Public Comments and Responses
Richfield Draft RMP/EIS
August 2008
Sorted by Commentor Name

Commentor	Affiliation	Comment	Comment Summary Response	Category
Adrienne and Dale Haskamp suwa@suwa.org	SUWA	But it seems odd to me, that you would consider opening more areas to these ORVs', when the areas that are already available to them are not patrolled adequatley enough to keep people from driving where they are not supposed to and damaging critical wildlands, and imperiling wildlife and fragile plants as well as desert soils.	Setting of fines and enforcement of RMP decisions are both outside the scope of this NEPA document. Fines are set by the Chief Magistrate Judge for Utah. Enforcement is addressed at the implementation level and determined by funding and resource need.	Recreation
Alan Bailey Alan.G.Bailey@fmr.com		One of the advantages of living in Utah is our access to family access to motorized use. Care needs to be taken on closing open areas that have been used for decades by motorized users. These places are part oh our heritage, and part of our lives. Rules and trails can be established, but to close vast amounts of country to all travel is not acceptable. BLM is multiple use, public land, Keep access open.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Alan Bailey Alan.G.Bailey@fmr.com		Public lands need to remain open for public enjoyment. Trails and access can be limited to protect certain areas, but open trail access needs to be available for all to enjoy. Protecting the environment while allowing motorized access in certain areas is something we can all live with.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Alan Peterson		It is my opinion that your inventory of existing trails in the area around Factory Butte-Caineville is inadequate. I therefore ask that you immediately seek an accurate and complete inventory of the existing roads, trails, routes, vehicular ways, mining traces and other man-made disturbances in the area.	The best available route information was used as a starting point for identifying routes/trails. The route inventory process consisted of applying criteria to the route inventory and involved an interdisciplinary team including BLM, Counties, USFS, State Agencies and other Federal agencies. In addition to the route inventory, routes identified during the public scoping and public comment period were integrated into the baseline route inventory and have been considered in preparing the Proposed RMP/Final EIS.	Transportation
Alex Himes alexhimes@yahoo.com		I enjoy exploring the remote, scenic beauty of the Henry Mountains/Lake Powell/Capitol Reef area in my Jeep. I support the position of the UFWDA for Alternative B of the Richfield Draft RMP. Some of the changes I would especially like to see in Alternative B of the Draft RMP: Special Recreation Permits, Page 2-62 Increase the size of group requiring an SRP to 25 vehicles. It is rediculous to require an organized, non-commercial group of 5 vehicles to apply for an SRP! This is remote country, it is safer to travel in a group.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Alex Himes alexhimes@yahoo.com		Motorized Access to Campsites, Page 2-74. Please allow motorized access to campsites on existing spur roads within 300 feet of designated routes.	The commentor's suggestion is within the range of alternatives considered.	Transportation

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Alex Himes alexhimes@yahoo.com		Existing roads left off Route Inventory Maps: Please add the following existing roads to the Route Inventory Maps of Alternative B- Sams Mesa Routes, Happy Canyon Route, Spur Route at T31s-R15e- on the Dirty Devil 100k map. Connector road east of Bicknell on the Fremont Gorge 100k map. Muddy Creek Route at T27s-R10e, spur road at T27s-R8e, Wood Bench spur road, North Pinto Hills road, Angel Cove road- on the Hanksville 100k map. Connector roads at T27s-R3w, Miners Park Spur roads, connector road at T27s-R3w- on the Sevier River South 100k map.	Data available for routes on Sam's Mesa was analyzed and designated as open or open to 50" or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed within Happy Canyon for consistency with other resource decisions of the RMP. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the proposed plan. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns. Comment lacked specificity to identify Wood Bench Spur Route (T.27 S., R.8 E.). Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) were reassessed. WYNC0017 and 0018 were designated for Administrative Use Only due to resource concerns. Insufficient data was available on route #WYNC0017A. If there is a purpose and need for this route in the future, inventory data would need to be gathered and analyzed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the proposed plan (PTSR0201).	Travel Management – OHV Route Identification
Allan and Thalia Smart		We would like to reiterate our interest in purchasing BLM land adjoining our property in Wayne County. Under Alternatives A and B of the recently released Richfield Field Office Draft Resource Management Plan, the land, identified in Appendix 5 as Wayne County Tract 14a, is recommended for disposal. Tract 14a is an 80-acre parcel, and we are interested only in the eastern half of that parcel. Therefore, by way of this letter, we are requesting that Tract 14a be split into two 40-acre parcels. Our interest, should you grant this request is in the resulting 40-acre parcel with the legal description: T. 29 S., R. 4 E., Sec. 24, NE1/4 NW1/4.	Although this parcel was identified as an 80-acre parcel, the RMP does not restrict land tenure adjustments for any portion of this parcel. Subject to site-specific NEPA analysis, any portion of the parcel may be individually sold.	Lands and Realty
Andrew Blair ablair344@brenan.net		Southern Utah has some of the grandest scenery in all of the United States, if not the world. The BLM should do everything within its power to limit further impacts to air quality. Specifically, they should manage for the impacts to air quality associated with the boom in oil and gas development across this field office. From diesel engines on drill rigs to increased truck traffic on gas field roads. The air belongs to all of us, not just the oil and gas industry.	Emissions calculations have been included in the PRMP/FEIS. In response to concerns regarding air quality the following has been added to Chapter 2 of the Proposed RMP: - BLM will continue to work cooperatively with state, federal, and tribal entities in developing air quality assessment protocols to address cumulative impacts and regional air quality issues. - BLM will continue to work cooperatively with the Utah Airshed Group to manage emissions from wildland and prescribed fire activities. - National Ambient Air Quality Standards are	Air Quality

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			enforced by the Utah Department of Environmental Quality, Division of Air Quality (UDEQ-DAQ), with EPA oversight. Special requirements to reduce potential air quality impacts will be considered on a case-by-case basis in processing land use authorizations. - BLM will utilize BMPs and site specific mitigation measures, when appropriate, based on site specific conditions, to reduce emissions and enhance air quality. Examples of these types of measures can be found in the Four Corners Air Quality Task Force Report of Mitigation Options, November 1, 2007. - Project specific analyses will consider use of quantitative air quality analysis methods (i.e. modeling), when appropriate as determined by BLM, in consultation with state, federal, and tribal entities. If a project is proposed, BLM would require proponents (i.e. APDs) to demonstrate, using appropriate analysis methods, that potential project impacts to air quality are below levels of concern.	
Andrew Blair ablair344@bresnan.net		Areas of Critical Environmental Concern: According to FLPMA protection of wildlife is one of BLM's highest priorities. BLM should utilize the ACEC designation liberally to protect wildlife habitat from degradation due to grazing, oil and gas development, and motorized recreation.	All nominated ACECs were reviewed for R&I values. In accordance with regulation 43 CFR 1610.7-2, to be a potential ACEC, both of the following criteria shall be met: - Relevance: There shall be present a significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or a natural hazard. - Importance: The above described value, resource, system, process, or hazard shall have substantial significance and values. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern. This includes several areas which were nominated for their relict vegetation.	Areas of Critical Environmental Concern
Andrew Blair ablair344@bresnan.net		Vegetation: BLM should utilize ACEC designation to protect sensitive flora as well as protect areas from invasive species.	All nominated ACECs were reviewed for R&I values. In accordance with regulation 43 CFR 1610.7-2, to be a potential ACEC, both of the following criteria shall be met: - Relevance: There shall be present a significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or a natural hazard. - Importance: The above described value, resource, system, process, or hazard shall have substantial significance and values. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern. This includes several areas which were nominated for their relict vegetation.	Areas of Critical Environmental Concern
Andrew Blair ablair344@bresnan.net		Southern Utah has some of the most incredible cultural resources that have been protected for years by its arid climate and remoteness. The increase in motorized recreation puts all of this at risk. The BLM should restrict motorized travel in areas of areas of known cultural resources.	Cultural resources were considered during the route designation process. Managing OHV use largely as limited to designated routes will decrease impacts to cultural resources, which is described in the Draft RMP/EIS chapter 4. Cultural sites are identified and evaluated on a case-by-case basis and mitigation is applied as conditions require.	Cultural Resources
Andrew Blair ablair344@bresnan.net		Cumulative Resources: Southern Utah has some of the most incredible cultural resources that have been protected for years by its arid climate and remoteness. The increase in motorized recreation puts all of this at risk. The BLM should restrict motorized travel in areas of areas of known cultural resources.	Cultural resources were considered during the route designation process. Managing OHV use largely as limited to designated routes will decrease impacts to cultural resources, which is described in the Draft RMP/EIS chapter 4. Cultural sites are identified and evaluated on a case-by-case basis and mitigation is applied as conditions require.	Cultural Resources
Andrew Blair ablair344@bresnan.net		have hiked over a large sections of southern Utah's backcountry. Many is the time that I have walked over acres of sandy soils whose microbiotic crust has been devastated by grazing causing the loss of the	In 1934 the Taylor Grazing Act was enacted to stop the degradation of grazing land. Since 1934 substantial changes have been made to improve the rangeland. Currently, rangelands are evaluated for rangeland health which takes into	Livestock Grazing

