supply in addition to the oil and gas surface disturbances listed in Tables 4-1 to 4-4. These [additional impacts] are not addressed well in the draft document in the affected environment, effects or the cumulative effects sections. To adequately compare alternatives, a quantification of total existing and projected surface disturbance (in acres, square miles, etc.) not just those from oil and gas developments should be included.	Oil and gas is the predominant surface disturbing activity within the planning area. While there may be other proposed actions that involve surface disturbance, it is unlikely that the incremental impact of these activities would significantly contribute to the overall impact.	
Bureau of Indian Affairs	G-2	SW2	Water quantity use/appropriation (in acre-feet or similar measurement), and water quality tolerances/limits should be provided in the EIS.	Water quality tolerances/limits are established by the Utah DEQ and the EPA and are incorporated by reference. It is not necessary for the BLM to include in the RMP exhaustive recitation of all laws, policies, and guidelines applicable to proposed management decisions if those documents are readily available elsewhere, as are the standards for water quality. It is also unnecessary to discuss specific water quantity use/appropriation in order to compare proposed alternatives.	
U.S. Fish and Wildlife Service	G-12	SW34 (JSW-5)	Impacts from selenium on soil, water, fish, and wildlife should be discussed in each section and in Cumulative Impacts.	See comment response SW36.	
U.S. Fish and	G-12	SW35	RMP/EIS should have discussion of cautions in	See comment response SW36.	

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Wildlife Service		(JSW-6)	developing surface water supplies on seleniferous soils and selenium –bearing formations, which could have adverse impact on fish and migratory birds.		
U.S. Fish and Wildlife Service	G-12	SW36 (JSW-7)	An analysis of selenium impact on fish and wildlife from mineral and energy resource decisions should be in RMP, rather than at project specific phase. It can be discussed on a watershed level: because the RMP will identify those areas open for mineral leasing and with what stipulations, and because those selenium bearing formations have been identified, the RMP can and should identify those watersheds where stipulations specific to selenium mobilization should be in place.	<p>The impacts of selenium on fish and wildlife are not needed at the programmatic-level of analysis for the RMP.</p> <p>Selenium impacts are reviewed and mitigated at the site-specific phase of any project proposal. The cumulative impacts would be disclosed at that time.</p> <p>Geologic mapping is reviewed during project proposals by interdisciplinary specialists including soil and water specialists to determine if selenium bearing soil or rock formations are being disturbed.</p>	
U.S. Fish and Wildlife Service	G-12	SW37 (JSW-8)	Restrictions should be placed on construction on slopes >20% in areas identified with selenium rich soils. Areas of selenium–rich soils should also have restrictions on road construction and well pad numbers.	Under Alternatives A, B, C, and E, surface disturbing activities on slopes greater than 21% but less than 40%, regardless of soil type or content, require an approved development plan the includes an erosion control strategy. Additionally, surface disturbance on slopes greater than 40%, regardless of soil type or content, would not be allowed under these alternatives.	
U.S. Fish and Wildlife Service	G-12	SW38 (JSW-9)	Pipeline crossings through ephemeral, intermittent, or perennial drainages have potential to affect the four endangered Colorado River fish as well as other fish and wildlife resources. We support the use of hydraulic analysis and the Guidance for Pipeline Crossings in the planning phase. We recommend that including this commitment as an "Action Common to All Alternatives" (rather than a Goal) under Mineral and Energy Resources or Soil and Water Resources is more appropriate and will ensure its use.	Although not a stipulation or condition of approval Appendix B; Hydraulic Considerations for Pipeline Crossings of Stream Channels provides the formal guidelines during onsite surveys of by natural resource specialists to minimize impacts to drainages by pipeline crossings.	

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U.S. Fish and Wildlife Service	G-12	SW39 (JSW-10)	<p>The document states that there are no data for biological soil crusts within the VPA. However, the presence of biological soil crusts has been documented. A 1974 document (Johansen) by a student of Dr. Sam Rushforth, then of Brigham Young University (BYU), surveyed algae of both surface waters and soils of the Federal Oil Shale Lease Areas of Uintah County. It was intended to serve as a baseline study of the area because there were concerns at that time regarding the potential effects of oil shale processing. The document makes note of the presence of biological soil crusts at that time. Dr. Larry St. Clair of BYU has several soil microbial crust monitoring sites in the Vernal area that are part of a National Science Foundation-funded project.</p> <p>We recommend the RMP incorporate the US Department of Interior (USDI) Technical Reference 1730-2, Biological Soil Crusts: Ecology and Management (BLM 2001) as "Management Common to All Alternatives." With the existing baselines, a management program for biological soil crusts should be developed and implemented to determine land use impacts and stabilize soils.</p>	Information from the referenced biological soil crust research project was reviewed subsequent to the receipt of this comment and was incorporated into Section 3.13.3.2.1.	
U.S. Fish and Wildlife Service	G-12	SW40 (JSW-11)	This section should include selenium bearing and boron bearing soils in this category, either as a separate discussion, or within the Salinity discussion. The document states, "Impacts are to be minimized in areas with saline soils, and revegetation of previously disturbed saline soils is to be promoted to the extent possible." The RMP should provide guidance on salinity thresholds and management direction if/when these thresholds are exceeded. We recommend you adopt more stringent minimization standards that may	See comment responses SW31 and SW33.	

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			include avoidance of surface disturbance in these areas.		
U.S. Fish and Wildlife Service	G-12	SW41 (JSW-12)	The document states that water quality would be impacted due to rises in salinity, sediment load, and increases in Selenium and Boron concentrations. We agree with that statement, but believe the mitigation provided in the document is inadequate.	Mitigation measures for impacts on soil and water resources are outlined in Section 4.13.3. Additional mitigation measures would be developed in collaboration with the appropriate state and federal agencies with regulatory authority over water quality. Natural resource specialists along with interdisciplinary analysis prior to authorization conduct analysis for water and soil impacts.	
U.S. Fish and Wildlife Service	G-12	SW42 (JSW-13)	Any proposed development of phosphate resources should include research and sampling to determine if co-located sources of selenium or uranium are present and could be released into the environment. BLM should require an exit strategy, adequate mitigation and a commitment to compliance resources in order to address these concerns.	Comment noted.	
USFS—Ashley National Forest	G-19	SW10	Please clarify which “soil and water management decisions” are referenced. If this relates to decisions for actions specifically to improve soil/watershed conditions, then statements may be accurate. However, improvement projects may do no detectable benefit to streams given the negative effects to soil and water resources identified under riparian, grazing, and minerals management. It is good that further site-specific analysis is indicated. Destruction of soil crust areas has been previously acknowledged related to livestock grazing (4.13.1.3) and would also likely occur with mineral development.	The management decisions referenced in the statement referred to in the comment are specific to those made solely for soil and water and their impact on soils and water under all alternatives. Reading all of Section 4.13 (Soil and Water Resources) of the PRMP/FEIS provide clarity to the question.	
USFS—Ashley National Forest	G-19	SW11	In the RMP, development of erodible soils on 21-40% slopes is allowed with an erosion control plan. Preferably, an erosion control plan should be required on every proposal – especially those with erodible soils, even if on slopes <20%. This is validated at the	Although an erosion control plan is required on slopes from 21-40%, BLM may require erosion control plans for any proposal, if site-specific analysis indicates a need.	

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			<p>bottom of p. 4-185 which acknowledges that slopes <20% would likely experience more soil loss than erodible soils—even without the consideration of road densities. In that case 21-40% slopes (especially those with erodible soils) may need additional protection, such as NSO or other limiting features unless demonstrable lack of adverse effect to water quality, riparian, and soil resources other than pad/road areas taken out of production (irreversible consequences per CEQ). This would be consistent with the Forest Service’s Western Uinta Basin Oil and Gas Leasing Record of Decision (1997) which includes NSO for Geologic Hazards and Unstable Soils, Slopes >35%. Since erodible soils are also often saline soils, there is a risk that water quality - including salinity – would deteriorate. In some areas, water quality is already impaired and not supporting beneficial uses per the Clean Water Act 303(d) list for State of Utah. Section 4.13.2.4 on page 4-189 and Table 4.13.2 on pages 4-190/191 affirms concerns from mineral activity on slopes 0-20%. It also raises a concern that Monument Butte-Red Wash RFD area has the greatest erodible soils and also the greatest number of potential wells; please address this risk. Even though some may not be on BLM land, the watershed and water bodies are still at risk if adequate protection is not provided.</p>		
USFS—Ashley National Forest	G-19	SW12	<p>The ability of the utilization percentages specified (50% or 60%) to achieve the goals claimed depends on condition of the lands and season in which the vegetation is used. If all rangelands were in high ecological condition, then these might be good UPLAND goals (noting separate riparian recommendations above). However, page 3-36 identifies that 70% of the allotments are in categories of “improve” or “custodial” care (the latter including areas</p>	<p>The general utilization levels are based on an allotment that does not have a management plan specifying specific settings of use levels. When an allotment, through an evaluation by utilization monitoring or Range Land Health Assessments, determines the need of a different use level to meet the objectives, then the use levels will change.</p>	

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			of low productivity). Therefore, the utilization percentages identified may be inadequate to promote quality watershed conditions (soil, water, vegetation) on those allotments in “I” and “C” categories. On the Ashley National Forests, it has been demonstrated through long-term monitoring (10 years or more) that riparian areas on shale-derived soils recover very slowly, even with complete rest (Sherel Goodrich studies in Red Pine Shale, e.g., studies 38-2C, 38-3R1, 40-3A)		
USFS— Ashley National Forest	G-19	SW13	The discussion of alternatives on pages 4-192/193 identifies the extent of disturbance; please also address resource effects such as: water quality effects including to salinity and 303(d) listed water bodies that could be further impaired irreversible consequences through loss of soil or soil productivity increased sediment and lowered watershed integrity could affect watershed conditions including riparian or wetland resources.	Potential water quality effects, soil productivity loss, and increased sedimentation and impacts on watersheds are addressed under the impacts common to all alternatives sections of the soil and water chapter. Please, see Sections 4.13.1 through 4.13.1.15. Irreversible consequences through loss of soil productivity and sedimentation are also acknowledged in Section 4.13.6 of the PRMP/FEIS.	
USFS— Ashley National Forest	G-19	SW14	Please discuss resource effects and acknowledge the risks of land and water degradation.	The analysis of potential impacts for all resources are provided in Chapter 4. The analysis of potential impacts relative to soil and water is provided in Section 4.13.	
USFS— Ashley National Forest	G-19	SW15	Please acknowledge that some of the management actions could result in long-term increased erosion, water quality degradation, and watershed deterioration, particularly from the magnitude of mineral/oil/gas development. This is especially true in areas with erosive soils, high salinity, and lower vegetative conditions.	Potential long-term effects of management decisions on soil and water resources are acknowledged in Sections 4.13.1.1 through 4.13.1.15 for all alternatives, Sections 4.13.2 and its subsections by individual alternative, and Sections 4.13.5 and 4.13.6.	
USFS— Ashley	G-19	SW16	Please consider that loss of soil at roads, well pads, or eroded from activities (including minerals, livestock	See comment response SW9.	

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National Forest			grazing, recreation, or other uses) is not “reversible” with respect to surface water quality. Loss of topsoil and organic layers changes the soil profile for decades or centuries. Even with mitigation and revegetation efforts, the land productivity would not be equivalent to pre-disturbance conditions for a very long time. The soil would experience irreversible impacts – even without excessive erosion – from well pads, roads, and other activities which remove native topsoil along with its microorganisms. This applies equally to areas with and without biological soil crusts. Loss of soil productivity is part of the CEQ definition of irreversible impacts.		
USFS— Ashley National Forest	G-19	SW17	Since a risk to ground water resources has been identified here, please identify mitigation related to protection of ground water resources.	Most groundwater issues addressed during the site-specific well construction phase, as the requirements of Onshore Order No. 1 are applied to the well design at this time. The BLM also has authority over the plugging and abandoning of wells. The well-plugging design is partially based on the need to isolate and protect usable water and prevent it from mixing with non-usable water within the bore-hole.	
USFS— Ashley National Forest	G-19	SW43 (LSW-1)	If additional areas in Alternative C are needed for watershed/ecosystem health, clarify what consequences to their health would occur in Alternative A.	Potential environmental consequences from each proposed alternative are disclosed in Chapter 4 by resource and by resource management action. Within each section, the potential impacts of alternatives are compared to each other.	
USFS— Ashley National Forest	G-19	SW44 (LSW-2)	Since the RMP does not identify priority watersheds and does not consider all watershed influences regarding water quality, how does the citation of the Unified Federal Policy for a Watershed Approach to Federal Land assure protection?	Priority watersheds would be identified in collaboration with the state, counties, Tribes, and Division of Water Rights as part of developing watershed protection and enhancement plans under all alternatives (see Table 2.1.17 (Soil and Water Resources) of the PRMP/FEIS under the subsection entitled Management Actions Common to All	

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				Alternatives.	
USFS— Ashley National Forest	G-19	SW45 (LSW-3)	What soil and water protection is provided in other uses than oil and gas? Are the Utah Non-point Source Plan Appendices included?	<p>Management actions that afford protection to soil and water resources can be found under most resource and land use programs in the tables located in Chapter 2. In particular, see the sections on livestock grazing, recreation, and riparian resources.</p> <p>The Utah Non-Point Source Plan Appendices are not included in the RMP. They are incorporated by reference. Many of the appendices, as well as the body of the plan, are available from the Utah Division of Water Quality website found at http://www.waterquality.utah.gov/documents/NPSplan.html. A complete paper set of the appendices can be requested via this website.</p>	
USFS— Ashley National Forest	G-19	SW46 (LSW-4)	Please acknowledge the Clean Water Act sections 303(d) and 305(d) in Water Quality	The Clean Water Act and BLM's compliance with it are cited in Table 2.1.1 (Management Common to All Alternatives) of the PRMP/FEIS.	
USFS— Ashley National Forest	G-19	SW47 (LSW-5)	Mention the directives for floodplains under EO 11988.	Executive Order No. 11988; Floodplain Management; May 24, 1977 has been added to the References in the PRMP/FEIS.	X
USFS— Ashley National Forest	G-19	SW48 (LSW-6)	Include a discussion of groundwater resources and effects to them from oil development, grazing, and recreation.	Groundwater resources in the Vernal Planning Area are described in Section 3.13.4.2 of the PRMP/FEIS. Potential impacts on them are disclosed in Section 4.13 and its subsections.	
USFS— Ashley National Forest	G-19	SW49 (LSW-7)	Clarify how the aquifers described in the RMP mesh with those mapped by the USGS and Ashley NF.	Information has been added to Section 3.13.4.2 denoting the relationship between the aquifers described in the RMP and those mapped by the USGS and Ashley National Forest to the extent that such information is available.	X