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		limited top soil. Many is the time I have visited remote springs to in search of water only to find the spring obscured by cattle trampling, feces and urine. The BLM should revise its grazing practices in this current RMP to manage the range in a sustainable manner instead of the long term practices of over grazing which is leading to the steady degradation of the range for both cattle and wildlife.	account riparian habitat, native plant species and diversity, upland soils and clean water. If it is determined that livestock are causing the problem the BLM implements actions ot mitigate the impact and eliminate the problem.	
Andrew Blair ablair344@bresnan.net		Non-WSA lands with Wilderness Qualities: There are many millions of acres in southern Utah that warrant Wilderness designation but the BLM has chosen to ignore these qualities despite the requirements as laid down by FLPMA. Thus far Utah BLM's Wilderness inventories have fallen far short of acknowledging the vast amount of land with Wilderness qualities within the state. BLM should protect all lands with Wilderness qualities as Wilderness for the protection of wildlife, the non-motorized recreational industry, cultural resources and future generations.	BLM has considered the proposals submitted by several commentors. The Proposed RMP/Final EIS has been revised to address the proposal and the commentors' concerns. The management suggested is included within the range of alternatives considered within the Draft RMP/EIS. IM 2003-275 Change 1 addresses this issue as to why the proposed management is consistent with Federal law.	Non-WSA Lands with Wilderness Characteristics
Andrew Blair ablair344@bresnan.net		Recreation: BLM should strongly regulate motorized recreation by increasing patrols and fines in order to target those that decide the rules are not for them.	Setting of fines and enforcement of RMP decisions are both outside the scope of this NEPA document. Fines are set by the Chief Magistrate Judge for Utah. Enforcement is addressed at the implementation level and determined by funding and resource need.	Recreation
Andrew Blair ablair344@bresnan.net		Socio-economic: BLM should encourage sustainable forms of recreation such as non-motorized recreation over motorized recreation. Recreation is a sustainable form of revenue for the state of Utah whereas extraction is based on boom and bust and can lead to long term degradation of the resource that will impact the recreational economy.	The DRMP/DEIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. BLM believes the preferred alternative adequately protects environmental values while appropriately balancing recreation and extraction activities that support local economies. A discussion of this analysis is provided in section 4.6, Impacts To The Social and Economic Environment. In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Alternative A of the Draft RMP/EIS favors mineral development over protection of resources. Alternative C favors the protection of resources over the extraction of mineral development. Alternative D is the same as Alternative C except it	Recreation

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			includes management of lands with wilderness characteristics to preserve those characteristics. Alternative B is designed to be a balance between mineral development and protection of resources. Table 2.1 in the Richfield DRMP/DEIS provides in comparative form the management actions associated with each alternative.	
Andrew Blair ablair344@bresnan.net		Riparian: BLM should strictly regulate both grazing and ATV use around riparian habitat. Both of these activities in riparian areas lead to decreased water quality, collapsing of stream banks, decreases in stream bank flora and an increase in invasive species.	Livestock grazing is managed according to the Standards for Rangeland Health; Standard #2 spefically states that, "Riparian and wetlands are in properly functioning condition. Stream channel morphology and functions are appropriate to soil type, climate and landform." If this standard is not being met due to livestock grazing, the BLM must take action within one year to rectify the problem. OHV use is limited to desigated routes under all the action alternatives, focusing impacts to areas where mitigation can be directly focused.	Riparian
Andrew Blair ablair344@bresnan.net		Travel Management: Due to the severe impacts related to under-regulated ATV use to cultural sites, riparian zones, lands with wilderness quality, and WSA's BLM should increase regulation on motorized transport by closing sensitive areas to ATV use, increasing patrols and increasing fines. Repeated or intentional violation of regulations should result in confiscation of the machine.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. Enforcement and fines are beyond the scope of this document.	Travel Management – OHV Area Categories
Andrew Blair ablair344@bresnan.net		Visual Resource Management: Fewer places in the US have the visual resources of Southern Utah. BLM should increase its protection for these resources for future generations. Impacts to air quality and under regulated ATV use lead to a degradation of these visual resources.	The Draft RMP/EIS considers a range of alternatives.	Visual Resources
Andrew Blair ablair344@bresnan.net		Wildlife and Fisheries: Protection of fish and wildlife are two of the most important responsibilities of BLM for this and future generations. BLM should strongly regulate and evaluate any potential impacts to fish, wildlife and wildlife habitat. Current regulations are tending to lead to a decrease in available wildlife habitat. BLM should reverse this trend in this upcoming RMP process.	In accordance with BLM HB 1601, BLM identified desired outcomes using BLM strategic plans, state agency strategic plans, and other similar sources and developed management actions and areawide use restrictions needed to achieve desired population and habitat conditions while maintaining a thriving natural ecological balance and multiple-use relationships.	Wildlife and Fish
Andrew Johnson		The BLM should find alternative ways to manage and or protect the land without calling it an area of Land with Wilderness Characteristics.	BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM will not	Non-WSA Lands with Wilderness Characteristics

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			manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	
Andrew Johnson		The land proposed with wilderness characteristics in Alternatives C and D are overboard. Many of these lands have historically used machine built roads, and have historical mining and ranching impacts. I feel the BLM needs to stick with the designations in Alternative B, without adding any more land with Wilderness Characteristics.	BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	Non-WSA Lands with Wilderness Characteristics
Ann MacAdam AnnMacAdam @msn.com		I am opposed to increased oil, gas, coal and mineral mining on Utah's public lands. The destruction of these ecosystems for the profit of a few should not be allowed at the expense of the future enjoyment and experience of these wilderness treasures by the public and future generations. Thank you for your consideration.	In April 2003, the BLM Washington Office (WO) issued an Instruction Memorandum (IM No. 2003-233) which requires the integration of EPCA inventory results in the land use planning process. The IM establishes direction, consistent with FLPMA, to enhance BLM' ability to protect the environment and other resources, as well as facilitates energy development, where appropriate. The IM outlines strategy for integrating the EPCA inventory results into land use plans, restates BLM's commitment to providing responsible and balanced access to the public lands for energy exploration and development; and reinforces BLM's obligation to monitor and adaptively manage public lands and resources. In addition, the development of other minerals and energy resources under the Proposed RMP would allows for the protection of other resources and resource uses where approparite. BLM is committed to providing responsible and balanced energy development while mitigating, minimizing, or eliminating adverse impacts.	Minerals and Energy
Ann MacAdam AnnMacAdam @msn.com		In particular, I support the higher level of 200 AUM's for wild burros under Alternative D. These animals are rare and must be protected in viable numbers. They are small and able to subsist on the native vegetation without significantly compacting the soil, as larger herbivores do. They played an important role in U.S. history and continue to play an important role in the desert ecosystems in which they have become	There are adequate vegetation resources to increase the herd size to 120-200, however, water sources are very limited. There is not enough water to support this range of herd size year round. There are no actions in the RMP that would elimate or transfer acreage or water within the HMA. There are no actions in the RMP that would transfer mangement of the wild horses and burros to other agencies. Livestock grazing on 30% of the Canyonlands HMA has been	Wild Horses and Burros

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		members. To enable the burros to continue to survive, no acreage or water sources should be eliminated from the Canyonlands Herd Management Area. No wild burro range should be transferred to agencies that are not mandated by law to protect wild horses and burros (such as the National Park Service). Big game species should not be a management priority within the Herd Management Areas, as their numbers are so much higher than the burros, and the Herd Management Area is supposed to protect the burros, by law.	relinquished to the Canyonland Trust, with no plans for livestock grazing to occur in these areas. A detailed plan for the Canyonlands burros is outlined in the AML (Appropriate Management Level). There are no plans to give prioirty to wildlife over burros within the HMA; UDWR manages wildlife populations, BLM's authority is to manage burro populations.	
Betsy Skinner	Utah Professional Archaeological Council	The sample of known cultural resources used as baseline data is inadequate and not statistically valid. As stated by Spangler, it is difficult to properly manage cultural resources that are not known to exist. UPAC supports Spangler's recommendations.	The baseline cultural resource data that BLM used in the RMP is the best available at the time of publishing and constitutes BLM's present knowledge of the current cultural resource situation. Since the Section 106 and 110 inventories that have been done make up all of the cultural resource information that presently exists, that is what forms the basis for the Draft RMP/EIS discussion.	Cultural Resources
Betsy Skinner	Utah Professional Archaeological Council	The designation of ORV routes should be accompanied by Section 106 compliance. Although the BLM Instructional Memorandum (IM) No. 2007-030 states that Class III inventory is not required for designation of existing routes, most of these routes were never subjected to Section 106 compliance and thus the cultural resources remain undocumented and effects have never been considered. Although many of the cultural resources have likely already been impacted by ORV activities, the extent of these impacts is not quantifiable because the resources are undocumented. It is unclear whether designation of future ORV routes would require Section 106 compliance. As stated by Spangler, "the BLM cannot manage for and properly protect resources that the agency does not know are there".	BLM policy, as specified in IM-2007-030, states that “Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open.” Proliferation of OHV routes was taken into consideration in the action alternatives by limiting OHV use to designated routes on most of the RFO. Enforcement of laws and RMP policies are dependent on funding levels and staffing and are therefore outside the scope of this NEPA document.	Cultural Resources
Blaine Johnson		I also don't believe in having SRPs limiting groups to 10 vehicles. This is just too limiting to users who want to enjoy a friendly group and have fun. Many people enjoy the experience of going with a group. 10 vehicles is not enough in many instances. I also believe than an SRP for recreating for 2 or more hours is not a good idea in any way, shape, or form.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Blaine Johnson		I believe alternative 'B' is missing some routes that should be included as open motorized routes. These roads are as follows: Dirty Devel 100K (Sams Mesa Routes, Happy Canyon, Spur Route @ T31S R15E); Fremont George 100K (Connector road east of Bicknell); Hanksville 100K (Muddy Creek Route @ T27S R10E, Spur Route @T27S R8E, Wood Bench Spur Route, North Pinto Hills Route, Angel Cove Route); Sevier River Central 100K (Connector roads @T27S R3W, Miners Park spur routes, Connector Route @T27S R3W)	Data available for routes on Sam’s Mesa was analyzed and designated as open or open to 50” or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed within Happy Canyon for consistency with other resource decisions of the RMP. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the preferred alternative. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns.	Travel Management – OHV Route Identification

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			T.27 S., R.8 E., spur route Comment lacked specificity to identify Wood Bench Spur Route. Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) were reassessed. WYNC0017 and 0018 were designated for Administrative Use Only due to resource concerns. Insufficient data was available on route #WYNC0017A. If there is a purpose and need for this route in the future, inventory data would need to be gathered and analyzed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the preferred alternative (PTSR0201).	
Blair Howze blairandglenda @netscape.co m		Please consider the wishes of motorized users when contemplating the travel plan for this awesome area. I'm sure there are ways to keep the traditional motorized access available in this area, especially considering the increasing numbers of motorized recreationists in the USA and their need for areas to explore and marvel at. I would especially like you to consider leaving all current and former RS2477 designated routes available.	As specified in the Draft RMP/DEIS (pg. 1-10), addressing RS 2477 assertions is 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.	Travel Management – OHV Area Categories
Bob Brister		How has new science on climate change in the West been incorporated in this planning process? If the interior west is drying out, you'd want to be extra protective of springs and not allow activities like drillinjg that requires large amounts of water.	While uncertainties remain about global warming and climate change, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.	Scope of Document
Bonnie Mangold bonscello@aol. com		Having further reviewed the three volumes of the Richfield Draft Resource Management Plan, I remain of the opinion that Alternative B does not represent the "balanced approach of protecting and conserving the public land and resources while providing for commodity production and mineral extraction" as stated in the Abstract (Vol. 1). The opening letter to the reader in Vol. I mentions of particular importance feedback concerning adequacy of the five proposed alternatives. I do not believe any of the proposals achieve the mandated balance as quoted above, hence I find them inadequate. Alternatives N, A and B provide little if any protection and conservation, with a heavy emphasis on "commodity production and mineral extraction." Alternatives C and D are unbalanced in the other direction. Alternatives A and D tend to be polar opposites, though D in many instances is closer to middle ground than A. There is	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. The BLM, in developing the PRMP/FEIS, can chose management actions from within the range of the alternatives presented in the DRMP/DEIS and create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple-use mandate.	Adequacy of Analysis and Alternatives

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		no middle ground amongst the proposed alternatives.		
Bonnie Mangold bonscello@aol.com		Cumulative impacts occur from other of the studied activities as well (too many to address in one letter), therefore I believe it foolhardy to emphasize activities that degrade resources over and above preservation of resources. Given that our 'best science' continues to change and evolve (the understanding of wild fires for example), if we err it should be on the side of caution and concern for human and ecological health. As per the Planning Criteria (1.5.2) the BLM must consider "the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity." Alternative B is heavily weighted towards short-term socio-economic values, while neglecting long-term sustainability of both socio-economic and other values, by inadequately protecting resources. The principles of multiple uses and sustained yield must be followed. However there is not a requirement to emphasize utilization above protection, which is the case of Alternatives N, A and B. Alternative D clearly emphasizes protection. Alternative C seems closest to a balanced proposal, but it appears that a truly balanced alternative was not studied. Due to the lack of such an alternative, Alternative C seems the closest to complying with the various laws and mandates of the BLM, hence I believe it to be the best choice.	The CEQ regulations for implementing NEPA (40 CFR 1502.1) require the 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, Question 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified.	Adequacy of Analysis and Alternatives
Bonnie Mangold bonscello@aol.com		Areas of Critical Environmental Concerns (Vol. 3, Appendix 1) The Federal Land Policy and Management Act of 1976 (FLPMA) requires that "In the development and revision of land use plans, the Secretary shall...give priority to the designation and protection of areas of critical environmental concern." (A1-1) Out of 30 nominated ACECs, 26 were evaluated. Sixteen (16) were selected as potential ACECs, having met the criteria. (A1-2,3,5). Only 2 ACECs are designated in Alternative B. This clearly does not fulfill the FLPMA priority mandate, and per the Planning Criteria (1.5.2), the BLM must act consistently with governing law (FLPMA 202b(9)) before attempting consistency with other policies. Only Alternatives C and D fully comply. Where is the balance and adherence to the broadest directives of the law regarding ACECs? It is not in Alternative B.	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection ACEC. The BLM gave full consideration to the designation and preservation ACEC during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period. A total of 27 ACEC nominations were received and the relevance and importance of each were determined. Two of the ACEC nominations were found to meet both the criteria of relevance and importance and all these were included for special management as proposed ACECs in Proposed RMP. The BLM Manual 1613.23 states that “After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM’s proposals for designation and management of ACECs.” The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management	Areas of Critical Environmental Concern

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			prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.	
Bonnie Mangold bonscello@aol.com		Minerals and Energy Resources (Table 6, ES-8) Alternative B leaves open to leasing 79% of the RFO - more than Alt. N, the same as Alt. A. The issues here are ones of pollution, (not mineral and fluid extraction per se), and of a short-term emphasis on fossil fuels to the detriment of development of renewable energy resources. Mineral development inevitably (given technologies currently used) negatively impacts other resources, including as stated in 1-7, "soils, vegetation, water quality, wildlife habitat and naturalness, solitude, and opportunities for primitive or unconfined recreation." (Air quality is missing from this list.) Alternative B fails to protect adequately.	Table 6 on page ES-8 shows in Alternative B that more acres are open to oil and gas leasing, but the acres open to leasing have more constraints. The list of resources on page 1-7 is a partial list of resources that could be impacted by mineral development.	Minerals and Energy
Bonnie Mangold bonscello@aol.com		Renewable Energy (Vol. I, 3.4.5.5) It is stated in this section that "the potential for development of these resources is moderate to low due to distance from roads, transportation facilities, and population centers." Is this distance then not a factor in the development of minerals and fluids, but applicable only to Renewable Energy? Appendix 15 (A15-1) elaborates the minimum Policies and Best Management Practices regarding wind energy. Within these parameters there could still be a balance between the facilitating of fossil fuel extraction versus	The information contained in this section is baseline material included as part of the affected environment. The statements included were quoted from existing reports, including Assessing the Potential for Renewable Energy on Public Lands (USDI and USDOE 2003) and Wind Energy Development, Final Programmatic Environmental Impact Statement (PEIS) (BLM 2005c). There are numerous factors that determine if an area can be leased (see section 3.4.6.1 of the Draft RMP/EIS). Both renewable and non-renewable sources are legitimate uses of public lands. The Draft RMP/EIS discloses how potentially available land for	Minerals and Energy