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USFS— Ashley National Forest	G-19	SW50 (LSW-8)	Discuss what surface water effects could occur from ground water withdrawals?	Section 4.11.1 acknowledges surface water effects from groundwater withdrawals relative to riparian areas.	
USFS— Ashley National Forest	G-19	SW51 (LSW-9)	Include a discussion of the present regulatory legislation for ground water including: Safe Drinking Water Act 1974, Resource Conservation and Recovery Act of 1976, Comprehensive Environmental Response, Compensation, and Liability Act of 1980, and the National Oil and Hazardous Substances Pollution Contingency Plan	Comment noted.	
USFS— Ashley National Forest	G-19	SW52 (LSW-10)	Mention the TDML assessment on the lower Ashley Creek that is pending approval to demonstrate that an effort toward remediation has begun.	The BLM does not believe that such a demonstration is necessary and would become quickly outdated in an RMP intended to serve for 15 to 20 years.	
USFS— Ashley National Forest	G-19	SW53 (LSW-11)	Include additional laws and regulations relating to water quality such as State of Utah Water Quality Standards and other laws and treaties with Mexico regarding Colorado River Basin salinity.	Adherence with Utah Division of Water Quality and EPA standards as well as the Colorado River Basin Salinity Act is acknowledged in Table 2.1.17 (Soil and Water Resources) of the PRMP under the subsection entitled Management Common to All Action Alternatives. See comment response SW51.	
USFS— Ashley National Forest	G-19	SW54 (LSW-12)	Include stipulations for groundwater protection, such as casing requirements.	Stipulations are management actions that apply to leases rather than specific exploration and development activities. Since the potential for groundwater intrusion does not exist across all areas within a lease, broad stipulations for casing or other groundwater protection would be inappropriate and unnecessary. However, the BLM reviews the geological condition, presence/absence of groundwater/aquifer sources, etc. for every application to drill (APD) on a case-by-case basis. If	

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				the BLM determines that a risk exists for an individual drilling activity to impact a groundwater source, conditions of approval are applied to that APD that require protections such as casing, cement lining, or other techniques for isolating the groundwater from the bore site.	
USFS— Ashley National Forest	G-19	SW55 (LSW-13)	Adverse effects to riparian areas would be a violation of EOs 11988 and 11990 and the No Net Loss of wetlands provisions for federal agencies. Cite references to support the grazing benefits.	Executive Order 11988 is specific to floodplains, which are not necessarily synonymous with wetlands. Executive Order 11990 is specific to the protection of wetlands. The commenter does not identify how allowing adverse impacts to riparian areas would be a violation of these EOs. Riparian areas are not the same as wetlands or floodplains. Riparian areas are managed in accordance with the BLM's national policy on riparian management. The provisions for riparian area management are outlined in Table 2.1.16 (Riparian Resources) of the PRMP/FEIS.	
USFS— Ashley National Forest	G-19	SW56 (LSW-14) ME- TempA (LSW-14) in BLM 10-08 table	If “reclamation and restoration” of minerals/energy sites upon abandonment results in “less stream sedimentation” then is stream sedimentation occurring during operation of these sites?	Stream sedimentation is not occurring at these sites as conditions of approval on permits where sedimentation is possible require that measures be put in place to control the runoff of sediments into adjacent streams.	
USFS— Ashley National Forest	G-19	SW57 (LSW-15)	If all alternatives result in impacts to soil, they may be in violation of Colorado River quality laws and Clean Water Act.	Impacts to soils do not necessarily equate with water quality reductions. The RMP commits to adherence with the Clean Water Act, the Colorado River Basin Salinity Act, Utah Division of Water Quality, and EPA regulations for water quality within the Vernal Planning Area and includes stipulations	

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				under Alternatives A, B, C, and E to reduce the potential impact of soil erosion on water sources by placing restrictions on development on steep slopes in areas of erodible soils and within 100 meters of riparian areas (see Table 2.1.16 (Riparian Resources) and Table 2.1.17 (Soil and Water Resources) of the PRMP/FEIS.	
USFS— Ashley National Forest	G-19	SW9	Please note that soil productivity loss is an irreversible consequence per CEQ regulations.	Section 4.13.6 of the PRMP/FEIS states: "Soil is a finite resource, and soil productivity would experience irreversible impacts if excessive erosion were to occur without mitigative control structures or practices. These irreversible impacts would be applicable to all activities described above."	
UBAOG	G-22	SW4	Strike the 1st sentence. Replace with "Current management direction is inadequate or lacking in opportunities to enhance the management of Watershed Values and Vegetation Resources. BLM did not implement planned range projects authorized in prior plans".	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 or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
UBAOG	G-22	SW5	All material into water is considered a pollutant. The statement in the RMP makes no sense. It is not possible to "eliminate" all pollutants.	The term "pollutant" is used here in its common form meaning undesirable materials or substances that are generally man-made. The BLM finds that no change to the document is necessary to clarify this	

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				statement.	
UBAOG	G-22	SW6	Strike Paragraphs 1, 2 & 3. This discussion makes no sense and cannot be properly implemented. It also fails to recognize the scientific controversy regarding "crypto biotic" crusts or "Shepherds soils" and the role of various land uses on the soils. For example, if sheep or cattle hooves have adverse effects, then elk and wild horses, as well as deer and antelope will have equally significant if not more effects. The RMP assumes that only livestock have adverse effects. The DEIS RMP fails to identify where these crusts exist, what management prescriptions would apply and analyze and disclose impacts to other resources.	<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>	
UBAOG	G-22	SW6A	As written this section is inconsistent with Uintah County Plan regarding microbotic crusts.	<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</p>	

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				<p>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 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.</p>	
UBAOG	G-22	SW7	The allocation of upland forage assumes that only livestock affect soil and water resources. This is inaccurate. Wild horses have greater adverse impacts and big game through numbers and duration and	Table 2.1.17 (Soil and Water Resources) of the PRMP/FEIS accounts for the impacts of wild horses on soil and water resources under all alternatives. Section 4.13.1.14 accounts for impacts of wildlife on	

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			uncontrolled grazing will also have measurable and potentially adverse impacts.	soil and water resources under all alternatives. The impacts of wildlife on soil and water resources are accounted for by alternative in Section 4.13.2.13.	
UBAOG	G-22	SW8	This section fails to mention the potential long-term, adverse impacts [on soils and water] of failing to allow woodland and forest species salvage, under Alternative C, associated with catastrophic wildfire.	Catastrophic wildfire is possible under all alternatives.	
Ute Tribe of the Uintah and Ouray Reservation	G-26	SW18	The Ute Tribe is concerned about the impacts of surface disturbance to soil and water quality, since these disturbances would likely affect the water quality on Tribal lands near disturbed areas. We are especially concerned about water quality degradation to Hill Creek from soil erosion and potential contamination of the stream with chemicals. Therefore, the Tribe recommends that the following stipulation be included in the RMP/EIS: No surface occupancy shall be allowed in areas adjacent to Hill Creek.	The area around Hill Creek is designated for Controlled Surface Use under Alternatives A, B, C, and E. Stipulations are in place (see Table 2.1.16 (Riparian Resources) under the subsection entitled Management Common to All Action Alternatives that prohibit surface disturbance within 100 meters of riparian areas, with exceptions for the following situations: a) there are no practical alternatives; b) the impacts are fully mitigated; or c) the proposed action is designed to enhance riparian resources. BLM agrees with your concerns related to water quality impacts to Hill Creek. The BLM-administered lands are subject to the riparian policy stated in Table 2.1.16.	
Walter Merschhat	I-21	SW22 (SW-A)	The DRMP and DEIS needs to further study Coal Bed Methane water issues	Coal Bed Methane water issues will be studied and analyzed in NEPA documents prepared at the field development-level and project-level stages, when the exact location and nature of the proposed development is known and the impacts can be quantified.	
Walter Merschhat	I-21	SW23 (SW-B)	If the BLM were to consider down-hole injection/reinjection as one possible way to treat or dispose of CBM produced water, a comprehensive study must be undertaken to protect existing aquifers from degradation due to cross contamination from a disposal well.	Down-hole injection or re-injection of waters produced as a result of Coal Bed Methane development or any other minerals and energy development is under general consideration as a means of disposing of wastewater; however, no specific management actions stipulating such a process are proposed in the RMP. The	

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				environmental effects of injection or re-injection of wastewater will be analyzed at the field development or project-specific level when the details of such proposed actions are known.	
Walter Merschat	I-21	SW24 (SW-C)	The BLM must take a critical review of how CBM dewatering operations can affect the natural springs in the planning area.	Analysis of the potential impacts of CBM dewatering on water resources will be analyzed at the field development or project-specific level when the details of such proposed actions are known.	
Walter Merschat	I-21	SW25 (SW-D)	In a similar situation as springs, wells (domestic, industrial, municipal or others) completed in or above the coal can feel the effect of CBM dewatering and either experience a lowering of a water head or go completely dry. The potential for similar losses of water in this area is high with CBM operations and deserves further investigation by the BLM	See comment responses SW23 and SW24.	
Walter Merschat	I-21	SW26 (SW-E)	The BLM must take a serious look at the effects of CBM on aquifer recharge.	See comment response SW23 and SW24.	
T.R. Davis	I-136	SW27 (SW-F)	In the Soils/Water section, the RMP fails to even consider managing the public lands on a watershed basis. The document notes that the planning has been mapped by hydrologic units at the fifth and sixth level. It seems like this is the time to start managing watersheds based on the fifth level of delineation.	The BLM has included watershed-based actions in Management Common to All alternatives. See Table 2.1.17 (Soils and Water Resources) of the PRMP/FEIS.	
Laird Fetzer Hamblin	I-169	SW33 (JSW-4)	The EIS recognizes importance of biological soil crusts and identifies that no current data exists on the VPA for soil crusts. It is critical that BLM immediately initiate such studies and take the necessary action for protect biological soil crust. All actions causing soil disturbance on the VPA must be carefully considered and limited to necessary actions. Disturbances to saline soil must also be avoided to keep them from contaminating the surrounding watershed.	Table 2.1.17 (Soil and Water Resources) of the PRMP/FEIS outlines management actions common to all alternatives relative to biological soil crusts. Specific plans to avoid, minimize, or mitigate the potential impacts of land use on watersheds in areas where saline soils and biological soil crusts are present will be developed at the project-level stage, when details related to the precise location and nature of a proposed undertaking are known.	

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				See comment response SW39.	
Laird Fetzer Hamblin	I-171	SW32 (JSW-3)	4 streams (Pariette Draw, Nine Mile Creek, Willow Creek, Ashley Creek) in or adjacent to the VPA are listed as water quality limited in DWQ 2002 River and Stream Analysis. Also Cliff Creek has very high selenium content and is in a very degrade condition due to livestock use. These streams and the adjacent BLM lands needs to e evaluated and action taken to return them to a pristine condition.	See comment response SW31.	
Newfield Exploration Co.	O-4	SW3	The EIS does not demonstrate that there is sufficient risk to soil and water resources from pipeline crossings to justify the cost associated with requiring the proponent to conduct a hydraulic analysis for every pipeline crossing of intermittent and ephemeral stream channels. The methodology outlined in Appendix B Hydraulic Considerations for Pipeline Crossings of Stream Channels is difficult to interpret and would be extremely difficult to implement for every pipeline crossing.	The reference to conducting hydraulic analysis for pipeline crossings of intermittent and ephemeral stream channels is included in Table 2.1.17 (Soil and Water Resources) of the PRMP/FEIS under the subsection entitled Goals and Objectives. As the section heading indicates, the items listed under it are goals, not stipulations or requirements. The BLM would be available to assist as needed in the interpretation and implementation of the methods outlined in Appendix B. Most of this can be determined during onsite surveys with the operator and the Natural Resource Specialist of the BLM.	
Utah Farm Bureau Federation	O-9	SW8	This section fails to mention the potential long-term, adverse impacts [on soils and water] of failing to allow woodland and forest species salvage, under Alternative C, associated with catastrophic wildfire.	Catastrophic wildfire is possible under all alternatives.	
Newfield Exploration Co.	O-13	SW28 (SW-G)	The EIS does not demonstrate that there is sufficient risk to soil and water resources from pipeline crossings to justify the cost associated with requiring the proponent to conduct a hydraulic analysis for every pipeline crossing of intermittent and ephemeral stream channels. The methodology outlined in Appendix B Hydraulic Considerations for Pipeline Crossings of Stream Channels is difficult to interpret and would be extremely difficult to implement for every pipeline	See comment response SW3.	