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		development of renewable energies. Both should be confined to less acreage than the 79% of Alternative B, and both require unswerving monitoring and adherence to guidelines.	leasing was derived. While 79 percent of the Richfield Field Office is open to leasing, this does not imply that 79 percent of the Field Office would be leased or have oil and gas development. Any authorization would be monitored for compliance with the regulations and the approval in conformance with BLM policy.	
Bonnie Mangold bonscello@aol.com		Impacts from Minerals and Energy (Volume II, 4-5) Virtually all the conclusions state that impacts from extraction would be "minor." I did not find a definition of "minor" in the short-term discussions in 4.3.1., nor in the glossary, nor in the cumulative impact section 4.7.4.1. These cumulative impacts are considered to be "minimal to negligible." This is based on certain assumptions - assumptions of strict application of, and adherence to, regulations - which in reality are never realized. There are too many vague regulations, exceptions, "best efforts" and accidents. In fact, there will be pollutants, and it is just a question of time before the build-up adversely impacts individual human health, via air, water, soil, vegetation, animals, etc. That an area may currently have relatively clean air or water is not a reason to dismiss as insignificant on-going and increasing pollution with its eventual degrading of 'resource' quality to the poor levels found elsewhere. (We should never lose sight of the fact that three resources - water, air and food - are necessities, not options.) There are no safe levels of pollutants. We know for example that mercury in the body is unsafe at any level (speaking as one who suffers from mercury toxicity). Science has not yet caught up with all the subtle interactions between the human body and various chemicals, metals, gases. How much nitrogen oxide, sulfur dioxide, volatile organic compounds, etc. are truly safe when combined with all the other toxins we are exposed to? We do not know the answers, in part because each human being is unique. Polluting activities of every kind must be held to higher standards than now exist. Until that occurs, it is not sound planning to permit! extraction, with its consequent degradation of resources, on as much as 79% of the acreage involved. As stated in 4.2.2 "Cumulative impacts can" (and do) "result from individually minor, but collectively significant, actions taking place over a period of time."	The Draft RMP/EIS discloses that mineral energy extraction/uses impact resources resources (ES-7 and section 4.4.6). In addition, best management practices would be applied to oil and gas activity to minimize impacts to resources and resource uses.	Minerals and Energy
Bonnie Mangold bonscello@aol.com		Visual Resources (Table 1, ES-3) Alternative B protects a mere 21% of acreage as VRM Class 1 and leaves 50% open to major modification of the landscape. This seems inappropriate for an area containing some of the most stunning visual resources in the world. This past year there were over 600,000 visitors to Capitol Reef National Park alone. The vast majority of Wayne County businesses benefit from these tourists, not to mention the taxes collected. These visitors do not come to see "modified landscapes," eroded land or dirty air. Currently this is a key socio-economic resource for the area, one with increasing long-term potential.	The Draft RMP/EIS considers a range of alternatives.	Visual Resources
bonnie nelson		One of our most forgettable experiences was camping on the Henry Mts.	The BLM analyzed the impacts of travel management as outlined and described	Travel

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suwa@suwa.org		Just as I was preparing dinner on a lovely spring evening, our quiet was destroyed by a group of ATV's storming up the road, then returning, then continuing up and down for nearly two hours. The dust destroyed the dinner, the noise destroyed our peace. We left. Please, please consider saving areas for those of us who want to quietly enjoy the natural beauty of Utah.	in Chapter 4 of the DRMP/DEIS. Congress recognized that, through the multiple-use mandate, there would be conflicting uses and impacts on the public land. Also, specific decibel limitations on motorized vehicles are under the jurisdiction of the Environmental Protection Agency, and a matter of State Law. As stated in 43 CFR 8343.1(b): "No off-road vehicle equipped with a muffler cutout bypass, or similar device, or producing excessive noise exceeding Environmental Protection Agency standards, when established, may be operated on public lands."	Management – OHV Area Categories
Brett Matthews	U4WDA	I do not believe that the BLM should create artifical Wilderness Study Areas. This should only be done by an Act of Congress.I The BLM should find alternative management to protect the lands. Other than just closing the land of to the public.	BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	Non-WSA Lands with Wilderness Characteristics
Brett Matthews	U4WDA	Another area that I would like to make a point on. The idea is the SRP's of limiting travel groups to a total of 9 vehicles is to low. By requiring groups of 10 vehicles/20 persons to have to request a SRP is a bit much. I've had many camping trips with 15 vehicles or more. Having to acquire a permit for a family outting is not something anyone should have to do. I believe that increasing the requirement to 25 vehicles or 50 people is a more realistic requirement. This would more likely include larger clubs and outdoor groups instead of family or friend outtings.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Brett Matthews	U4WDA	I also believe that the BLM should include the Open Areas from Plan A into Plan B. I believe that in the end this would keep users from straying off of established trails in the future. It is important that these areas be included for the use of the public. These areas should include such as sand dunes, gravel pits, etc.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Brian Hawthorne	Blueribbon Coalition	Thus, BLM would appear to argue, the "Non WSA Lands with Wilderness Character" designation is legal and consistent with FLPMA and other laws. However, as Richfield BLM's DEIS clearly indicates, the purpose of this effort concerns the inventory, review and management of	BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section	Non-WSA Lands with Wilderness Characteristics

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		BLM lands for potential inclusion in the National Wilderness Preservation System. Indeed, this process began during a Congressional hearing regarding a proposed Utah Wilderness bill. The agency itself relied upon that Congressional hearing to undertake a statewide Wilderness re-inventory. The inventory was briefly suspended by the federal courts, but once the inventory was completed, the agency then began a statewide planning process to establish new WSAs.	constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs. Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA § 603 and required to be managed under § 603's non-impairment standard, and other lands that fall within the discretionary FLMPA § 202 land management process. See also IM 2003-275.	
Brian Hawthorne	Blueribbon Coalition	There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the "603 Process" was completed, the agency is done. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so is a tragic loss of management resources.	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District	Non-WSA Lands with Wilderness Characteristics

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			Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	
Brian Hawthorne	Blueribbon Coalition	Secretary Babbitt stated that his re-inventory team "is explicitly instructed to apply the same legal criteria that used in the original inventory." The re-inventory procedures document clearly shows that was not done. The "Utah Wilderness Review Procedures" adopts some of the guidelines and requirements laid out in the original WIH and the Organic Act Directives (DAD's). The Interior Department maintains that the reinventory procedures are the same as the previous ones, thereby fulfilling Secretary Babbitt's commitment to the Utah's Congressional Delegation that the re-inventory team "is explicitly instructed to apply the same legal criteria that were used in the original inventory" to his re-inventory effort. However, the "Utah Wilderness Review Procedures" selectively adopts certain paragraphs and sentences from the original documents and even then often changing their arrangement or dropping and adding sentences. Secretary Babbitt had in fact created in the "Utah Wilderness Review Procedures" a new document without any public involvement or opportunity for review and comment.	BLM followed the criteria outlined in the Wilderness Act and IM 2003-274 and IM 2003-275 to define whether an area has wilderness characteristics. Inventories conducted post-2004 applied current policy, which is defined in IM 2003-275, Change 1.	Non-WSA Lands with Wilderness Characteristics
Brian Hawthorne	Blueribbon Coalition	Clearly, the re-inventory document has a much lower threshold for what qualifies as "natural" than the one applied in the original inventory.	BLM followed the criteria outlined in the Wilderness Act and IM 2003-274 and IM 2003-275 to define whether an area has wilderness characteristics. Inventories conducted post-2004 applied current policy, which is defined in IM 2003-275, Change 1.	Non-WSA Lands with Wilderness Characteristics
Brian Hawthorne	Blueribbon Coalition	BRC is not comfortable that the BLM can successfully adopt a programmatic RMP simultaneously with a project-level Travel Plan of the detail and complexity attempted here.	The decision to combine the programmatic RMP with the project level travel plan is within the authority of the BLM.	Process and Procedures
Brian Hawthorne	Blueribbon Coalition	The agency and public are unable to fully, if at all, utilize appropriate "tiering" in the planning process. The programmatic RMP and the site-specific Travel Plan are both "moving pieces" of the same puzzle and there is no refinement (in the Travel Plan) that can occur through subsequent reflection on the RMP. Similarly lost are any benefits that might attend "amendment" of a programmatic RMP through a subsequent and more focused Travel Planning process that is procedurally distinct from RMP generation.	The decisions are two separate decisions. The public has provided input on both the planning and implementation decisions. Route designations are implementation decisions that are subject to change based upon future site-specific environmental analysis. Page 3-70 of the Draft RMP/EIS further describes the route designation process..	Process and Procedures
Brian Hawthorne	Blueribbon Coalition	In fact, although the original Wilderness Inventory Handbook acknowledged the importance of public involvement when inventorying for Wilderness characteristics, the 1999 Wilderness inventory criteria and procedures went out of its way to eliminate public involvement.	The 1999 Wilderness inventory is outside the scope of the Richfield RMP.	Process and Procedures
Brian Hawthorne	Blueribbon Coalition	BLM should not assume that just because an Alternative has more commodity production it should have less non-motorized recreation. BLM should not assume that just because an Alternative has more non-motorized recreation it should have less motorized recreation. These assumptions limit management options, and totally preclude an	The range of alternatives provides for a wide selection of motorized and non-motorized uses for consideration.	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Alternative that would maximize all resource uses while protecting the environment.		
Brian Hawthorne	Blueribbon Coalition	Big Rocks p. 2-49 and 2-50. Also, we were disappointed not to see reference to permitted events. The Big Rocks is an appropriate area for certain permitted events, such as paint ball contests, Observed Trials and Boy Scout activities. Please consider including some direction that allows or even encourages permitted events in this area.	These activities referenced by the commentor are implementation level permitted activities that would be considered on a case-by-case basis.	Recreation
Brian Hawthorne	Blueribbon Coalition	There is a fundamental incongruity in the DEIS and Alternative D. The incongruity is this: The inventory criteria allows motorized recreation (and other non-confirming uses) but the management prescriptions categorically exclude motorized recreation (and other non-conforming uses). Is that not the definition of arbitrary and capricious?	The range of alternatives provides for a wide selection of motorized and non-motorized uses for consideration.	Recreation
Brian Hawthorne	Blueribbon Coalition	There are other examples where our concern can be amplified. One is in table 2-16, which states: • Where long-term damage by recreational usage is observed or anticipated, limit or control activities through special management tools such as designated campsites, permits, area closures, and limitations on numbers of users and duration of usage. It is possible we missed it, but we could not find a definition of "long-term damage." This is just one example of the importance of reviewing the FEIS and Final Plan for undefined terms or subjective language. The BLM must clearly state what it intends to do in the ROD or else it will leave the agency open to lawsuits by special interests attempting to define the terms - on their own terms.	"Long-term" is defined in the Draft RMP/EIS in section 4.2.2.	Transportation
Brian Hawthorne	Blueribbon Coalition	One other point related to this is that the BLM's Draft Travel Plans do not contain references to agency guidance on route classification. The DEIS and Travel Plan do not specify if a route is a Road, a Trail or a Primitive Road pursuant to agency directives. This seems to be inconsistent with agency guidance.	The term "route" is preferred by the BLM and has been used throughout the document. In many instances, the use of terms "road" and "trail" are in reference to regulations or policies that utilize the specific term. The BLM will carefully review the text of the PRMP/FEIS to clarify any misuse of terms. Route maps will be labeled as to the type of vehicles that are allowed.	Travel Management – OHV Route Identification
Brian Hoth bbhoth@yahoo.com		I oppose any restriction being considered that would reduce motorized access to these areas in this management plan. Significant dollars are poured into this area due to many visitors from throughout the United States. The economy in the entire state of Utah will be effected. Please don't fall prey to the extreme environmentalists who claim our state is being destroyed by off road use.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Brian Passey		I also believe that the BLM should not create artificial wilderness by designating it as a Land with Wilderness Characteristics. There should be other ways to manage and protect the land without giving it a WC designation. Some of the areas in question have historically used machine built roads. Some have historical ranch and mining impacts. I feel the BLM should stick with designations stated in ALT B.	BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use	Non-WSA Lands with Wilderness Characteristics

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			of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . .” FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	
Brian Passey		The idea of limiting the number of vehicles to 10 before needing a permit sounds unrealistic, I feel it should be a higher number maybe closer to 25 vehicles and 50 people. I also don't feel the SRP should be required to recreate in an area for more than 2 hours.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Brian Swanson		Table 2-22 lists the five alternatives to the Fremont Gorge/Cockscomb potential A.C.E.C. I am unable to find data used to formulate the alternatives. The documents presented outline how the decisions are to be arrived at. Sufficient data to be used in these outlines is not to be found within this draft.	Information associated with the process used for evaluating nominations for ACEC is included in the Draft RMP/EIS in Appendix 1. Full documenation of the process is included in the ACEC Evaluation Report, Richfield Resource Management Plan, January 2005. This report was made available to the public, and is readily available for viewing by the public at Richfield Field Office and on the Richfield RMP planning website.	Areas of Critical Environmental Concern
Bruce Davidson bruce_davidson @comcast.net		Lands with Wilderness Characteristics The BLM should not create artificial wilderness by designating it as a Land with Wilderness Characteristic area. I believe the BLM should seek out alternate methods to manage and protect the land, without giving it a Wilderness Characteristic designation. The currently proposed Wilderness Characteristic lands Alternatives C & D are overkill. Many of these areas have historically used mechanically built roads. Some of these areas also have historical ranching and mining impacts. I feel the BLM should stick to the designations made in Alternative B, and not add any additional Land with Wilderness Characteristics.	BLM’s authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM’s organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary’s authority to manage lands as necessary to “achieve integrated consideration of physical, biological, economic, and other sciences.” FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . .” FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	Non-WSA Lands with Wilderness Characteristics
Bruce Davidson bruce_davidson @comcast.net		Special Recreation Management Areas I don't believe the BLM should close any existing routes within the SRMA’s proposed in Alternative B. Also, I believe any SRMA’s that are designated should have an	SRMAs can be identified to manage for a variety of recreation users and settings, which can include motorized use and non-motorized use. SRMAs do not automatically close routes. Decisions regarding OHV use within SRMAs were	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		emphasis on motorized recreation. More camping and OHV opportunities should be created in the SRMA's.	made to support the recreation setting and opportunities desired for the SRMA by alternative.	
Bruce Davidson bruce_davidson @comcast.net		Special Recreation Permits I don't believe that group sizes should be limited to 10 vehicles under the proposed Criteria for Special Recreation Permits. This number is unrealistic and makes group events such as family picnics or scouting events impossible. In addition, I don't believe an SRP should be required to recreate in an area for two or more hours, not only would this be unenforceable, it just isn't practical. I also believe the rules and authorized exceptions for theses SRP's should be clarified and added to Alternative B.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Bruce Davidson bruce_davidson @comcast.net		Motorized Access to Campsites The BLM should allow vehicles to access campsites via existing spur roads within 300 feet of the designated routes. Camp sites should not have to be "designated" to allow camping. Camping only in designated sites is just too restrictive and spoils much of the "outdoor" experience.	The management suggested within the comment was included within the range of alternatives. Many routes which provide access to campsites have been identified and would be designated routes. Appendix 9 provides criteria to consider the addition of designated routes in future if necessary to better address resources and resource use conflicts.	Recreation
Bruce Davidson bruce_davidson @comcast.net		I am a resident of Utah and enjoy a variety of activities (Camping, Hunting, 4 Wheeling Etc.) in the Richfield area. My family and I have been visiting the Richfield area since I was a child and I am writing this letter to voice my opinion on the upcoming RMP decision. It is very important to me and my family that there continue to be adequate motorized recreation opportunities in the Richfield area. I have spent time hunting near Salina, 4 Wheeling and camping around Mount Pleasant, Salina, Richfield, Capitol Reef, Hanksville and the Henry Mountains and many other places in the area. The point is that we visit the area often and enjoy it always using a motorized vehicle of some sort. I believe that Alternative B, with some minor changes, is the best choice. I would also like to voice my support for the comments and insight provided by the Utah 4 Wheel Drive Association.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Bruce Davidson bruce_davidson @comcast.net		Managed Open Areas The BLM should adopt many of the managed open areas outlined in Alternative A, and include them into Alternative B. I feel it is important that OHV users have access to open travel areas. In my opinion areas like these keep users from later leaving the trails in designated travel areas. I would hope the BLM would consider adding these to the final decision.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Bruce Davidson bruce_davidson @comcast.net		Transportation Alternative B is missing several historically accessed routes. The Utah 4 Wheel Drive Association (U4WDA) has brought all of these routes to your attention. They should be added to Alternative B as open motorized routes. Also, the BLM should recognize the RS2477 road claims that are part of Sanpete, Sevier, Piute, Garfield and Wayne County Transportations Plans. The validity of these claims should be determined before a final decision is made in this RMP. Sanpete, Sevier, Piute, Garfield and Wayne Counties should be consulted regarding all road decisions prior to finalizing the RMP. The following routes should	As specified in the Draft RMP/DEIS (pg. 1-10), addressing RS 2477 assertions is 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. Data available for routes on Sam's Mesa was analyzed and designated as open or open to 50" or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed within Happy Canyon for consistency with other resource decisions of the RMP. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
		remain open and amended to Alternative B: Trail Name or Location Located on Map: Sams Mesa Routes, Dirty Devil 100k Happy Canyon Route, Dirty Devil 100k Spur Route at T31S-R15E, Dirty Devil 100k Connector road east of Bicknell, Fremont George 100k Muddy Creek Route at T27S-R10E, Hanksville 100k Spur route at T27S-R8E, Hanksville 100k Wood Bench Spur Route, Hanksville 100k North Pinto Hills Route, Hanksville 100k Angel Cove Route, Hanksville 100k Connector roads at T27S-R3W, Sevier River Central 100k Miners Park spur routes, Sevier River South 100k Connector Route at T27S-R3W, Sevier River South 100k Bruce Davidson 921 East 510 North Pleasant Grove, UT 84062	area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the preferred alternative. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns. T.27 S., R.8 E., spur route Comment lacked specificity to identify Wood Bench Spur Route. Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) were reassessed. WYNC0017 and 0018 were designated for Administrative Use Only due to resource concerns. Insufficient data was available on route #WYNC0017A. If there is a purpose and need for this route in the future, inventory data would need to be gathered and analyzed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the preferred alternative (PTSR0201).	
Bruce Davidson bruce_davidson @comcast.net		Wilderness Study Area Management I don't believe that any additional routes should be closed in currently designated WSA's. If these routes are currently open, they should remain open. Access to these WSA's is already severely restricted and I don't believe that it should be further limited.	A range of alternatives considered a number of options for the inventoried ways in WSAs.	Wilderness Study Areas
Bruce Willock BHW2@AOL.C OM		This letter is written to request the BLM revise its Richfield Draft Resource Mgmt Plan in order to the reduce the anticipated impact of ORVs.	The Travel Section in Chapter 3 of the DRMP/DEIS presents the baseline (current situation) for analysis in Chapter 4. It discusses the ongoing and baseline issues surrounding cross-country travel that is currently permitted by the existing land use plan for the Field Office. The planning area was inventoried as having 4,315 miles of non-paved routes. This number represents the baseline for analysis, however, it is also recognized that cross-country travel is currently allowed in many other areas within the Field Office. The impacts associated with cross-country OHV use are described in Chapter 4 under the No Action Alternative. The action alternatives limit travel to designated routes. The routes that are already in use are considered part of the baseline, and therefore, it is not reasonable to consider the impacts to vegetation from these already disturbed linear surfaces. However, the impacts from the current situation are considered in the cumulative analysis.	Travel Management – OHV Area Categories
Bryan Carter	USFS-Fishlake National Forest	Abes Knoll Quad T.26S. R.IE. Sec. 27, Route# SEGV0055 (all alternatives): this proposal is inconsistent with the Fishlake National Forest Motorized Travel Plan (MTP). The Forest Service has identified this route as open to all motorized vehicles with no seasonal restrictions. I propose to manage this route consistently with the FS designation.	Route #SEGV0055 was reviewed and adjustments made for consistency with the Fishlake National Forest MTP. This would also adjust Route #SEGV0057.	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
Bryan Carter	USFS-Fishlake National Forest	Abes Knoll Quad T.26S. R.IE. Sec. 1.7, Trail with no number (all alternatives): this proposal is inconsistent with the Fishlake National Forest Motorized Travel Plan (MTP). The Forest Service has identified this route as open to all motorized vehicles with no seasonal restrictions. I propose to manage this route consistently with the FS designation.	This is Route SEGV0057. Route #SEGV0057 was reviewed and adjustments made for consistency with the Fishlake National Forest MTP.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Angle Quad T.30S. RIW. Sec. 20, 29, 30 (all alternatives): there are several routes in this area that exist on the ground but are not shown on any Bureau RMP maps. One route provides access top a couple BLM managed reservoirs and an overlook. The combination oftwo additional routes provides an important loop route from the town ofAntimony and Otter Creek Reservoir (see attached map). I would like to propose the addition ofthese routes as limited to 50 inches or less and with no seasonal restriction.	PTGV0005a - Connector route between PTGV0005a and 0007 was GPS'd in the inventory but inadvertently missing from the published maps. PTGV0005a has been extended to connect with 0007. PTGV0007 - Connector route between PTGV0007 and 0007a was GPS'd in the inventory but inadvertently missing from the published maps. PTGV0007 has been extended to connect with 0007a. The comment regarding 50 inches or less on Routes PTGV0007 and PTGV0005a are valid due to existing uses and conditions. Portions of those routes have been adjusted accordingly.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Angle Quad T.30S. R.2W. Sec. 9, 15, 16, Route# PTGV0047 (all alternatives): this route should be restricted to vehicles 50 inches or less with no seasonal restrictions. The alternative maps do not distinguish between seasonal closures and size limitations.	PTGV0029A and PTGV0047 (Piute Trail #73 and 61) are limited by size, 50" or less with no seasonal restrictions.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Angle Quad T.29S. R.2W. Sec. 21 & 22, Route# PTGV0081 (all alternatives): this proposal is inconsistent with the Fishlake National Forest MTP. The Forest Service has identified this route as open to all motorized vehicles with no seasonal restrictions. I propose to manage this route consistently with the FS designation.	During review, we found Route PTGV0081 to connect with a hiking/equestrian trail. No changes were made to PTGV0081.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Angle North Quad T.29S. R.2W. Sec. 2,10,11 (all alternatives): there is an ATV trail through this area that is not showing on the Bureau maps. The trail provides an important connection between Pine and Rock Canyons (see attached map). The route needs to be added to the proposal and shown as open to vehicles less than 50" wide with no seasonal restrictions.	Commentor is correct, inventory data was located and added to route designations. Management considerations of a 50" or less route on BLM would be difficult to enforce or maintain due to the open topography and vegetation.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Angle North Quad T.29S. R.2W. Sec. 10, 14, 15, Route# PTGV0080 & PTGV0080a (all alternatives): this proposal is inconsistent with the Fishlake National Forest MTP. The FS does not have seasonal restrictions on this route but does limit the route to vehicles less than 50 inches wide. I propose to manage this route consistently with the FS designation by leaving the road open to full size vehicles to the campsites in Section 10 then restricting to vehicles less than 50 inches wide west of this location.	The comment regarding PTGV0080 50" or less was considered and has been adjusted for consistency from the campsites on BLM land to the FS boundary. PTGV0080A is identified as 50" or less. The seasonal restriction was also considered and changed to open for consistency with the FS.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Angle North Quad T.28S. R.2.W. Sec. 26, Route# PTGV0118 & PTGV0120 (all alternatives): this proposal is inconsistent with the Fishlake National Forest MTP. The route is a main access road to Pine Canyon on the Fishlake. The FS has this road open for public access with no restrictions. I propose to manage this route consistently with the FS designation.	Route #PTGV0120 is the main access from Highway 62 to the Forest. It has been re-evaluated and identified as open with no restrictions for consistency.	Travel Management – OHV Route Identification
Bryan Carter	USFS-	Angle North Quad T.28S. R.2W. Sec. 27,34, Route# PTGV0119 &	Neither of these routes were shown on the FS route designation map. No	Travel