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			crossing.		
Trout Unlimited	O-27	SW29 (SW-H)	We request that all CBM produced wastewater be disposed of using reinjection techniques that in turn aid in aquifer recharging.	See comment response SW23.	
Vermillion Ranch Limited Partnership	O-33	SW58 (R-SW1)	<p>Add the bolded statement where indicated:</p> <p>“Eliminate or reduce discharge of pollutants into surface waters and achieve water quality that provides protection and propagation of fish, amphibians, wildlife, livestock, and recreation in and on the water. Implement best management practices adopted by Utah Division of Environmental Quality (“DEQ”) to limit surface discharges into water.”</p> <p>The Utah DEQ has jurisdiction over water quality, both point and non-point sources of water pollution. BLM’s only regulatory option is to implement the “best management practices” for non-point sources, which are designed to reduce sedimentation and erosion into streams.</p>	The suggested wording has been added to Table 2.1.17 ((Soil and Water Resources) in order to clarify that the BLM acknowledges the authority of and adheres to the regulations of the DEQ (and the EPA) under all alternatives.	X
Vermillion Ranch Limited Partnership	O-33	SW59 (R-SW2) (R-SW16)	The section is biased and inaccurate and should be deleted. This discussion fails to recognize the scientific controversy regarding “crypto biotic” crusts or “Shepherds soils” and the role of various land uses on the soils. For example, if sheep or cattle hooves have adverse effects, then elk and wild horses, as well as deer and antelope, will have equally significant, if not greater, adverse effects. The RMP assumes incorrectly that only livestock have adverse effects.	The BLM declines to delete the section as suggested. The section does not single out livestock grazing as the sole potential source of impacts to biological soil crusts but includes other land uses as well.	
Vermillion Ranch	O-33	SW60 (R-SW3)	[T]he RMP does not address the effects of mountain biking or concentrated recreation uses on soil and	The RMP does not claim to permanently remove valid existing rights for livestock grazing in order to	

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Limited Partnership			water resources. The selective blame-shifting in the RMP only supports charges that soil crust issue is a device to remove livestock grazing or obstruct development, rather than a legitimate scientific issue.	protect soil and water resources. Rather, alternatives under the RMP provide for flexible management of that grazing to adapt to environmental conditions and overall management objectives, which include maintaining rangeland health. The potential impacts of recreation management actions proposed under the alternatives are outlined in Section 4.13.1.6.	
Vermillion Ranch Limited Partnership	O-33	SW61 (R-SW4)	<p>Revise the statement as follows: "Establish new and maintain all existing guzzlers and other water sources to improve forage and habitat for all grazing animals and distribution in the planning area."</p> <p>Water projects should not be limited to just wildlife but should be supported for all grazing species.</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>	
Vermillion Ranch Limited Partnership	O-33	SW62 (R-SW5)	<p>-Alternative A</p> <p>As is the case with the riparian area discussion, the allocation of upland forage assumes that only livestock affect soil and water resources. This is inaccurate. Wild horses have greater adverse impacts and big game through numbers and duration will also have measurable and potentially adverse impacts.</p> <p>-Alternative D</p> <p>The RMP cannot say that the current direction will have the greatest adverse impacts. Forage utilization is set</p>	<p>See comment response SW7.</p> <p>All other things being equal across alternatives, alternatives wherein higher numbers of AUMs are allocated, and presumably used, would have a greater potential impact on soil and water resources are greater numbers of animals have the potential for more trampling than smaller numbers of animals. The same table to which this comment refers (Table 2.5, page 2-96 of the DEIS) also acknowledges the</p>	

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			out in individual allotment grazing plans and monitored.	several situations in which Alternative D has fewer potential impacts than other alternatives. Note: Table 2.5 of the Draft RMP has been renumbered as Table 2.2 in the PRMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	SW63 (R-SW6)	-Alternative A [Soils and Water Resources] The acreage figures are not explained. It is unclear whether they refer to vegetation treatments or include acres affected by fences, water projects, and other structures.	Table 2.5 (to which the comment is directed) is a summary of impacts from alternative management prescriptions outlined in Table 2.3 and analyzed in Chapter 4. Note: Table 2.5 of the Draft RMP has been renumbered as Table 2.2 in the PRMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	SW64 (R-SW7)	Any CBM water disposal is governed by Utah DEQ. The other effects are accidental spills or unlawful actions that presumably are prevented through enforcement procedures. Disposal by definition is not accidental.	Section 4.7.2.3.2 does not claim that disposal is accidental as suggested by the comment. The statement in this section merely refers to disposal as a potential source of additional unquantified adverse impacts. However, the reference to accidental spills has been removed from the text, as accidental spills are tied to unplanned actions.	X
Vermillion Ranch Limited Partnership	O-33	SW65 (R-SW8)	Modify the following statement as indicated by bolded additions and strikethrough deletions: "The effects of recreation decisions on soils may would generally be long-term, indirect, and beneficial for specific areas by limiting OHV use to designated areas and by providing management for areas as SRMAs. Adverse effects would occur from increased visitor traffic, development of trails, and OHV use. Adverse impacts would include trampling of banks, compaction of soils, and spread of noxious weeds. Where limits are place on OHV travel off of designated routes for big game retrieval, beneficial effects may would occur.	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 or preferences.	

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			<p>The "Tread Lightly" program is invaluable in educating OHV users to stay on existing trails, thereby decreasing impacts to riparian areas. "Sacrifice" areas would be designated for OHV users in areas that are not ecologically sensitive and present little or no risk to riparian condition and other components identified in the Utah BLM Standards for Rangeland Health."</p> <p>The statement is only true if applied to specific areas. Recreation use, especially bikes or ATVs will increase soil disturbance and erosion.</p>	<p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p> <p>The BLM does not find the suggested changes necessary or appropriate. The statement as written is a landscape level analysis that takes into account the entirety of the Vernal Planning Area. Further, it is not an overstatement to say that as a rule, restriction of OHV travel to designated routes would benefit soils located outside of those routes by subjecting them to fewer direct impacts.</p>	
Vermillion Ranch Limited Partnership	O-33	SW66 (R-SW9)	VRM does not necessarily limit soil disturbance. The assumption in the RMP that it does suggests that the RMP fails to accurately disclose the full ramifications of the VRM Classes I and II. The RMP misuses this management tool	<p>The commenter is partially correct in that VRM Class I and II designation do not, in and of themselves, prevent soil disturbance. However, VRM Class I and II designation do place limits on how development can occur and does require efforts to reduce the overall geographic extent and ground disturbance of that development. By extension, this lesser ground disturbance would create a situation where the potential for soil disturbance is lower when compared to situations in which no such limits are in place.</p> <p>The commenter is correct. The management objectives of an area determine a VRM classification. Therefore it is not the VRM classification that may limit soil disturbance, but</p>	

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				rather the management objectives.	
Vermillion Ranch Limited Partnership	O-33	SW67 (R-SW10)	Increased recreation use will have significant effects on soil and water that are largely ignored in the DEIS. Trail use by recreationists can have significant and adverse impacts on soil and water quality.	<p>See Table 2.1.13 (Recreation Resources) of the PRMP/FEIS where the Rangeland Health Standard 2, states that:</p> <p>“1. Where feasible, and consistent with user safety, development travel routes should be located/relocated away from sensitive riparian and wetlands areas.</p> <p>2. Camping in riparian areas should be avoided and must be managed, monitored, and modified as conditions dictate to reduce vegetation disturbance and wetlands areas.</p> <p>3. Stream crossings would be limited to the number dictated by the topography, geology, and soil type. Design any necessary stream crossings to minimize sedimentation, soil erosion, and compaction.”</p>	
Vermillion Ranch Limited Partnership	O-33	SW68 (R-SW11)	Camping activities generally result in increased levels of bacteria in creeks and streams. The EIS must address these significant health risks. The trail system will also increase erosion and run off. This too is a direct consequence of opening this area to intense recreation.	See comment response SW67.	
Vermillion Ranch Limited Partnership	O-33	SW69 (R-SW12)	RE: Alternative A-- Recreation use will have significant adverse effects on soil and water, which are omitted. Thus the conversion of this area from multiple use to intense recreation use will have greater or as great adverse environmental impacts. This proposal should be dropped. There is limited justification, it contradicts BLM energy policy, and the environmental effects are potentially significant.	Potential impacts from recreation management decisions on soil and water resources are addressed in Section 4.13.2.6. There is no need to drop any proposal under any alternative in the RMP. The BLM must consider a reasonable range of alternatives that each meet the purpose and need of the RMP. Further, any one alternative assessed in the EIS need not be selected in its entirety in the Record of Decision (ROD). The ROD may include individual management options under any of the	

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				alternatives in the final suite of management actions that are to be included in the Final RMP.	
Vermillion Ranch Limited Partnership	O-33	SW70 (R-SW13)	Oil and gas and mining have limited water needs, other than reducing dust.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	SW71 (R-SW14)	-Clearcut logging affects surface water flows. Full Field development with sites being reclaimed is unlikely to affect surface water flows. -Oil and gas development does not dewater aquifers. Any tertiary pumping is approved by Utah Department of Environmental Quality.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	SW72 (R-SW15)	-The discussion omits private and state trust lands, which is significant omission. BLM's past history of delaying oil and gas development has resulted in much of the drilling occurring on the trust lands or private lands. -BLM best management practices should be disclosed and discussed.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	SW74 (R-SW6)	The special designations would not necessarily limit erosion, since they also limit management tools that would improve vegetation and reduce erosion. Heavy recreation use is equally likely to cause erosion and stream sedimentation.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	SW75 (VE53)	Modify the following statement as indicated by bolded additions and strikethrough deletions: "Designating new ACECs and expanding current ACECs would have long-term, direct and indirect, beneficial and harmful impacts to soils and water by protecting relevant and important values and limiting OHV travel to designated routes (although designation	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	

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			<p>would not preclude oil and gas development within these areas) but limiting management opportunities. Specific management guidelines would be created for each ACEC and would require further analysis of impacts to soils and water resources. Special designations of ACECs are reconsidered for would continue in Browns Park, Red Mountain-Dry Fork, Lears Canyon, Pariette Wetlands, and Red Creek Watershed; therefore, these designations will not be analyzed by individual alternative."</p> <p>ACEC designation for wildlife will not benefit soils, since both big game and wild horses have direct and indirect adverse effects on vegetation cover and soils. This discussion also illustrates the tunnel vision found in the DEIS, where wildlife are "good" and domestic livestock are "bad." Limiting OHV travel to specific routes will increase the impacts on particular areas. Similarly, limiting oil and gas development to certain areas and times of the year will also increase the impacts.</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/FEIS.</p> <p>Section 4.13.1.9 discusses ACECs in general terms and does not discuss establishing ACECs for wildlife, though wildlife may be one of many resource values considered in the proposed ACEC designation.</p> <p>The analysis is based on landscape-level considerations rather than site-specific considerations. Wild horse populations are limited within the planning area and would have only limited and localized impacts rather than landscape-level (planning area wide) impacts. The same is true for OHV use of designated routes and areas.</p>	
Center for Native Ecosystems	O-38	SW31 (JSW-2)	The soils and water resources goals have many positive aspects, including the explicit goal to reduce selenium loading, but the plan itself does not elucidate how this will be achieved.	As stated in the RMP, the BLM will work in collaboration with a variety of partners to develop specific plans for reducing selenium loading within the planning area. This collaboration is anticipated to be a long-term activity that will be refined over time and will take place subsequent to the implementation of the final RMP.	
Enduring Resources	O-40	SW30 (JSW-1)	DEIS says "pipeline crossing...should be constructed to withstand 100-year floods to prevent breakage and subsequent accidental contamination of runoff during	The use of pipelines that can withstand a 100-year flood is listed as a goal and not a stipulation or requirement. Further, the BLM makes every effort	

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			high flow events." The pipelines are already built to withstand floods and at what point do you stop over-engineering?	to accommodate multiple uses of public lands in balance with the potential environmental impacts from those uses. The BLM can allow uses with potential adverse environmental impacts so long as measures are taken to avoid, minimize, or mitigate those impacts. The BLM believes that establishing a goal that pipelines be able to withstand a 100-year flood event is a reasonable avoidance and minimization measure.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SW	Retention of topsoil for reclamation purposes is important because availability of mycorrhizal propagules in soil used for reclamation can influence the success of sagebrush reestablishment (Lyford 1995). Top soil should be reserved during every surface-disturbing activity, so that it can be replaced during the reclamation process.	The comment is a standard practice for surface disturbing operations within the planning area and not something that needs to be stated in the RMP.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	SW73 (NVE2)	ORVs can have disastrous effects on cryptobiotic crusts which are rapidly being depleted across rangelands today.	BLM recognizes the impacts vehicular travel can have on biological soil crusts and considered this in the decision to implement management actions restricting OHV travel to designated routes under Alternatives A, B, and C.	

Travel Management

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State of Utah	G-1	TR16	Travel alternatives are discussed on page 2-62. The UDWR supports decommissioning and restoring newly permitted roads and trails following completion of permitted use.	Comment noted.	
Bureau of Indian Affairs	G-2	TR47 (JTR-11)	To avoid natural and cultural resource damage to Tribal lands, please review and reconsider the preferred alternative's "open" designation bordering the Uintah and Ouray Indian reservations near the White River.	Although the BLM has identified an "open" area with a portion directly adjacent to Tribal Lands, there are three factors that will minimize the opportunity for natural and cultural damage to Tribal lands: 1. According to the DEIS, any use beyond the "open" boundary would be restricted to designated routes, 2. Most users prefer to ride the tall and rounded Mancos shale ridges located at the heart of the "open" area located 2 miles to the east and 3. Tribal Lands are posted closed to all ATV use with federally enforced trespass laws.	
Duchesne County	G-9	TR1 (TR-N)	We request that the BLM articulate its policies regarding the granting of Title 5 rights of way to counties and provide a Title 5 right of way agreement template in an appendix of the RMP.	The request is beyond the scope of this document. Title V rights-of-way are clearly explained in FLPMA. It is not necessary to repeat that information in this document.	
Duchesne County	G-9	TR2	This item talks about the elimination of "unneeded travel routes." This item should be modified to indicate who makes such a determination.	Recreation management guidelines were developed to help achieve and maintain healthy public lands as defined by the Rangeland Health Standards. Refer to Table 2.1.13 (Recreation Resources) of the PRMP/FEIS under Rangeland Health Standard 1 for the Recreation Management Guidelines. The BLM will make the determination of unneeded travel routes in a Travel Management Plan which will be prepared after the Record of Decision. The public and the PRMP cooperating agencies will be involved in scoping for the plan.	

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Duchesne County	G-9	TR3	This item should be modified to indicate that determinations as to whether travel routes are "unneeded" would take into account county transportation plans and county comments.	See comment response TR2.	
Duchesne County	G-9	TR32 (TR-P)	Construction of new roads across riparian areas does not create an irreversible loss of habitat. If such roads are deemed to no longer serve a public purpose after the activity they serve is completed, such roads can be removed and the habitat restored.	Section 4.11.1 in the PRMP/FEIS has been revised to read as follows: "Depending upon the types of construction methods and materials used, roads built across riparian areas would result in a direct loss of riparian habitat at the site of the crossing. The loss of habitat would continue until the reclamation of the road occurs and traffic diminishes to a point that riparian habitat can reestablish itself."	X
Duchesne County	G-9	TR4	The RMP should include a discussion of BLM's policies regarding granting Title V rights-of-way.	See comment response TR1.	
Duchesne County	G-9	TR5	There are many roads on BLM land that are not officially "county roads," but are public (Class D) roads that have RS 2477 rights. Many of these appear on the Duchesne County Transportation Plan that has been provided to the BLM. Can the BLM recognize such rights in this part of the document?	A "D" route does not equate to a County road assertion. The routes identified as "D" routes in the DRMP/DEIS are roads located on public lands and managed by the BLM until properly adjudicated. The DRMP/DEIS proposes four different alternatives to manage these routes. As specified in the Draft RMP/DEIS Section 1.8 these issues are addressing RS 2477 assertions and are beyond the scope of this planning effort. However, nothing extinguishes any right-of-way or alters in any way the legal rights the State and Counties have to assert and protect RS 2477 rights. See comment response TR8.	
Duchesne	G-9	TR6	Duchesne County favors Alternative B. The county	Comment noted.	

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County			promotes the continued use of roads that serve a public interest. The county would like the ability to maintain and upgrade existing roads and propose realignments to address safety or environmental issues. The county recognizes the importance of Off Highway Vehicles to the economy of the area; however, the damage OHV use causes to the environment is of concern. We feel that Alternative B strikes an acceptable balance.		
Duchesne County	G-9	TR7	Closing or restricting access over public lands is mentioned in this paragraph. Duchesne County requests that this paragraph make it clear that such closures or restrictions would not effect roads shown on county transportation plans or roads with RS 2477 rights.	This clarification is provided for in Section 1.8, Issues Beyond the Scope of the PRMP/FEIS.	
UBAOG	G-22	TR10	<p>"Travel management would account for valid existing rights, and would incorporate the county and other public roads".</p> <p>Add this bullet to consider valid existing rights impacts to travel management (i.e., R.S. 2477).</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>	
UBAOG	G-22	TR11	Strike these alternatives. The road described here (Chipeta Canyon road) is a county claimed road to and beyond the cabin as well as other roads in the area. A proposal to close county claimed roads is	BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:	

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			<p>inappropriate. This alternative implies that the road beyond the cabin will be closed. The county views this as a county road. It would appear that to discuss open or closed roads in the RMP is premature given the RS2477 settlement. Due to the controversy over ownership of such roads, the plan should not imply ownership.</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>	
UBAOG	G-22	TR12	<p>What was once over 1,000,000 acres open to travel has been reduced to 4,306. There appears to be no documentation justifying this dramatic shift. There are acreages that appear to have dropped out of consideration. The County Plan provides that acres be open until there is a demonstrated and substantiated need.</p>	<p>By the "4th Alternative" the BLM presumes that the commenter means the 4th line of alternatives under the heading "Travel-Roads and Trails." The line of management actions allocates lands open and closed to OHV travel. Under Alternative D, approximately 1.6 million acres are open to some form of OHV travel, and no routes are designated. Under Alternatives A, B, and C, between 1.35 million (Alt. C) and 1.6 million acres of land and between 4,707 linear miles (Alt. C) and 4,861 linear miles (Alt. B) of routes would be designated for some form of OHV travel.</p>	
UBAOG	G-22	TR8	<p>Drop "construction" replace with "maintenance of roads".</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</p>	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>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>	
UBAOG	G-22	TR9	<p>Currently there are paved roads outside of the transportation/utility corridors and in all probability there are roads that are now located outside these corridors that are in need of being paved and will be in the near future. As written, this section implies that paved roads cannot exist outside of the corridor.</p>	<p>Table 2.1.7 (Lands and Realty Management) of the PRMP/FEIS under the subsection entitled Transportation/Utility Corridors:</p> <p>“Major linear ROWs meeting the above thresholds that are proposed outside of the designated corridors would require a plan amendment.”</p> <p>Therefore, roads can exist outside of the corridor after the approval of a plan amendment.</p>	
UBAOG	G-22	TR9A	<p>Rewrite this bullet to provide for such activity.</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>	
Ute Tribe of the Uintah	G-26	TR14	<p>No right-of-way may be granted across the lands of the Ute Tribe without its consent. 25 U.S.C. § 324; 25</p>	<p>The BLM acknowledges the Ute Tribe's jurisdictional authority and makes no claim in the RMP to the</p>	

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and Ouray Reservation			C.F.R. § 169.3. Furthermore, such rights-of-way and surface uses require payment of not less than the fair market value of the rights granted. 25 C.F.R. § 169.12. Payment of the fair market value for surface use is in addition to any payment or bond for potential damage to the surface.	contrary.	
Ute Tribe of the Uintah and Ouray Reservation	G-26	TR15	The Ute Tribe supports the restrictions on OHV use to exiting trails and other travel restrictions outlined for Alternatives A, B, and C (as compared to D) for areas adjacent to the Reservation, since it will substantially decrease the likelihood of trespassers on Tribal lands and also reduce the potential for damage to cultural resources of importance to the Tribe.	Comment noted.	
Ute Tribe of the Uintah and Ouray Reservation	G-26	TR69	The Ute Indian Tribe has implemented a Master Infrastructure Plan (MIP) to guide use and development of roads, pipelines, and other facilities in a portion of the RMP area known as the Hill Creek Extension. The Tribe is constructing or has constructed this infrastructure to accommodate foreseeable impacts and development in an effort to eliminate the need for producers to construct unnecessarily. The plan has been developed and implemented with strong consideration to the sensitive needs of wildlife, cultural and historic resources and other environmental concerns. A visual mitigation corridor is in place for the Hill Creek Canyon Corridor to maintain the pristine, recreational experience of the Tribal Members accessing the Towave Reservoir Recreation Area. It is the Tribe's expectation that our MIP will be incorporated into the RMP and that your agency will work with the Tribe to insure the integrity of the plan. Failure to set forth the key points of the Plan within the text of the RMP will render the document incomplete and inadequate.	The BLM will continue to work with the Tribe regarding surface development on split estate lands within the Hill Creek Extension. The BLM recognizes the authority of the Tribe with regards to surface rights and surface development within these lands, and the RMP would not negate this authority.	

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JP Lee	I-4	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
J. Justin Crabtree	I-9	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Mr. & Mrs. James L. Denison	I-12	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Donald Lintner	I-13	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Joanna Bettmann	I-34	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Mary Ann Lewis	I-35	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Joanna Bettmann	I-36	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Kath M. Anderson	I-37	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Steve Bremner	I-39	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	

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William Huggins	I-49	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Steven C. Hansen	I-52	TR19 (TR-C)	Routes such as the Sunnyside-Bruin Point route (Carbon Co) should be designated industrial route to the gas and oil fields on the West Tavaputs Plateau. The recent land swap between Hunt Consolidated Inc. and the State of Utah on the East Tavaputs Plateau would facilitate this route, and would also bring a much needed economic boost to the towns of East Carbon and Sunnyside in Carbon Co.	The travel route mentioned lies within Carbon County and within the BLM Price Field Office administrative boundaries.	
Candee Pearson	I-76	TR20 (TR-D)	The amount of roads for motorized use is appalling, 5,000 miles is way too much. What about non-motorized use?	Management decisions for recreation, which includes both motorized and non-motorized use, can be found in Table 2.1.13 (Recreation Resources) of the PRMP/FEIS. See comment response RE20.	
Jack A. Smith	I-78	TR21 (TR-E)	Unlike the BLM's proposals, the Greater Dinosaur/Book Cliffs Heritage Plan also offers a logical and reasonable travel management plan that will allow off-highway vehicle recreation while protecting important lands. This is a serious issue that needs to be addressed now and not at a later date.	See comment response AT1.	
Lo I and Won Yin	I-84	TR21 (TR-E)	Unlike the BLM's proposals, the Greater Dinosaur/Book Cliffs Heritage Plan also offers a logical and reasonable travel management plan that will allow off-highway vehicle recreation while protecting important lands. This is a serious issue that needs to be addressed now and not at a later date.	See comment response AT1.	
Peter	I-88	TR22	If at all possible, it would be best to restrict ATV usage to existing roads; and hopefully, restrict the number of	Comment noted.	

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Robinson		(TR-F)	roads present. I realize that this may be politically impossible, but if the issue is not raised it will never be discussed. I suggest that the construction of new roads be as limited as the situation permits. The same philosophy has already been used by BLM in the placement of energy ROWs (pipelines, powerlines).		
Neil O. Miller	I-119	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Justin Barnett	I-124	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Mary Moran	I-142	TR13	The thousands of miles of motorized routes in the Vernal Field Office's BLM lands are excessive and damaging. The conversion of mere tracks into designated routes just encourages off-roaders to blaze new routes. All of these routes cause damage to soils and vegetation, and usually replace native plants with non-native and often invasive ones. They also disturb species of wildlife sensitive to human intrusion. The BLM should work to close routes in any proposed wilderness lands. There will still be thousands of miles of routes even if these are closed.	Table 2.1.20 (Special Designations – Wilderness Study Areas) under the subsection entitled states that the goal will be to: “Manage WSAs as directed in the Interim Management Policy (IMP) For Lands Under Wilderness Review (H-8550-1) in a manner that does not impair their suitability for designation as wilderness.”	
Nancy Bostick	I-162	TR23 (TR-G)	Allow UDWR input on construction of all new roads.	UDWR, or any other interested party, is encouraged to submit comments on any NEPA document.	
Nancy Bostick	I-162	TR24 (TR-H)	Evaluate roads impacts on wildlife as part of adaptive management process. The chosen RMP must assess these impacts and devise ways to mitigate them.	The mitigation measures for all alternatives are presented in Section 4.15.3 (Special Status Species Mitigation Measures) and Section 4.19.4 (Wildlife and Fisheries Resources Mitigation Measures).	
Nancy Bostick	I-162	TR25 (TR-I)	Continue to collect wildlife distribution data to study our knowledge of impacts on wildlife.	Comment noted.	

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Nancy Bostick	I-162	TR26 (TR-J)	BLM needs a consistent approach to identifying roads for closure and reclamation. BLM should close roads that don't have specific ongoing purpose or those which provide redundant access.	BLM is committed to continue working with the counties on this purpose. See comment response TR17.	
Nancy Bostick	I-162	TR27 (TR-K)	BLM should identify roads that harm wildlife, or increase the likelihood of noncompliance with conservation mandates, then close, reroute or limit use to reduce their impacts.	Individual projects are analyzed in the NEPA process for potential impacts to resources within the Vernal Field Office. The RMP is used as a broad scale analysis to provide direction to management. New proposed activities, including roads, are currently analyzed for potential adverse affects on all resources, including wildlife.	
Nancy Bostick	I-162	TR28 (TR-L)	Plan for and implement staged development with regards to road construction and energy development.	Comment noted.	
Nancy Bostick	I-162	TR29 (TR-M)	Although the RMP has designated areas and routes for OHVs, the need for an extensive and detailed travel plan has never been more critical. OHV abuse has escalated to the detriment of most other recreational uses and traditional values like grazing, property rights, and non-motorized recreation such as hiking, horseback riding etc...	The BLM agrees that OHV use requires implementation of a management strategy to control impacts from this activity. To this end, Table 2.1.22 (Travel – Roads and Trails) of the PRMP/FEIS states that it's goal is to: “Establish working partnerships with local and state agencies, user groups, commercial providers, and other interested parties that would facilitate effective OHV program development including the planning for and implementation of successful trail systems and use areas. Provide areas for OHV and motorized use, while protecting other resource values.” Later in Table 2.1.22 under the subsection entitled Management Common to AI Alternatives, it states:	

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				<p>“In collaboration with interested parties, 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>Further, Table 2.1.22 outlines the proposed management actions relative to OHV for each alternative. Readers should note that Alternatives A, B, C, and E all implement a change from existing policy in that OHV travel would be permissible only on designated routes and in designated areas. OHV outside of these routes and areas would not be permissible.</p>	
Candee Pearson	I-163	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Graham Stafford	I-165	TR34 (ATR-2)	BLM should establish a reasonable balance of recreation and wilderness protection in its transportation plan. No routes should be left open unless they serve some legitimate and identified purpose, and all off-road vehicle trails not designated "open" in the citizens' Heritage plan should be closed.	<p>See comment responses TR18, TR29, and TR36.</p> <p>BLM considered the heritage plan in the preparation of their travel options outlined in the RMP.</p>	
Bryan Wyberg	I-166	TR38 (JTR-2)	BLM must establish a reasonable balance of recreation and wilderness protection in its transportation plan. Hikers, backpackers, river runners, hunters, etc., treasure the area for its abundant whitewater opportunities, big game and backcountry wilderness, yet their interests are given little consideration in this RMP proposal.	The BLM is mandated by FLPMA and other legislation and policy to manage lands under its jurisdiction for multiple use and sustained yield. These multiple uses include, among other things, both motorized and non-motorized activities. The management actions within the RMP include provisions for allowing OHV travel, while restricting the extent of the area within which this activity can	

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				<p>occur. The RMP also includes such actions as designation of SRMAs, ACECs, and WSRs that provide opportunities for non-motorized recreation.</p> <p>See comment responses TR20 and TR36.</p>	
Bryan Wyberg	I-166	TR39 (JTR-3)	<p>ORV regulations and enforcement needs to be increased so that it stops ORV-caused landscape visual effects, stops ORV-related unpleasant experiences for the majority of users and stops destruction of fragile ecosystems. The Citizen's Plan recognizes the multiple use character of the BLM but restricts ORV use to areas where its damaging effects can be reduced or contained.</p>	<p>See comment responses TR22, TR29, and TR38.</p> <p>The Travel Plan to be completed following the RMP would incorporate education, information, monitoring and enforcement as critical components to the plan to ensure its success.</p>	
Bryan Wyberg	I-166	TR40 (JTR-4)	<p>Vehicles should be restricted to designated roads and trails throughout the entire resource area, no "open" ORV play areas (with the possible exception of certain small, manageable areas that do not conflict with other resource values).</p>	<p>Alternatives A, B, C, and E propose travel restrictions through management areas, which differ from the open OHV conditions under the existing management plan.</p> <p>Alternatives A, B, C, and E identify four small "open" areas (approx. 300-600 acres in size each). They have been located in areas already devoid of most vegetation and are relatively innocuous to resource issues.</p> <p>Also see comment responses TR22, TR29, and TR38.</p>	
Bryan Wyberg	I-166	TR41 (JTR-5)	<p>All routes should serve some identifiable purpose. If there is no compelling reason for a route to stay open, it should be closed.</p>	<p>Comment noted.</p>	

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Bryan Wyberg	I-166	TR42 (JTR-6)	The transportation plan must continue to make sense until the next management revision, 15-20 years from now. Use levels will almost certainly be higher with time, so any routes designed now must be capable of sustaining high use without causing ecological damage or ruining the peace and quiet that most visitors come to experience. There needs to be adequate opportunities for non-motorized and motorized groups while avoiding conflict between the 2 groups.	<p>The BLM is striving to meet the increased demands of all of its multiple-use groups. The proposed RMP is designed to help the BLM manages these conflicting resources.</p> <p>See comment response TR29 regarding future adjustments to the RMP related to travel.</p> <p>Also see comment response TR38 regarding non-motorized and motorized vehicle use in the planning area.</p>	
Bryan Wyberg	I-166	TR43 (JTR-7)	Many of the pervasive threats to biological diversity—habitat destruction, fragmentation, exotic species, pollution, etc, as well as CR vandalism—are exacerbated by the existence of roads. There should be a “closed unless signed open” policy. This policy makes it very easy for visitors to determine what is open and what is not.	See comment responses TR22, TR29, TR38, and TR45.	
Bryan Wyberg	I-166	TR44 (JTR-8)	As user levels increase, combining non-motorized and motorized users on the same trail system becomes unacceptable. There needs to be a fair allocation between motorized and non-motorized users.	See comment response TR38.	
Bryan Wyberg	I-166	TR45 (JTR-9)	Ecologically damaging routes, such as routes through riparian areas or important wildlife habitat, should be closed.	<p>See Table 2.1.13 (Recreation Resources) of the PRMP/FEIS under the Standards for Rangeland Health Recreation Guidelines 1:</p> <p>In all other areas, travel routes and other disturbances should be kept to the minimum necessary to provide access and visitor facilities appropriate to the area. Through blocking, signing, and public education, unneeded travel routes should be eliminated and rehabilitated and unplanned</p>	