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Fishlake National Forest	PTGV0112 (all alternatives): this proposal is inconsistent with the Fishlake National Forest MTP. The Forest Service has these routes closed at the FS boundary and they should be removed from the BLM map at this point.	changes were made.	Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Antimony Quad T.31S. R.IW. Sec. 31, Route# GAGV0048 (alt. C & D): this proposal is in conflict with previous NEPA identifying the route as open for ATV use under the Motorized Event Environmental Analysis and for the Rocky Mountain ATV Jamboree.	This route is identified as open in the Proposed Plan.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Antimony Quad T.32S. R.IW. Sec. 6, Route# GAGV0045 (alt. C & D): this proposal is in conflict with previous NEPA identifying the route as open for ATV use under the Motorized Event Environmental Analysis and for the Rocky Mountain ATV Jamboree.	Previous NEPA opened these routes; Alternatives C and D have been corrected to reflect these designations.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Beehive Peak Quad T.21S. R.2W. Sec. 15,22, Route# SESR0802 (all alternatives): this proposal is inconsistent with the Fishlake National Forest MTP. The FS has this route designated as open with no restrictions. This is the main Paiute 01 Trail and should be designated as open with no restrictions. Placing a seasonal restriction on a short section of this route creates a disconnect for the entire trail.	Commentor is correct, SESR0802 has been changed to open with no restrictions. During review, it was determined that SESR0672 (also a portion of Paiute 01 Trail) was inadvertently closed and has been adjusted.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Beehive Peak Quad T.22S. R.2W. Sec. 11, Route# SESR0662 (all alternatives): this proposal is inconsistent with the Fishlake National Forest MTP. The FS has this route designated as closed.	Commentor is correct, SESR0662 has been changed to closed for consistency.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Beehive Peak Quad T.22S. R2W. Sec. 11, Route# SESR0655 (all alternatives): this proposal is inconsistent with the Fishlake National Forest MTP. The FS has this route designated as open to vehicles less than 50 inches wide. The route provides access to additional FS trails. I propose to manage the route consistent with the FS designation.	Commentor is correct, SESR0655 has been changed to open with restriction of 50" or less for consistency.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Burrville Quad T.26S. R.IW. Sec. 13, Route# SEGV0079 (all alternatives): the proposal creates a disconnect on the main Paiute trail. This route is the Paiute Oland by seasonally restricting this short (less than a tenth of a mile) section the entire trail through the area becomes disconnected for use. I propose to manage the route as open with no restrictions.	Commentor is correct, SEGV0079 is part of the Paiute 01 route and a County maintained road. Adjustments have been made to identify this route as open with no restrictions.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Circleville Quad T30S. R.4W. Sec. 28, Route# PTSR0009 & PTSR0012 (all alternatives): this proposal is inconsistent with the Fishlake National Forest MTP. The Forest Service has these routes closed at the FS boundary and they should be removed from the BLM map at this point.	The commenter is correct and adjustments have been made in the Final RMP-EIS.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Deep Creek Quad T31S. R.2W. Sec. 4-9, Route# GAGV0074 (alternative D): this proposal is in conflict with Forest Service management. The route provides the only access to Table Mountain and the FS wants this route open for public access.	This route is a identified in the FAMS system as a BLM maintained route and is on Garfield County's ATV trail map. It was analyzed as closed in Alternative D, but is proposed as open in the preferred alternative.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake	Golden Throne Quad T.30S. R6E. Sec. 27, 34, 35, Route# WYPM0530 (alt. C & D): this proposal is in conflict with Forest Service management.	Commentor is correct that WYPM0530 provides access to FS and is identified as open with seasonal restrictions in the preferred alternative.	Travel Management –