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				development of new ones discouraged. It may be necessary to manage some areas to be entirely free of planned travel routes.	
Bryan Wyberg	I-166	TR46 (JTR-10)	There needs to be adequate opportunities to get out of earshot of motorized trails. Currently a large majority of lands managed by BLM are within 1 mile of a motorized trail or road. This is not acceptable. Many routes which penetrate deeply into otherwise roadless areas should be closed in order to provide a more balanced spectrum of near-road and far-from-a-road recreational opportunities.	See comment response TR38 regarding balancing motorized versus non-motorized vehicle use, FLPMA, and closing of roads.	
Dwayne Rowland	I-167	TR33 (ATR-1)	BLM should continue to manage these areas with all citizens in mind, not just a few who would deny access to these remote areas. I am 60 years of age and the only access I would ever have to these places is via ATV trails.	It is the BLM's plan, in development of the Activity Level Travel Plan that will be completed following approval of the proposed RMP, to collaboratively work with individuals, groups, and governments to produce a network of both motorized and non-motorized trails to accommodate many users including those with limited abilities. See comment response TR29.	
Martin D. McGregor	I-168	TR36 (ATR-4)	...a travel plan similar to the Price-San Rafael area should be adopted (closed unless signed or mapped as open).	Table 2.1.22 outlines the proposed management actions relative to OHV for each alternative. Readers should note that Alternatives A, B, C, and E all implement a change from existing policy in that OHV travel would be permissible only on designated routes and in designated areas. OHV outside of these routes and areas would not be permissible.	
Chad F. Hamblin	I-175	TR35 (ATR-3)	I feel that off-road vehicles should be limited to designated routes, and that no new routes should be developed for ATV use.	Comment noted.	
Jack Dobbins	I-176	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	

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Form Letter 2	FL2	TR34 (ATR-2)	BLM should establish a reasonable balance of recreation and wilderness protection in its transportation plan. No routes should be left open unless they serve some legitimate and identified purpose, and all off-road vehicle trails not designated "open" in the citizens' Heritage plan should be closed.	See comment responses TR18, TR29, and TR36. BLM considered the heritage plan in the preparation of their travel options outlined in the RMP.	
PacifiCorp	O-7	TR48 (NTR1)	All of the alternatives presented in the DRMP should acknowledge existing authorizations and allow for rights-of-way access to maintain and operate the network of existing transmission lines critical to PacifiCorp's overall system.	See comment response GC24.	
Duchesne County Water Conservancy District	O-10	TR1 (TR-N)	We request that the BLM articulate its policies regarding the granting of Title 5 rights of way to counties and provide a Title 5 right of way agreement template in an appendix of the RMP.	The request is beyond the scope of this document. Title V rights-of-way are clearly explained in FLPMA. It is not necessary to repeat that information in this document.	
Duchesne County Water Conservancy District	O-10	TR31 (TR-O)	This item talks about the elimination of "unneeded travel routes." DCWCD would like to see this amended to take into account Duchesne County planning for transportation and require input by county entities before such elimination of routes takes place.	See comment response TR7.	
Duchesne County Water Conservancy District	O-10	TR5	There are many roads on BLM land that are not officially "county roads," but are public (Class D) roads that have RS 2477 rights. Many of these appear on the Duchesne County Transportation Plan that has been provided to the BLM. Can the BLM recognize such rights in this part of the document?	A "D" route does not equate to a County road assertion. The routes identified as "D" routes in the DRMP/DEIS are roads located on public lands and managed by the BLM until properly adjudicated. The DRMP/DEIS proposes four different alternatives to manage these routes. As specified in the Draft RMP/DEIS Section 1.8 these issues are addressing RS 2477 assertions and are beyond the scope of this planning effort.	

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				<p>However, nothing extinguishes any right-of-way or alters in any way the legal rights the State and Counties have to assert and protect RS 2477 rights.</p> <p>See comment response TR8.</p>	
Duchesne County Water Conservancy District	O-10	TR6	Duchesne County favors Alternative B. The county promotes the continued use of roads that serve a public interest. The county would like the ability to maintain and upgrade existing roads and propose realignments to address safety or environmental issues. The county recognizes the importance of Off Highway Vehicles to the economy of the area; however, the damage OHV use causes to the environment is of concern. We feel that Alternative B strikes an acceptable balance.	Comment noted.	
Duchesne County Water Conservancy District	O-10	TR7	Closing or restricting access over public lands is mentioned in this paragraph. Duchesne County requests that this paragraph make it clear that such closures or restrictions would not effect roads shown on county transportation plans or roads with RS 2477 rights.	This clarification is provided for in Section 1.8, Issues Beyond the Scope of the PRMP/FEIS.	
Howard County Bird Club	O-18	TR17 (TR-A)	In preparing the Travel Management Plan, BLM should use a screening process to decide which of the existing routes will be approved for OHV travel, and which will be closed and returned to a natural condition.	See comment response RE20.	
Vermillion Ranch Limited Partnership	O-33	TR58 (R-TR1)	Several provisions in the BLM rules and handbook direct BLM to incorporate the county land use plans and to make the BLM plan consistent with the plans and policies of tribal, state, and local governments to the maximum extent possible consistent with federal law. 43 U.S.C. §1712(c)(9); 43 C.F.R. §§1610.3-1(c)(1); 1610.3-2; BLM Planning Manual 1601.02, ¶C. Thus, the county transportation system, which is a	<p>See comment response TR7.</p> <p>Daggett, Duchesne, and Uintah Counties were coordinating partners in the development of the RMP and provided input in the development of the transportation plan within the RMP.</p>	

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			large part of the respective county plans, needs to be considered and BLM should try to resolve inconsistencies as part of the land use planning process.		
Vermillion Ranch Limited Partnership	O-33	TR59 (R-TR2)	The planning handbook requires BLM to develop maps showing roads and the transportation system. BLM H-1601-1, Appendix C, ¶3. While the handbook reserves for a future date the transportation or travel planning format, there can be no doubt that BLM must consider public roads, and claims of public roads as part of the plan. Thus, BLM must include the county's travel plan as a major issue, part of the inventory, and then identify the roads for which there is no dispute are public.	See comment response TR7. As the BLM continues to work on the travel plan after the approval of the proposed RMP, the BLM will work with its cooperating agencies and other entities to identify both motorized and non-motorized travel routes in accordance with WO IM 2004-005.	
Vermillion Ranch Limited Partnership	O-33	TR60 (R-TR3)	While the R.S. 2477 issue is subject to the Memorandum of Understanding signed in April 2003, it does not relieve BLM of recognizing and incorporating the public roads into the transportation plan. Omitting this important issue makes the travel management portion of the plan flawed from the outset. This is especially true for long-standing county roads that BLM has always conceded are not under its jurisdiction.	See comment response TR58.	
Vermillion Ranch Limited Partnership	O-33	TR61 (R-TR4)	Modify the following statement as indicated by bolded additions and strikethrough deletions: "Revised Statute 2477 assertions and county roads, concerning the public construction of roads across public lands, as proposed by the counties and state or county roads within the planning area would be addressed with current policy."	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 or preferences.	

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				The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	TR61A (R-TR4)	R.S. 2477 roads are not “constructed” in the present tense. The BLM must recognize R.S. 2477 rights-of-way and other public roads. 43 U.S.C. §§1701 n.701(g); 1715(a). The RMP fails to do so. In this respect, the RMP is not consistent with county plans.	See comment response TR58.	
Vermillion Ranch Limited Partnership	O-33	TR62 (R-TR5)	BLM's Planning handbook requires the RMP to address transportation issues, which includes state and public roads. The RMP omits most of the county roads that are important points of access for public land users.	See comment response TR58.	
Vermillion Ranch Limited Partnership	O-33	TR63 (R-TR6)	Delete the following from this section: "Ashley Creek drainage, White River, Jackson Draw, Warren Draw, Allen Draw, Red Mountain, Wild Mountain-south, Pot Creek, Spring Creek, Nine Mile, Red Mountain East and West, and Moon Shine area..."	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 or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	TR63A (R-TR6)	The RMP fails to document the need for public access across private land. The RMP omits most, if not all, of the county roads and rights-of-way. Before Condemning easements, BLM needs to document the need to acquire access by including public roads and routes and determining the cases where there is	The RMP notes that the proposed easements are for recreational purposes. BLM would not condemn for public access. See comment responses LR8 and LR9.	

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			inadequate public access.		
Vermillion Ranch Limited Partnership	O-33	TR64 (R-TR7)	<p>Add an additional goal and objective to the list as follows:</p> <p>“Travel management would account for valid existing rights and would incorporate the county and other public roads.”</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>	
Vermillion Ranch Limited Partnership	O-33	TR64A (R-TR7)	The added bullet reflects the need for the RMP to recognize and consider valid existing rights impacts to travel management (i.e., public roads, including R.S. 2477 rights-of-way).	See comment response TR58.	
Vermillion Ranch Limited Partnership	O-33	TR65 (R-TR8)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"As Euroamericans settled the Uinta Basin, establishing efficient travel avenues was of vital importance in aiding the growth to settlements, the mining industry, and the agriculture and ranching businesses. In addition to the state and county road systems in the VPA, there are To date, identified transportation related sites include trails, paths, paved or unpaved roads..."</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>	

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				The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	TR65A (R-TR8)	The RMP must address the transportation system. H-1601, App. C, ¶C.1. The county public roads, including those that arose pursuant to R.S. 2477, must be included. The RMP and DEIS are deficient by attempting to ignore the public roads, over which BLM has limited or no jurisdiction.	The discussion in this section is related to the classification of transportation components and systems as cultural resources under the umbrella of the National Historic Preservation Act (NHPA) and is not a political or jurisdictional statement. The ownership of the transportation component in question is irrelevant as to where the component is considered a cultural resource site under the NHPA.	
Vermillion Ranch Limited Partnership	O-33	TR66 (R-TR9)	RE: the statement beginning with "All public lands in the VPA..." and ending with "Corridors may be designated as Active or Contingency."	The BLM is aware of its requirements regarding allowing reasonable access to inholdings such as state lands. The BLM will continue to follow this requirement under the new RMP.	
Vermillion Ranch Limited Partnership	O-33	TR66A (R-TR9)	Access to permits and leases is governed by law and cannot be limited to a defined area. BLM must also allow access to Utah trust lands. State of Utah ex rel. Cotter Corp. v. Andrus, 487 F. Supp. 995 (D. Ut. 1979).	The BLM's policy, as required by the Cotter decision (State of Utah v. Andrus, 10/1/79), is that "the State must be allowed access to the State school trust lands so that those lands can be developed in a manner that will provide funds for the common school" This decision confined the issue of access to situations directly involving economic revenues generated for the school trust.	
Vermillion Ranch Limited Partnership	O-33	TR67 (R-TR10)	Modify the following statement as indicated by bolded additions and strikethrough deletions: "Access to public lands is provided throughout the VPA. BLM must provide access to inholdings or access pursuant to a permit or lease. In situations when BLM is not required to grant a right-of-way pursuant to law or regulation, BLM can close or limit access, Access should be closed or restricted, where necessary, to protect public health and safety and to protect significant resource values."	Section 3.6.6 in the PRMP/FEIS has been revised to read as follows: "Access to public lands is provided throughout the VPA. Access should be closed or restricted, where necessary, to protect public health and safety and to protect significant resource values. Easements can be acquired to provide access to public lands for recreational, wildlife, range, cultural/historical, mineral, ACEC, special management areas, and other resource needs. Note that all valid existing	X

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				leases and rights are acknowledged by the BLM, and management actions implemented through approval of the Final RMP and Record of Decision do not apply retroactively to these leases and rights."	
Vermillion Ranch Limited Partnership	O-33	TR67A (R-TR10)	This section overstates BLM's authority and is limited to situations when BLM issues a Title V right-of-way and there is no other legal basis to require BLM to grant access, e.g. telecommunications or pipeline rights-of-way.	See comment response TR66.	
Vermillion Ranch Limited Partnership	O-33	TR68 (R-TR11)	Delete the statement: "Public access to the Diamond Mountain public lands is limited because of private ownership."	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 or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	TR68A (R-TR11)	The RMP must document the lack of alternative access or delete this statement. The RMP omits the county roads and road systems, thereby omitting possible access.	If the BLM finds that a county claims a public road to where the public desires access, then the BLM would work with the county to ensure that public access is indeed in place.	
Center for Native Ecosystems	O-38	TR37 (JTR-1)	Existing routes that have not been specifically designated for motorized use should be closed and rehabilitated. Consider closing routes that cross these (prairie dog) complexes. The BLM should ensure that	BLM enforces the regulations and issues penalties but can only do so when violations are observed in real time.	

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			off-road vehicle regulations are enforced and that fines serve as deterrent to noncompliance.	Also see comment responses TR34 and TR36.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	TR49 (NTR2)	In core species recovery areas, we recommend that the land manager work to reduce road density to a level that encourages return of wildlife and prevents further population loss of certain species.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	TR50 (NTR3)	Routes not needed by the public can be closed with a gate or the route removed and reclaimed.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	TR51 (NTR4)	In general, we recommend that when linkages connecting core recovery areas intersect well-used highways, structures allowing the passage of wildlife be constructed.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	TR52 (NTR5)	Vehicle use must be limited to designated routes and linkages.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	TR54 (NTR7)	High densities of roads have been shown to negatively impact certain species of animals. In particular, densities of more than one mile on road/square mile represent a level of access that is associated with more pronounced effects on wildlife species such as wolves (<i>Canis lupus</i>) and bears (<i>Ursus spp.</i>) that are sensitive	Comment noted.	

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			to contact with humans (Thiel 1985, Van Dyke et al. 1986, Mech et al. 1988, Lovallo and Anferon 1996, Mace et al. 1996). Road densities within the VFO should be below this level.		
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	TR55 (NTR8)	Roads can fragment habitat of dispersal-limited species. Some of these species, which tend to be small, display "acute road-avoidance effect" in which animals remain at some distance from the road and never or very rarely attempt to cross. Efforts should be made to reduce road-related habitat fragmentation.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	TR56 (NTR9)	BLM's analysis of alternative area and route designations does not provide sufficient protection for other resources from the impacts of OHVs.	The anticipated impacts of OHV and travel management decisions on other resources and uses within the planning area are discussed in Sections 4.2 through 4.22. .	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	TR57 (NTR10)	More environmentally protective route designation alternatives should be considered and adopted.	See comment responses TR22, TR29, TR38, TR40, and TR45.	

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State of Utah	G-1	VE4	<p>The State of Utah strongly requests that the BLM expand its discussion in the EIS allowing for a long-term and aggressive vegetative reclamation program using a wide variety of vegetation treatment tools. The BLM needs to specifically identify some of these tools that are currently omitted in its review of vegetation management in the West (in the DEIS), i.e., use of herbicide for cheatgrass control and chaining for better pinyon-juniper management. Without the use of a full vegetation management toolbox, the BLM will not be able to conduct effective restoration on a scale sufficient to stop or reverse the current rate of sagebrush steppe loss, nor will they be able to provide meaningful mitigation for development. The long-term vegetative reclamation program must be a collaborative effort involving the BLM, livestock operators, the oil and gas industry, and wildlife advocates if it is to be successful.</p>	<p>Table 2.1.23 (Vegetation Resources) of the PRMP/FEIS provides for vegetation treatment (specific to noxious weed control) under all alternatives using fire, mechanical, biological, or chemical means without specifying any individual management tool that would fall under one of these broad categories. This section also refers to management of vegetation in general terms without specifying individual techniques. This provides the BLM the opportunity to select from the entire range of available tools to undertaken vegetation treatments in the most appropriate way for the location and vegetation in question.</p>	
State of Utah	G-1	VE5	<p>The EIS should expand the discussion on development of a mitigation bank as discussed between the BLM, Uintah County, the State of Utah (DWR), and industry representatives in order to ensure that this opportunity is maintained as an option.</p>	<p>The concept and implementation of a mitigation bank is completely voluntary. The BLM cannot require lessees and permittees to participate. However, the concepts involved in a successful mitigation-banking program include reclamation or habitat enhancement projects, which are addressed in the RMP.</p>	
State of Utah	G-1	VE6	<p>We are concerned that the alternatives for rangeland improvements found on page 2-51 may not allow enough acreage for such improvements to occur, especially since the Vernal District has experienced catastrophic mortality of sagebrush steppe communities. The numbers of acres in the Uintah Basin (>200,000 acres) requiring pinyon/juniper</p>	<p>The acreage figures presented in Table 2.3 to which the comment refers are specific to projected rangeland improvements. Vegetation treatments are also included under other resource programs. Table 2.1.23 (Vegetation Resources) of the PRMP/FEIS commits to the restoration or rehabilitation of up to 200,000 acres of sagebrush</p>	

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			removal, sagebrush rehabilitation, and cheatgrass control far exceed the figures presented in each of the alternatives. We encourage the BLM to add flexibility to the RMP to allow for additional rangeland improvement if target acreages are met prior to the next revision of the RMP.	steppe communities under all alternatives. Additionally, the acreages provided within the individual alternatives are projections used for comparison purposes and do not represent absolute caps on the numbers of acres of vegetation that the BLM may treat.	
State of Utah	G-1	VE7	This paragraph should be changed to read: "Wyoming and mountain big sagebrush are declining..." The UDWR recommends adding discussion regarding the recent sagebrush mortality in the RMP.	Section 3.16.1.3 in the PRMP/FEIS has been revised to include the following: "Wyoming and mountain big sage are declining...Beginning in the late 1990s, drought accelerated the decline which resulted in a sage die-off and die-back. Some areas had sagebrush mortality while others had re-growth on the sagebrush in subsequent years.	X
State of Utah	G-1	VE8	Plateau®, green stripping, and use of non-natives must be considered in Section 3.16.2 for control of invasive species and noxious weeds.	See comment response VE4.	
Duchesne County	G-9	VE1	Duchesne County has adopted a list of noxious weeds, which was provided to the BLM staff at the February 9, 2005 open house in Duchesne. The status column in this table may need to be amended accordingly.	All of the plants listed in the comment are already included in Table 3.16.6 except for Tamarisk, which is discussed at the end of Section 3.16.2. The "Status" column of Table 3.16.6 has been revised to identify which of the plants are listed by Duchesne County as noxious weeds.	X
Duchesne County	G-9	VE3	Alternative C would have lesser beneficial impacts on vegetation resources than Alternative A (not more). This is because Alternative C would not automatically provide for the same level of vegetation removal as Alternative A, which increases the chances for catastrophic wild fires (see Section 4.13.2.14.3).	The woodland and forest species salvaging is proposed for Alternative A and limited in Alternative C (Section 4.13.2.14.3). The level of this activity under Alternative A would have long-term adverse impacts to soil and water resources because of surface disturbance and subsequent soil erosion and sedimentation in streams. These effects would adversely affect the vegetation under Alternative A, and less so under Alternative C. In fact, the two	X

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				alternatives are probably comparable in their effect on vegetation. The PRMP/FEIS has been revised to reflect this analysis.	
U.S. Fish and Wildlife Service	G-12	VE22 (JVE-7)	We appreciate the discussion of invasive species and noxious weeds, and believe it should be expanded upon in other related discussions. For example, the document notes, "Of particular management concern are potential and existing populations of invasive species in the oil and gas fields that are receiving increased activity and interest", However, at no point in the document does it analyze the position of those populations relative to the known populations of federally-listed plant species, particularly those areas which will be open to energy development- It's an analysis that should be done. In addition, a discussion regarding the VFO's management direction regarding biological control of tamarisk using the Chinese leaf beetle and including the risks and benefits would be appropriate here.	See comment response VE4. Mapping of weeds is an ongoing project. More detailed analysis of noxious weeds and invasive plants relative to specific listed species of plants would be conducted at the field-development NEPA or site-specific NEPA stage when the locations of these plant populations relative to each other can be more readily defined through inventory and mapping.	
U.S. Fish and Wildlife Service	G-12	VE23 (JVE-8)	Last paragraph, 3rd sentence: "However, some areas of tamarisk are currently protected as critical habitat for the federally endangered southwestern willow flycatcher, which further complicates its management." Although southwestern willow flycatchers have been possibly identified along the White River near Ouray (genetics testing has not yet been completed), the VPA does not contain any designated critical habitat for the species.	The commenter is correct. The Vernal Planning Area contains no designated critical habitat for the southwestern willow flycatcher. Section 3.16.2 of the PRMP/FEIS has been revised to reflect the issue made in the comment.	X
U.S. Fish and Wildlife Service	G-12	VE24 (JVE-9)	BLM should develop and implement monitoring of the population and habitat status of all plant species of conservation concern within the VPA. Specific conservation measures should be established to protect them. We recommend greater specificity regarding individual species and their needs. The BLM	The RMP provides for establishing conservation measures in accordance with BLM Manual 6840.	

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			should designate areas of lands to be set aside as plant preserves.		
U.S. Fish and Wildlife Service	G-12	VE25 (JVE-10)	The current document should carry over any and all protections from previous RMPs. The current plan should protect, via a "no surface disturbance" stipulation, no less than the 48,000 acres previously protected in the Diamond Mountain RMP, plus additional protections for the former Book Cliffs RMP area. Relict vegetation communities identified in the Diamond Mountain RMP, the original 3,740 ac at a minimum should be carried forward and excluded from land use authorizations. Areas with plants and/or potential habitat should be retained in the new plans and clearly identified as requiring implementation of the avoidance and minimization measures contained in the oil and gas lease notifications.	Management prescriptions from the previous RMP's were analyzed during alternative development. If they were no longer necessary, duplicative, or did not meet the objectives of the alternative they were dropped from consideration. See Section 2.4 of the PRMP/FEIS for a discussions of alternatives considered but eliminated from detailed analysis.	
U.S. Fish and Wildlife Service	G-12	VE-6	"Unique features within the planning area include...the Pariette Wetlands, which provide habitat for over 100 species of wildlife." What about plants?	Section 1.4 of the PRMP/EIS has been revised to acknowledge the plant communities of the Pariette Wetlands.	X
UBAOG	G-22	VE2	The draft RMP/EIS focuses only on the negatives of livestock grazing while completely ignoring the fact that wild horses and wildlife will have similar and possibly greater impacts [on vegetation].	The section of the document to which the comment refers is specific to the potential impacts of livestock grazing and forage decisions on vegetation resources. The potential impacts of other resource program management decisions on vegetation are discussed elsewhere. The potential impacts of wild horse management decisions on vegetation resources are discussed in Section 4.16.2.14. The potential impacts of wildlife management decisions on vegetation are discussed in Section 4.16.2.15.	
UBAOG	G-22	VE3	Alternative C would have lesser beneficial impacts on vegetation resources than Alternative A (not more). This is because Alternative C would not automatically provide for the same level of vegetation removal as Alternative A, which increases the chances for	The woodland and forest species salvaging is proposed for Alternative A and limited in Alternative C (Section 4.13.2.14.3). The level of this activity under Alternative A would have long-term adverse impacts to soil and water resources because of	X

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			catastrophic wild fires (see Section 4.13.2.14.3).	surface disturbance and subsequent soil erosion and sedimentation in streams. These effects would adversely affect the vegetation under Alternative A, and less so under Alternative C. In fact, the two alternatives are probably comparable in their effect on vegetation. The PRMP/FEIS has been revised to reflect this analysis.	
Chad F. Hamblin	I-175	VE11 (AVE-1)	<p>I think what is meant by “vegetation treatments” should be more thoroughly explained in the plan. I didn’t find “chaining” mentioned in the plan, but I know chainings have often been referred to as “vegetation treatments”. Also, I’ve seen a lot of places on BLM land where all of the pinion/juniper trees are cut from large areas, and I don’t see much difference between this and chaining. I don’t think either of these methods, or any other vegetation treatment- including poisoning or mechanical removal of sagebrush – should be allowed. I think there should be only two exceptions to this:</p> <p>1) controlled or natural burns should be allowed when appropriate (only when this won’t hasten the spread of cheat grass)</p> <p>2) A full range of treatment options including the use of cutting and careful use of herbicides, should be allowed when dealing with exotic, invasive species – such as tamarisk.</p>	<p>The BLM has intentionally declined to specify precise tools (e.g., chaining, specific herbicides, etc.) under these broad headings in order to allow flexibility in the treating vegetation over the life of the RMP.</p> <p>See comment response VE4.</p>	
The Nature Conservancy Moab Project Office	O-6	VE28 (LVE-3)	We believe it is necessary to know how the indirect effects of exploration and development such as road dust, fragmentation, and invasive species, etc, affect those Special Status Species plants.	Anticipated impacts on special status species (both plant and animal) from proposed resource program management actions under both all alternatives and each individual alternative are outlined in Section 4.15 of the document and summarized in Table 4.15.1. The level of detail in the analysis is presented on a landscape level. More specific impacts would be assessed and either avoided, minimized, or mitigated to the extent possible	

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				through field-level and/or site-specific environmental analyses (NEPA documents, technical reviews, etc.).	
The Nature Conservancy Moab Project Office	O-6	VE29 (LVE-4)	It should be discussed in the FRMP that several plant species may experience irreversible and irretrievable impacts.	Long term impacts on special status species plants are acknowledged in Section 4.15.5. The BLM does not believe that these resources would experiences irreversible or irretrievable impacts under the proposed management program, which includes avoidance, minimization, and mitigation measures for activities with the potential to impact special status species.	
IPAMS	O-14	VE26 (LVE-1)	Calculation errors in vegetation disturbance between Table 4-1, Table 4.16.6 since some short-term disturbance could continue over the life of the well and should be considered long-term disturbance	See comment response VE9. Table 4-1 displays total disturbance per well. Table 4.16.6 displays short-term and long-term disturbance (which together equals total disturbance) for the predicted number of wells by alternative.	
Westport Oil and Gas Company	O-28	VE10 (VE-B)	This section states that estimated disturbance by individual well development would total 18,971 acres. However, p. 4-331 (Woodlands and Timber Resources) also states that 18,971 acres of woodlands could be adversely affected from oil and gas development. Since woodlands and timber resources are a small portion of the vegetation community in the Vernal planning area, this statement appears to be incorrect. These numbers should be recalculated and corrected in the RMP/EIS.	In Woodlands section 4.20.2.3, the PRMP/FEIS text states that 18,971 acres of woodlands could be affected by minerals impacts. At the programmatic level of impacts analysis, the locations of oil and natural gas well sites in woodlands are unknown, but the analysis of impacts to woodland resources must consider the impacts of these wells as potentially being located in this vegetation type. In Vegetation Section 4.16.2.5.1 potential well surface disturbances of 18,971 acres includes all vegetation types, of which woodlands is one vegetation type. Again, without site-specific well locations the analysis cannot determine proportional impacts to each vegetation type, so the impacts must be considered at the broad, programmatic level.	