Commentor	Affiliation	Comment	Comment Summary Response	Category
	National Forest	It provides access to Tantalus Flat and should remain open. The Route is also part ofthe Garfield County Trails designation as a loop route.		OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Grover Quad T.30S. R.6E. Sec. 19, 20, 28, Route# WYPM0529 (alt. C & D): this proposal is in conflict with Forest Service management. It is a connector route between FS parcels providing access to FS lands and should remain open. The Route is also part ofthe Garfield County Trails designation as a loop route.	Commentor is correct that WYPM0529 provides access to FS and is identified as open with seasonal restrictions in the preferred alternative.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Marysvale Quad T.27S. R.4W. Sec. 1, Route# PTSR0580 (all alternatives): this proposal is in conflict with Forest Service management. The FS has this route open with no restrictions. I recommend this route to be open in conjunction with the FS route to provide a loop with route #PTSR0584.	PTSR0580 was reassessed and identified as open for consistency with FS and to create loop.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Marysvale Quad T.28S. R.3W. Sec. 5, Route# PTSR0261 (all alternatives): this proposal is in conflict with Forest Service management. The FS has this route open with no restrictions. The proposal is also in conflict with previous NEPA identifying this route as open to ATV use for the Rocky Mountain ATV Jamboree. I recommend the route be left open with no restrictions.	PTSR0261 was reassessed and identified as open with seasonal limitations for consistency with other FS and BLM route designations.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Marysvale Quad T.27S. R.4W. Sec. 13,14, Route# PTSR0304, PTSR0305 (all alternatives): the proposal is in conflict with previous decisions. This is a County road, maintained by the County and is also identified to be open for ATV use under the EA for the Rocky Mountain ATV Jamboree.	PTSR0305 has been physically closed by a fence and berms. It was re-analyzed and would remain closed. PTSR0304 was analyzed and was identified as open.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Phonolite Hill Quad T.30S. R.2W. Sec. 6, 7, 8,17 & 18 (all alternatives): the Hickman (Trail 73) and Lizard (Trail 61) trails on the Paiute ATV Trail system. They are narrow rough trails that should be designated as open to vehicles 50" or less and with no seasonal restrictions. Seasonally restricting these trails will impact Otter Creek State Park by causing lost revenue. Many people use these trails in the late winter and spring as part of a vacation fishing/riding trip. These trails are accessible and used mostly at the time of year the seasonal restrictions would be imposed.	PTGV0029A and PTGV0047 (Piute Trail #73 and 61) are limited by size, 50” or less with no seasonal restrictions.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Paiute Reservoir Quad T.28S. R.3W. Sec. 12, Route# PTSR0261 (all alternatives): the proposal is in conflict with previous NEPA identifying this route open to ATV use for the Rocky Mountain ATV Jamboree.	PTSRO261 was reassessed and identified as open with seasonal limitations for consistency with other USFS and BLM route designations.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Rex Reservoir Quad T.23S. R.IW. Sec. 11, Route# SESR0491 (all alternatives): the proposal is in conflict with previous NEPA identifying this route open to ATV use for the Rocky Mountain ATV Jamboree.	Previous NEPA authorized use of this route. The data has been corrected to identify this route as open with 50" or less size restriction.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Rex Reservoir Quad T.23S. R.IW. Sec. 7, 18.19, Route# SESR0431, SESR0431a, SESR0433 (alt. C & D): the proposal is in conflict with previous NEPA identifying this route open to ATV use for the Rocky Mountain ATV Jamboree.	Previous NEPA authorized these routes. These routes are identified as open in the preferred alternative.	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
Bryan Carter	USFS-Fishlake National Forest	Rex Reservoir Quad T.23S. R.2W. Sec. 24 & 25, Route# SESR0384, SESR0428 (alt. C & D): the proposal is in conflict with previous NEPA identifying this route open to ATV use for the Rocky Mountain ATV Jamboree.	SESR0384 is identified as a County maintained road. Previous NEPA authorized the use of SESR0428. These routes are identified as open in the Proposed Plan.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Water Creek Canyon Quad T.24S. R2W. Sec. 12, Route# SESR0317 (all alternatives): this route is Paiute Trail 40. For some reason the actual trail as it continues down the drainage south and west ofthe junction with route# SESR0318 has inadvertently been left off the map. This route was GPSed and NEPA was completed on the project. The NEPA document is EA # J-050-2004-005. The route also has a right-of-way #UTU-80714 expiring in 2034. This route should be shown as open to vehicles less than 50" in width with no seasonal restrictions.	This was corrected in the Final RMP EIS. Paiute Trail #40 was being constructed during BLM inventory meetings. It was addressed as Route SESR0317 but data was not shown on DRMP route maps. This has been resolved.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Water Creek Canyon Quad T~24S. R.IW. Sec. 19, Route# SESR0344a (all alternatives): this proposal is in conflict with Forest Service management. The FS has this route open with no restrictions. I recommend consistency with FS management.	This route has been reviewed and is not shown on the FS travel map. This route is currently blocked on BLM land prior to entering the Forest. It has been identified for Administrative access only.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Willow Springs Quad T.25S. R.4E. Sec. 5 & 6, Route# SEFJ0042 (all alternatives): the proposal is in conflict with the Fishlake National Forest Travel Plan. The Forest Service has closed this route to protect sensitive plant habitat. I recommend closing this route to be consistent with FS management.	The westerly portion of SEFJ0042 can not be accessed due to the FS route which is closed. The data has been adjusted to closed for consistency.	Travel Management – OHV Route Identification
Bryan Carter	USFS-Fishlake National Forest	Willow Springs Quad T.24S. R.4E. Sec 19 & 30, Route# SEFJ0055 & SEFJ0064 (all alternatives): this proposal is in conflict with Forest Service management. The FS has these routes open with no restrictions. I recommend consistency with FS management.	Comment is accepted. This creates a loop that should be managed for consistency with FS as open with no restrictions.	Travel Management – OHV Route Identification
C. Robert Mulford bobmulford@gmail.com		It is our understanding that there is a proposal study to declare some 4000 acres in the Wayne County area to become as wilderness or sold to the public or left as is. We are more particulary concerned about the property in the Torrey, Grover, Capitol Reef, Miners Mtn. area. We are definitely NOT in favor of a checker board type wilderness area surrounding us and other private property owners. It is already difficult enough with livestock, sportsmen, etc. We would much rather the ground remain as is-multiple use. Grazing, wood hauling, and the possiblilty of mineral and oil exploration should not be hindered o stopped by a wilderness mandate.	There are no non-WSA lands with wilderness characteristics identified in Wayne County for disposal. Managing for wilderness characteristics is a multiple-use which was considered and analyzed along with all other resources in the Draft RMP/EIS. Within the PRMP/FEIS, no non-WSA lands in the area identified by the commentor would receive specific management of wilderness characteristics.	Non-WSA Lands with Wilderness Characteristics
Carl Albrecht	Garkane Energy Cooperative, Inc.	Map 2-29, Alternative N: Existing Lines: This plan shows avoidance areas that could affect our current lines on both sides of Highway 24 west of Torrey, northeast of Torrey in the Rimrock area, possibly in the Fish Creek Cove area, and along Highway 24 north of the Notom turn off road. Future Lines: There would be come problems if a line to Ticaboo or Bullfrog was constructed in dealing with avoidance and exclusion areas from Bicknell to Hanksville and in some areas south of Hanksville along Highway 276.	Alternative N represents the current management situation. Exclusion areas include WSAs, where management is in accordance with the IMP. Management of WSAs as exclusion areas can only be changed by Congress. Avoidance areas include existing ACECs, eligible WSRs and areas closed to oil and gas (outside WSAs) or areas open to oil and gas with NSO. Although these decisions may affect current and future lines, a plan amendment (replace the word would with the word may) may be required to alter the decisions of the current MFPs if the action could not be mitigated to meet the purpose of avoidance area. The	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
			DRMP/DEIS would "consider exceptions on a case-by-case basis if the proposed right-of-way would: (1) Not create substantial surface disturbances or cause only temporary impacts; (2) Be compatible with the resource values being protected by the restrictions; (3) Be consistent with IMP objectives (WSAs only); (4) Be consistent with management prescriptions for ACECs and WSRs (Alternatives N, B, C and D); and (5) Pose no irreversible or irretrievable impacts to ACEC relevant and important values or WSR outstandingly remarkable values (Alternatives N, B, C and D) and (6) Not impact the wilderness characteristics of the identified non-WSA lands with wilderness characteristics (Alternative D only) (see DRMP/DEIS pages 2-79 - 2-80).	
Carl Albrecht	Garkane Energy Cooperative, Inc.	Map 2-30, Alternative A: Existing Lines: There are exclusion areas that appear to affect the present lines along Highway 24 between the Notom turn off road and Hanksville. Future Lines: There are some exclusion areas along Highway 276 south of Hanksville that may affect a future line to Ticaboo or Bullfrog.	The only exclusion areas within Alternative A are WSAs, where management is in accordance with the IMP. Management of WSAs as exclusion areas can only be changed by Congress. The DRMP/DEIS would "consider exceptions on a case-by-case basis if the proposed right-of-way would: (1) Not create substantial surface disturbances or cause only temporary impacts; (2) Be compatible with the resource values being protected by the restrictions; (3) Be consistent with IMP objectives (WSAs only); (4) Be consistent with management prescriptions for ACECs and WSRs (Alternatives N, B, C and D); and (5) Pose no irreversible or irretrievable impacts to ACEC relevant and important values or WSR outstandingly remarkable values (Alternatives N, B, C and D) and (6) Not impact the wilderness characteristics of the identified non-WSA lands with wilderness characteristics (Alternative D only) (see DRMP/DEIS pages 2-79 - 2-80).	Lands and Realty
Carl Albrecht	Garkane Energy Cooperative, Inc.	Map 2-31, Alternative B: Existing Lines: There are exclusion areas that appear to affect the present lines along Highway 24 between the Notom turn off road and Hanksville. Future Lines: There are some exclusion areas along Highway 276 south of Hanksville that may affect a future line to Ticaboo or Bullfrog.	Because of the map scale, it may appear that the existing lines would be affected. However, the existing ROWs do not occur within WSAs. Appendix 16 of the Proposed RMP discusses management prescriptions for non-WSA lands with wilderness characteristics carried forward in the PRMP/FEIS. Adjustments have been made for the utility corridors along Highway 24 and the Notom road and management prescriptions provide for the maintenance and use of existing facilities and valid existing rights. Exclusion/avoidance areas along Highway 276 do not occur on both sides of the highway at any one location. Placement of ROWs along this highway would be designed and/or include mitigation to meet the purpose of the avoidance area and would be addressed in site specific NEPA analysis. The DRMP/DEIS would "consider exceptions on a case-by-case basis if the proposed right-of-way would: (1) Not create substantial surface disturbances or cause only temporary impacts; (2) Be compatible with the resource values being protected by the restrictions; (3) Be consistent with IMP objectives (WSAs only); (4) Be consistent with management prescriptions for ACECs and WSRs (Alternatives N, B, C and D); and (5) Pose no irreversible or irretrievable impacts to ACEC relevant and important values or WSR outstandingly remarkable values (Alternatives N, B, C and D) and (6) Not impact the wilderness characteristics of the identified non-WSA lands with wilderness characteristics (Alternative D only) (see DRMP/DEIS pages 2-79 - 2-80)	Lands and Realty
Carl Albrecht	Garkane	Map 2-32, Alternative C: Existing Lines: The Kingston Canyon Line,	Within the range of alternatives, Alternative C, depicted on Map 2-32 would	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Energy Cooperative, Inc.	Grass Valley Feeder west of the Parker Substation, the transmission line from the Parker Substation to the Dry Valley area, the Pine Creek Road to west of Torrey, Rimrock area, Grover area, Notom Line, Notom turn off road to Hanksville, and the Hanksville Airport Line all have avoidance areas. Future Lines: A line to Ticaboo or Bullfrog could not be constructed without crossing avoidance areas and exclusion areas between the Bicknell Substation and Hanksville and south of Hanksville on Highway 276.	include more avoidance areas which may result in greater impacts to future ROWs. Placement of ROWs along or within avoidance areas would be designed and/or include mitigation to meet the purpose of the avoidance area and would be addressed in site specific NEPA analysis. The impacts of this alternative are discussed in Chapter 4 of the PRMP/FEIS. The DRMP/DEIS would "consider exceptions on a case-by-case basis if the proposed right-of-way would: (1) Not create substantial surface disturbances or cause only temporary impacts; (2) Be compatible with the resource values being protected by the restrictions; (3) Be consistent with IMP objectives (WSAs only); (4) Be consistent with management prescriptions for ACECs and WSRs (Alternatives N, B, C and D); and (5) Pose no irreversible or irretrievable impacts to ACEC relevant and important values or WSR outstandingly remarkable values (Alternatives N, B, C and D) and (6) Not impact the wilderness characteristics of the identified non-WSA lands with wilderness characteristics (Alternative D only) (see DRMP/DEIS pages 2-79 - 2-80).	
Charles Bagley c12n35.h.bagley@earthlink.net		I have hiked in Trachyte Creek and its tributaries on several occasions in the springtime. It was always beautiful. Thus, I was amazed that you do not recommend it for Wild and Scenic designation in the Richfield RMP DEIS! Most of Trachyte is of the open canyon type; a flat stream bottom with cottonwoods, surrounded by rock walls standing back from the stream, characteristic of Navajo Sandstone valleys. In the spring the clear water flows in lazy curves across the canyon bottom. The huge red walls and cottonwoods give marvelous shade in the afternoon. There is no visible sign of human use. And it has many outstanding camping sites. To qualify for Wild and Scenic status, a river must be free-flowing and have “at least one outstandingly remarkable value.” (Note that for any one river, these values need not be unique in that region!) Trachyte Creek meets these standards. It is free-flowing (undammed), and has these “outstandingly remarkable values”: It is quite wild. It is very scenic. It has beautiful canyon walls. It has, at least in the spring, outstandingly beautiful, accessible and drinkable water. It is wonderful for camping (recreation). Trachyte looks as wild and scenic as many other rivers that have been considered for “Wild and Scenic” status in Utah. An example in RFO is the Dirty Devil, strongly recommended for W & S status in this RMP, alternatives B, C, and D. The Dirty Devil has the same broad bottom with vertical walls set back from the stream, cottonwood trees, side canyons and many camping options. Trachyte has these same features, but the camping and water are better, though it lacks that perverse geological feature of the Dirty Devil, severe quicksand! The Dirty Devil is “outstandingly remarkable” and deserves W & S status. So does Trachyte Creek! Your decision criteria and comments for excluding Trachyte from “eligible” W & S status (page A2-12) are wrong and irrelevant. And a few of your comments actually favor, rather than	Eligibilty findings are completed. Public comments on the Draft Wild and Scenic River Eligibilty Report were requested in March 2004. Upon finalization of that report (Appendix 2 in the Draft RMP/EIS), the decision to be made in the RMP NEPA process no longer includes eligibilty findings. Suitability decisions are made only on the segments found eligible in Appendix 2.	Wild and Scenic Rivers