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Westport Oil and Gas Company	O-28	VE9 (VE-A)	There appear to be several errors in calculating vegetation disturbance. For example, adding the acres of disturbance for standard stipulations and timing limitations and controlled surface use does not equal 1,776,782. "Estimated surface disturbance by individual well development" does not total 18,971 acres. According to Table 4-1, surface disturbance would be less than 5 acres per well. The percent increase and increase of disturbance between Alternative A and Alternative D also should be recalculated. Table 4.16.6 shows 18,971 acres as total disturbance under Alternative A. This total is obtained by combining the short- and long- term disturbance. However, some short-term disturbance would continue over the life of the project and be included as long-term disturbance. As a result of this overlap, the two totals cannot be added together. These errors need to be corrected.	Section 4.16.2.5.1 in the PRMP/FEIS has been revised to correct the errors.	X
KerrMcGee Oil and Gas Onshore LLC	O-29	VE10 (VE-B)	This section states that estimated disturbance by individual well development would total 18,971 acres. However, p. 4-331 (Woodlands and Timber Resources) also states that 18,971 acres of woodlands could be adversely affected from oil and gas development. Since woodlands and timber resources are a small portion of the vegetation community in the Vernal planning area, this statement appears to be incorrect. These numbers should be recalculated and corrected in the RMP/EIS.	In Woodlands section 4.20.2.3, the PRMP/FEIS text states that 18,971 acres of woodlands could be affected by minerals impacts. At the programmatic level of impacts analysis, the locations of oil and natural gas well sites in woodlands are unknown, but the analysis of impacts to woodland resources must consider the impacts of these wells as potentially being located in this vegetation type. In Vegetation Section 4.16.2.5.1 potential well surface disturbances of 18,971 acres includes all vegetation types, of which woodlands is one vegetation type. Again, without site-specific well locations the analysis cannot determine proportional impacts to each vegetation type, so the impacts must be considered at the broad, programmatic level.	
KerrMcGee Oil and Gas	O-29	VE9	There appear to be several errors in calculating vegetation disturbance. For example, adding the acres	Section 4.16.2.5.1 in the PRMP/FEIS has been	X

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Onshore LLC		(VE-A)	of disturbance for standard stipulations and timing limitations and controlled surface use does not equal 1,776,782. "Estimated surface disturbance by individual well development" does not total 18,971 acres. According to Table 4-1, surface disturbance would be less than 5 acres per well. The percent increase and increase of disturbance between Alternative A and Alternative D also should be recalculated. Table 4.16.6 shows 18,971 acres as total disturbance under Alternative A. This total is obtained by combining the short- and long- term disturbance. However, some short-term disturbance would continue over the life of the project and be included as long-term disturbance. As a result of this overlap, the two totals cannot be added together. These errors need to be corrected.	revised to correct the errors.	
Vermillion Ranch Limited Partnership	O-33	VE27 (R-VE27)	<p>Add the bolded information to the end of the following statement:</p> <p>"Sagebrush habitat reclamation or enhancement within crucial deer winter range under Alternative C would benefit this vegetation type, when compared to Alternative D – No Action (under which sagebrush habitat reclamation remains unspecified). Vegetation treatments in sagebrush communities would beneficially impact the development of the desired seral stages. Alternatives A and B would also reclaim disturbed sagebrush habitat areas, but at a lower ratio and producing fewer beneficial impacts to the vegetation than Alternative C, but more than Alternative D. These benefits would not be available in VRM Classes I and II or other areas where restrictions would preclude vegetation treatment."</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>	
Vermillion	O-33	VE27A	The RMP for the most part does not address the fact	No VRM Class designation precludes the	

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Ranch Limited Partnership		(R-VE27)	that many of the common to all alternatives restrictions would limit assumed benefits. The RMP should either delete the exaggerated claims of environmental benefit or remove the unnecessary restrictions.	implementation of vegetation treatments.	
Vermillion Ranch Limited Partnership	O-33	VE31 (R-VE1)	<p>Delete the statement:</p> <p>"Current management direction is inadequate or lacking in opportunities to enhance the management of Watershed Values and Vegetation Resources" and replace with "The RMP needs to be revised to reflect regulatory changes relating to rangeland health standards."</p> <p>BLM did not implement planned range projects authorized in prior plans. Thus, the problem is not a matter of inadequate direction found in current management but a failure of BLM to implement the AMPs and grazing plans. There was also a policy during the 1990's of not funding range projects and the RMP should take responsibility for this situation.</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>	
Vermillion Ranch Limited Partnership	O-33	VE32 (R-VE2)	<p>Change the listing of vegetation management goals to read as follows:</p> <p>"Manage the vegetation to attain the ecological stage that would: Ensure sustainability; Meet grazing preference for livestock and forage authorized use allocations (livestock, for wildlife, wild horses); Ensure species diversity."</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>	

Vegetation

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				The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	VE33 (R-VE3)	<p>Alternative A—Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"245,649 AUMs allotted could result in short-term impacts that include loss of vegetative cover and biomass, and trampling, with long-term impacts such as reductions in plant productivity and regenerative ability, and increases in weeds; though 50% upland vegetation utilization by livestock, and 4" stubble height of key herbaceous species measured from the green line 30% riparian vegetation utilization would set limits on grazing impacts. These impacts are equal or less than those by wild horses and big game."</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>	
Vermillion Ranch Limited Partnership	O-33	VE33A (R-VE3)	The DEIS only addresses the effects of livestock on vegetation when wild horses and big game have similar and possibly greater impacts. This discussion reveals a significant bias against livestock grazing. It is also inaccurate to say that continued grazing of livestock would have negative impacts when this area is also grazed by wild horses and big game, whose numbers have increased. The vegetation in this region is well-adapted to grazing and continued livestock grazing does not and will not have adverse impacts.	Potential impacts on vegetation resources from wild horses and wildlife are discussed in Sections 4.16.2.14 and 4.16.2.15, respectively.	
Vermillion Ranch Limited Partnership	O-33	VE34 (R-VE4)	<p>Alternative A—Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"34,640 acres of rangeland improvements would help restore natural vegetation communities, eliminate</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</p>	

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			weeds, and control livestock movement (through fencing). Guzzlers and reservoirs may have some minimal would have adverse impacts. Range improvements will also facilitate better distribution of wild horses and wildlife throughout the area."	<p>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.</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>	
Vermillion Ranch Limited Partnership	O-33	VE34A (R-VE4)	The draft RMP overstates the effects of vegetation use near water. The amount of land and the actual effects are much less than what is described.	The potential impacts of range improvements on vegetation are discussed in Sections 4.16.1 and 4.16.2.7. The potential impacts of range improvements on wild horses and wildlife are addressed in Sections 4.18.2.5 and 4.19.2.6, respectively.	
Vermillion Ranch Limited Partnership	O-33	VE35 (R-VE5)	<p>All Alternatives—Add the following to all alternatives:</p> <p>"Noxious weeds will be subject to additional control and prevention by funding local weed and pest control programs and enforcing reclamation terms to ensure that noxious weeds do not take hold on recently reclaimed areas. Vegetation treatments will also be aimed at reducing noxious weeds and encouraging desired vegetation."</p>	<p>The BLM declines to make the suggested wording change.</p> <p>See comment response VE4.</p>	
Vermillion Ranch Limited Partnership	O-33	VE35A (R-VE5)	The RMP is largely silent about addressing noxious weed issues. Presidential executive order requires each agency to make noxious weed control a priority.	The BLM's weed management program is in compliance with the Presidential executive order and is a funded high priority program for the Vernal Field Office. The BLM is an active member of the Uintah Basin Cooperative Weed Management Area and contributes to education programs, assists State lands in weed control and is a partner in	

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				grants and multi-agency weed control projects through the Cooperative Weed Management Area.	
Vermillion Ranch Limited Partnership	O-33	VE36 (R-VE6)	Delete the following statement: "Air quality impacts from these alternatives are generally projected to result in increased vegetation (density and height) and lower overall surface/soil disturbance."	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 or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	VE36A (R-VE6)	The assumed correlation between fugitive dust and vegetation is overstated and undocumented. Other than along roads or well sites, it is unlikely that development will generate sufficient dust to adversely affect vegetation.	The BLM believes that the potential effects of fugitive dust on vegetation is not overstated and must be disclosed. The BLM acknowledges that the bulk of these anticipated effects would be within ¼-mile of roads (see Section 4.7.2.3.2).	
Vermillion Ranch Limited Partnership	O-33	VE37 (R-VE7)	Alternative D-Modify the following statement as indicated by bolded additions: "Rangeland improvement vegetation treatments under Alternative D would occur on an estimated 40,390 acres. This is an estimate not a limit. Alternative D would benefit fire management more than Alternative A, but less than Alternatives B and C."	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.	

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				<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>	
Vermillion Ranch Limited Partnership	O-33	VE37A (R-VE7)	The RMP never discusses the reason that the Preferred Alternative would adopt less vegetation treatment. This makes little sense in the context of the plan. The RMP does not document the resource reason to limit vegetation treatment to specific number of acres.	Acres of vegetation treatments provided within the individual alternatives under each applicable resource program are projections used for comparison purposes and do not represent absolute caps on the numbers of acres of vegetation that the BLM may treat.	
Vermillion Ranch Limited Partnership	O-33	VE38 (R-VE8)	<p>Modify the following statement as indicated by bolded additions:</p> <p>"Impacts to livestock and grazing resources would occur under all of the proposed alternatives. The impacts could include those caused by road and trail construction and maintenance, wellpad construction, vehicle traffic, accidental spills of potentially hazardous materials, and noxious weed infestations. These impacts are generally mitigated as part of the conditions of approval."</p> <p>The RMP overstates the impacts on livestock grazing from energy development. The amount of land used for energy is relatively small and disruption occurs for a relatively short period of time. In some cases, dust will benefit the plants as well.</p>	Section 4.7.1 in the PRMP/FEIS has been revised to include the bolded comment text.	X
Vermillion Ranch Limited Partnership	O-33	VE38A (R-VE8)	<p>Delete the following statement:</p> <p>"For all of the alternatives, fugitive dust caused by vehicles traveling along proposed new roads, existing roads, and other areas of surface disturbance could</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>	

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			settle on vegetation used as forage, especially alongside roadway corridors with heavy traffic. This dust would potentially affect the quality and regenerative capacity of roadside grasses and forbs as well as decrease the palatability of the forage for livestock use."	<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>	
Vermillion Ranch Limited Partnership	O-33	VE38B (R-VE8)	The effects of dust are largely overstated and inaccurate. Any dust is limited to roadside vegetation, and would be removed with rain/snow and wind. This discussion lacks scientific basis. Even if there were dust on plants, it will not adversely affect the vigor of the plants.	The BLM believes that the potential effects of fugitive dust on vegetation is not overstated and must be disclosed. The BLM acknowledges that the bulk of these anticipated effects would be within ¼-mile of roads (see Section 4.7.2.3.2).	
Vermillion Ranch Limited Partnership	O-33	VE39 (R-VE9)	<p>Add the following statement:</p> <p>"The noxious weed issue is an ongoing problem, in large part due to wind and wildlife. Noxious weeds will take hold where the surface is disturbed and reclamation is delayed. Enforcement of reclamation terms and conditions and better coordination with local noxious weed control agencies will facilitate noxious weed efforts."</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>	
Vermillion Ranch	O-33	VE39A (R-VE9)	The RMP omits the role of wildlife and wind in facilitating noxious weed problems. These factors exist	Wind has been added as a contributing factor to the spread of noxious weeds in Section 3.16.2 of the	X

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Limited Partnership			in the planning area and have little or nothing to do with energy development.	PRMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	VE40 (R-VE10)	Snow removal chemicals and salt may affect roadside vegetation. However, the unpaved roads used for energy development do not see chemical snow removal. This discussion should be deleted.	It is unclear as to what the comment is referring to as there is no discussion of the use of snow removal chemicals and salt and their potential effects on roadside vegetation in this section of the document or any other.	
Vermillion Ranch Limited Partnership	O-33	VE41 (R-VE11)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Several areas have proposed wildlife and fisheries management decisions that would limit or reduce access and disturbance seasonally or year-round. Surface disturbance restrictions will not apply to livestock grazing activities, including vegetation treatment and range project construction. Impacts from the proposed designations are generally projected to have relatively minor effects on livestock grazing."</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions 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	VE41A (R-VE11)	Range projects should not be regulated as surface disturbing activities. The RMP needs to explicitly provide that vegetation treatments or range project construction are not defined as and are not regulated as surface disturbing activities. As written this section implies that vegetation treatments and range projects would be prohibited in these areas. There is no scant [sic] research supporting the proposition that wildlife (big game) are adversely affected or harmed by vegetation treatments or range project construction. Accordingly this section needs to be revised.	The section referred to in the comment says nothing about range improvements. The section acknowledges that vegetation treatments would occur, therefore, they are clearly not excluded by proposed restrictions on surface disturbing activities. With regards to the second part of the comment, the section referenced discusses the potential impacts on livestock grazing from wildlife and fisheries management alternatives, not potential impacts on wildlife from vegetation treatments.	

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Vermillion Ranch Limited Partnership	O-33	VE42 (R-VE12)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Impacts associated with mineral management decisions would could be potentially adverse to livestock grazing, as they represent the potential loss of AUMs from mining, well-pad and access road construction, and the construction of support facilities. In most cases, these impacts are routinely mitigated, are of relatively short duration and affect a relatively small area. These impacts may be greater where energy development features dense well sites. Current RFD scenarios do not assume such a high density. Other potentially adverse but remote impacts from mineral development would include the production of fugitive dust, increased livestock management needs, decreased livestock dispersal, noxious and invasive weed encroachment, and the physical risks of livestock/vehicle collisions associated with increased vehicle traffic in grazing areas. There are often benefits where reclamation of right-of-way corridors and well pads establish more palatable forage."</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>	
Vermillion Ranch Limited Partnership	O-33	VE42A (R-VE12)	<p>In many cases reclamation also results in improved forage and reclamation standards call for spraying to control noxious weeds. Thus the discussion omits benefits and overstates the impacts.</p>	<p>See comment response VE4.</p>	
Vermillion Ranch Limited Partnership	O-33	VE43 (R-VE13)	<p>The new and costly restrictions on vegetation treatment and range structures appear to exceed BLM's statutory authority. This is also true for VRM classes that will make it difficult if not impossible to do vegetation treatments and range projects.</p>	<p>Under FLPMA, the BLM is given broad discretionary authority to manage public lands under its jurisdiction and implement management decisions that do not preclude the exercise of valid existing rights. The BLM does not believe that management decisions proposed relative to vegetation treatment and range structures impose an undue burden or preclude valid land uses.</p>	

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				See comment response VE27 regarding the impact of VRM Class designation on vegetation treatment.	
Vermillion Ranch Limited Partnership	O-33	VE44 (R-VE14)	There may be sound resource reasons to apply plant phenology analysis but these decisions need to be made at the allotment or site-specific level, rather than the programmatic level of the RMP.	See comment response LG18.	
Vermillion Ranch Limited Partnership	O-33	VE45 (R-VE15)	If vegetation treatments are planned for 156,425 acres, why does the DEIS conclude that only 40,390 acres will see improved forage? The RMP never justifies the reduction in vegetation treatments from the current RMP and certainly there is no resource management basis.	The commenter has incorrectly interpreted the analysis presented in the document. The 156,425 acres indicated in Section 4.7.2.5.1 refer to expected benefits to forage from vegetation treatments through prescribed fire. It is unclear where the commenter obtained the 40,390 acres figure as a conclusion of expected improved forage; however, it appears that the commenter may have taken the number from Section 4.7.2.4.4 (Alternative D), which describes anticipated forage benefit specifically from rangeland improvement projects. Anticipated acres of improvement to forage from different resource program management actions are not duplicative but are additive.	
Vermillion Ranch Limited Partnership	O-33	VE46 (R-VE16)	Modify the following statement as indicated by bolded additions and strikethrough deletions: “Decisions making lands unavailable for upland surface disturbance and riparian corridor disturbance may benefit would be beneficial to riparian resources. Beneficial impacts may would result from stubble height requirements, utilization levels, reduced use, and season of use changes that are proposed in some of the alternatives.”	Section 4.11 in the Final EIS text has been revised to include the suggested wording changes.	X

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			<p>This statement may not be accurate where natural erosion is the major or only factor in sedimentation. Similarly, limiting surface disturbance for vegetation treatments may prevent improvement of upland vegetation, which will also not benefit riparian resources.</p>		
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>VE47 (R-VE17)</p>	<p>Invasive species are not introduced by oil and gas or CBM development. The invasive species are already found on public lands due to wind, wildlife, and all manner of human activity.</p>	<p>Section 4.11.1 in the PRMP/FEIS states:</p> <p>"...road development providing access to oil, gas, and CBM leasing would increase risks of invasive species introduction..."</p> <p>This statement does not claim that oil, gas, and coal bed methane (CBM) development introduce invasive species but merely increases the risk that such introduction could occur.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>VE48 (R-VE18) (R-VE19)</p>	<p>Revise the DEIS as follows for this statement:</p> <p>"The effects of livestock and grazing, forage and wild horse decisions on soils would generally be short-term and direct. Through joint monitoring by the permittee and BLM and changes in range use, soils are unlikely to should not become degraded to the point where they lose productivity; therefore no long-term impacts should occur. Management decisions for livestock and grazing, forage, and wild horse resources may would always result in reduction in or loss of vegetative cover for a short time. and subsequent wind and water erosion, and loss of biological soil crusts, where they occur."</p> <p>Rangeland systems have evolved with grazing and are</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>	

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			adapted to it. Thus, it is difficult to support the statement that grazing will have direct adverse effects. It changes vegetation for a short time, this is not an adverse effect. The last phrase incorrectly assumes that the loss of vegetation cover is totally from grazing. This occurs for wild horses perhaps but not for any other grazing, when managed.		
Vermillion Ranch Limited Partnership	O-33	VE49 (R-VE8)	The entire discussion in Section 4.7.2.3.2 (Alternative A) regarding fugitive dust should be deleted.	<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>	
Vermillion Ranch Limited Partnership	O-33	VE49A (R-VE8)	It overstates any adverse effect, which is extremely minor and very temporary.	The BLM is required to disclose known or anticipated impacts to resources from management decisions considered in the RMP.	
Vermillion Ranch Limited Partnership	O-33	VE50 (R-VE20)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Forage and wild horse management decisions would affect soils and water resources when AUMs for livestock, wild horses, and/or wildlife are adjusted in response to evidence from joint monitoring that water</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>	

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			<p>quality or soil degradation is eminent or occurring. Depending on season of use and duration, adjusting AUMs would be a short-term, direct, and potentially beneficial impact, as it may would slow the loss of ground cover. On the other hand, greater forage utilization and more AUMs in a given area may put greater stress on the soils via trampling and loss of cover. The loss of vegetation would have direct, long-term, adverse impacts to water quality and soil productivity, especially in areas with soil limitations."</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>	
Vermillion Ranch Limited Partnership	O-33	VE50A (R-VE20)	<p>Vegetation is not lost unless the topsoil is stripped and plants are removed by their roots. The RMP overstates the effects of livestock grazing. If forage is used beyond proper management or capacity, then there would be stress. This assumes grazing exceeds current capacity, which it does not.</p>	<p>Conditions such as drought may result in increased vegetation loss and increased soil erosion prior to adjustments in AUMs.</p>	
Vermillion Ranch Limited Partnership	O-33	VE51 (R-VE21)	<p>Delete this entire statement:</p> <p>"With respect to livestock grazing, alternatives vary between season of use and duration of use. Due to growing seasons, effects on vegetation (and subsequently, on water and soils) vary depending on the season of use. For example, limiting grazing before periods of high runoff (generally due to spring runoff and late summer thunderstorms) reduces adverse impacts: banks that retain their vegetation are protected from erosion caused by high flows. A longer duration of use would result in greater impacts to vegetation, soils, and water in a given area."</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>	

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				<p>Allotment Management Plans (AMPs) are activity level planning and AMP decisions have to conform to the RMP direction.</p>	
Vermillion Ranch Limited Partnership	O-33	VE51A (R-VE21)	<p>Delete this entire statement:</p> <p>“All alternatives contain restrictions to livestock grazing during seasons of use as well.”</p> <p>These are decisions for the AMP not the RMP. Strike the statements as indicated.</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>	
Vermillion Ranch Limited Partnership	O-33	VE52 (R-VE22)	<p>Modify the statement as indicated by the bolded addition:</p> <p>"Maintaining plant stubble of key herbaceous species along the banks traps sediment and reduces stream bank erosion. Managing key riparian woody vegetation maintains bank stability by providing root structure, holding banks together, and reducing sediment transport. Maintaining riparian vegetation would also attenuate floodwaters and, therefore, lower runoff amounts and flooding levels."</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</p>	

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				adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	VE52A (R-VE22)	Stubble height should not be the sole measure, so important to add key herbaceous species.	The statement in question refers to the physical trapping of sediment by plant stubble, regardless of species. The nature of that stubble and its relationship to the health of the riparian ecosystem are discussed elsewhere in the document.	
Vermillion Ranch Limited Partnership	O-33	VE54 (R-VE24)	<p>Alternatives A, B, and C—Edit the statement as indicated:</p> <p>"Areas managed as VRM Class I would potentially provide beneficial impacts to vegetation by preventing visually degrading surface disturbances. Alternative A would manage 67,357 acres as VRM I, and Alternative C would manage 148,260 acres under this VRM Class."</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>	
Vermillion Ranch Limited Partnership	O-33	VE54A (R-VE24)	VRM classification has little if any impact on vegetation.	VRM Class I designation provides for some limitation on ground disturbing activities that can disrupt vegetation communities and create conditions where invasive species and noxious weeds can become established.	
Vermillion Ranch Limited Partnership	O-33	VE55 (R-VE25)	<p>Alternative D-- Edit the statement as indicated:</p> <p>"This alternative would manage 56,127 acres within the VPA as VRM Class I. Alternative C would have the most beneficial impacts on vegetation, with fewer beneficial impacts to vegetation under Alternative A. Alternative B and D would provide the least potential</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</p>	

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			benefit to vegetation from visual resource protection."	<p>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>Please, see comment response VE54.</p>	
Vermillion Ranch Limited Partnership	O-33	VE56 (R-VE3)	<p>Alternative D—Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"246,128 AUMs allotted could result in impacts similar to Alternative A; upland utilization and riparian use are covered in allotment management or grazing plans. unspecified upland vegetation utilization by livestock and no utilization specified for riparian areas could have indirect, adverse impacts on vegetation."</p> <p>Vegetation utilization and riparian use criteria are specified in individual grazing plans or allotment management plans. It is also important to note that utilization by itself is not a determinant of rangeland resource condition or health. It is only a single picture in time showing the plants and amount consumed. Utilization data provide little information regarding plant health and vigor or which species consumed the resource.</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>It would be inappropriate to modify Alternative D as that simply reflects the current decisions.</p>	
Vermillion Ranch	O-33	VE56	Alternatives A, B, C and D—Modify the following statement as indicated by bolded additions and	The BLM declines to make the suggested wording changes for a variety of reasons including but not	

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Limited Partnership		(R-VE26)	<p>strikethrough deletions:</p> <p>"Seasonal restrictions and limitations on surface-disturbing activities for the protection of wildlife may would indirectly benefit vegetation although increases in wildlife or big game or wild horses might have greater adverse impacts on vegetation and soil resources. Alternatives A, B, and C would provide slightly more protection than Alternative D – No Action, as the No Action Alternative would only restrict minerals activities. Alternatives A and B would stipulate limits on the amount of surface disturbance per township (560 acres per township), further reducing the direct adverse impacts to vegetation when compared to Alternative D – No Action, under which new surface disturbances remain unspecified."</p>	<p>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>	
Vermillion Ranch Limited Partnership	O-33	VE56A (R-VE26)	<p>Seasonal restrictions may also have cumulative adverse effects by concentrating development over a short time period and thus the effects occur throughout the VPA over a short time.</p>	<p>Wildlife management decisions are not directed at increasing population sizes but rather at maintaining species and habitat. Thus, the presumption in the comment that wildlife populations will increase and thereby have greater impacts on vegetation is erroneous.</p> <p>The compressed time frame for development would not be expected to have increased adverse impacts on vegetation as compared to impacts that would occur if development occurred over a longer period of time. Ultimately, the same acreage in the same locations would be subject to ground disturbance.</p> <p>It would be inappropriate to modify Alternative D as that simply reflects the current management decisions.</p>	

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Vermillion Ranch Limited Partnership	O-33	VE57 (R-VE4)	RE: Alternative D This discussion is another example of how the RMP focuses only on negatives of livestock grazing while completely ignoring the fact that wild horses and wildlife will have similar and possibly greater impacts. The omission of wildlife and wild horses from the vegetation is a chronic and unjustifiable flaw.	See comment response VE2.	
Vermillion Ranch Limited Partnership	O-33	VE58 (R-VE5)	Modify the following statement (page 4-83) as indicated by strikethrough deletions: "Areas of disturbed soil would lead to invasion by noxious weeds or other undesirable opportunistic plant species. These species would reduce rangeland and forage values by replacing preferred forage species, leading to a reduction in grazing capacity. Without proper management and control, invasive plant species become established and cause severe infestations..."	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 or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	VE58A (R-VE5)	These impacts are overstated, and omit the fact that wind and wildlife play equal or even more significant roles. The RMP needs to incorporate state and local noxious weed control programs and it does not. The failure to do so implies that BLM will not allow or cooperate in noxious weed control efforts. Assuming that the VPA does cooperate on noxious weed control and operators use controls, the assumption of widespread noxious weed infestation ignores the role that wind and wildlife play dissemination. Better enforcement of the reclamation terms and conditions and better coordination with local weed control districts	The BLM does not believe that the potential impacts are overstated and believes they must be disclosed. The section cited in the comment does not specify sources of disturbance but merely states that noxious weeds become established in areas where soil is disturbed and can affect the quality and quantity of forage available to livestock. State and local noxious weeds lists were used to	

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			should be part of the RMP.	<p>create Table 3.16.6, which lists those plants the BLM has targeted for treatment and control. The "Status" column of the table indicates whether the plant is a state or local target species. Additional discussion of the noxious weeds included in the BLM's weed control program is provided in Section 3.16.2. See comment response VE12.</p> <p>The VFO is also an active member of the Uintah Basin Cooperative Weed Management Area, which includes a representative from all adjacent agencies and private land representatives.</p>	
Center for Native Ecosystems	O-38	VE16 (JVE-1)	The RMP has a goal of "Restore or rehabilitate up to 200,000 ac of sagebrush-steppe habitat over the life of the plan." But no map is provided in the RMP as to how to get there.	<p>We presume the reference to the lack of a "map" in the comment relates to a road map or plan and not to a graphic figure. The alternatives in Table 2.1.23 (Vegetation Resources) of the PRMP/FEIS lay out vegetation treatments across alternatives and across resource programs. These various programs, when combined, represent the plan for how the BLM will achieve its sagebrush steppe management goal. The BLM will target sagebrush steppe restoration and rehabilitation when and where it will be the most effective. Identifying specific areas for treatment within the an RMP that will serve for 15-20 years would be inappropriate and would decrease the flexibility the BLM has in achieving its goal. Additionally, the BLM will need to work with other agency and land management partners in developing specific treatments in order to ensure that such efforts are not counteracted by actions on adjacent lands.</p> <p>See comment response VE4.</p>	

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Center for Native Ecosystems	O-38	VE17 (JVE-2)	BLM should develop a noxious weed management plan addressing both the prevention and treatment of infestations, for each ACEC. Noxious weeds should be controlled using methods that minimize surface disturbance and effects on non-target species. All surface disturbances should be avoided to prevent spread and establishment of noxious weeds.	See comment response VE4.	
Center for Native Ecosystems	O-38	VE18 (JVE-3)	The BLM is commended for attempting to incorporate drought measures into the RMP; however, measures should not be voluntary. We understand that the Washington Office of the BLM has issued a drought policy. The prolonged drought and sagebrush die off in the Vernal area should emphasize the need for drought prescriptions in the RMP.	The VFO is committed to following the Washington Office drought policy as it pertains to the VFO drought situation. The grazing regulations that are found in 43 CFR 4110.3-2 (Decreasing permitted use) provide the authority to temporarily suspend grazing use due to drought. Even though the BLM has the authority to decrease permitted use without it being voluntary, the BLM will work with the permittees through coordination, consultation, and cooperation to promote voluntary reductions due to the drought.	
Center for Native Ecosystems	O-38	VE19 (JVE-4)	BLM must limit proliferation of noxious weeds by limiting surface disturbance. Page 3-112 and 3-113 acknowledge that noxious weeds are proliferating in the FO primarily in oil and gas fields and along roadsides, but there seems to be a disconnect between this recognition and the draft plans to open even more land up to surface disturbance and to remove existing protective stipulations from habitat for many special status species. Page 3-113 says cheatgrass infestation has increased and is now a major management concern. But page 4-6 says, "effective implementation of management common to all alternatives designed to minimize spread...would prevent this risk from being significant". We're not sure how that could be, when there is already a significant problem NOW. And RMP will only allow more	See comment response VE4.	

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			opportunity for weeds to take hold.		
Center for Native Ecosystems	O-38	VE20 (JVE-5)	Native plants that are unpalatable to livestock are not noxious weeds. Some of the undesirables are native plants, according to the table itself. It is inappropriate for the BLM to designate native species as undesirable, even if they are unpalatable to livestock.	The native species listed as undesirable in table are species that have long been identified as poisonous plants and control is an appropriate management option. The BLM may initiate control of these species in areas where livestock use is a primary use, the densities of these plants are greater than normal, and control does not negatively affect wildlife or special status species. Currently there are not any areas identified for this type of control.	
Ranges West	O-43	VE12 (AVE-2)	Chapter 2 was a description of proposed actions for each alternative. There appears to be no serious consideration given to an invasive species control program. Yet, noxious and invasive weeds are an increasing problem on public lands.	See comment response VE4.	
Ranges West	O-43	VE13 (AVE-3)	This section is grossly inadequate recognition and discussion of an increasingly serious weed problem. Invasive and exotic plants are a high priority national initiative for land management agencies, yet this Vernal RMP hardly mentions weeds as a problem. Other BLM field offices have developed aggressive weed control and prevention programs.	See comment response VE4.	
Ranges West	O-43	VE15 (AVE-4)	The juniper common to the Vernal Resource Area is Utah juniper (<i>Juniperus utahensis</i>) not western juniper (<i>Juniperus occidentalis</i>). Someone needs to take range plants class.	Section 4.15.1.4 in the PRMP/FEIS has been revised to clarify that the juniper found in the VRA is Utah juniper and not western juniper.	X
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	VE30 (NVE1)	Vehicular impacts on vegetation range from complete denudation of large staging areas to selective kill-off of the most sensitive plants. Ultimately, web-like networks of ORV trails coalesce into broad areas largely denuded of vegetation.	The BLM believes that the restriction of OHV travel to designated existing roads and trails and managed open areas under Alternatives A, B, C, and E (see Table 2.1.22 (Travel—Road and Trails) of the PRMP/FEIS) will result in fewer impacts to special status plants over the term of the RMP as compared to the present condition.	