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		oppose W & S status: The principal criterion error is your implicit but obvious assumption that any “rare and distinctive” or “outstandingly remarkable” features of a river must be unique in the region. Many river canyons in a region may look similar, yet all could be eligible for W & S status, as you have rightly decided for the many side canyons of the Dirty Devil. Thus, you are off the mark when you say that, “From the standpoint of geology, Navajo-walled canyons are neither rare nor distinctive in this region.” First, the walls certainly are distinctive and beautiful. Secondly, there is no requirement under W & S that a river must have “rare or distinctive” geological features, or even any geological features at all. Thirdly, you are implying that whatever the feature, it must be unique “in this region.” Not true! You say, Trachyte Creek is not free-flowing in the upper canyons and can be totally dewatered by diversion for private property.” So what? This, per se, does not disqualify it. Elsewhere you state that a stream need not be flowing year round to qualify for W & S, especially if this lack of flow is just in its upper canyon. See your discussion of Maidenwater Creek (page A2-9), described by you as “unanimously supported as outstanding” despite your statement that “the stream is considered intermittent.” Visit Trachyte in April or May, peak hiking season, and try to convince any hikers there that that the river is not “free-flowing!” The first third of your Discussion is devoted to comments that refute claims that there are cultural resources in Trachyte, such as historic wagon routes. Again, so what? You deny that these claims are true, but true or false, as river has no need of “cultural resources” to qualify as W & S. In fact, the lack of traces of these wagon routes contributes to the “Wild” nature of the canyon, a positive feature. Your statement that “BLM gets very few inquiries regarding Trachyte Creek,” implying few hiker visits, is actually another argument FOR its wild status...If there are fewer visitors to Trachyte than to other rivers, it means it is even more appropriate for protection as Wild. In summary, you have applied the wrong standards in denying Trachyte Creek Wild and Scenic eligibility status. And your comments on the thinking that led to this decision do not address nor refute the plain facts that Trachyte Creek IS wild, scenic, and outstandingly remarkable for its recreation values. Please reverse this decision.		
Charles Chappell		#2 - Roads (#1 & 3 see map) in the Apple Brush area, one that goes to a water well sight area was there long before it was a W.S.A. (wilderness study area). By the rules set forth in the S.W.A. criteria the areas should have been eliminated from S.W.A. This is just two roads of many that should have eliminated some W.S.A. There are a lot of old uranium and gold mines and roads that have been left off the maps in the Henry Mountain and adjacent areas.	The road to the well was identified in the 1979 WSA inventory and is an inventoried route. The Mount Ellen WSA meets the Wilderness Act criteria in section 2(c)(1). See also Utah BLM Statewide Wilderness Final EIS 1990, volume 4, page 1-34 for the Mount Ellen WSA analysis and determination.	Wilderness Study Areas

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Charles Hawley		There is a single track trail that runs on the west rim of the Rainbow Hills that should be marked as a trail. This would be separate from the open riding area. The trail runs on the rim above the open area. The area east of the trail would be closed to OHV use and the area west of the trail down to the base of the hill where the open area begins would be closed to OHV use.	This comment was reviewed. No routes were identified for designation within this area due to other resource conflicts.	Travel Management – OHV Route Identification
Charles Schelz		Page 4-10, 3rd Paragraph: This is simply a litany of what probable direct impacts will occur. There are no indirect impacts listed. There is no information on amounts of area impacted. There are no lists of probable areas impacted based on future plans. There is no context, no intensity, and no duration discussed of any of the impacts listed. This is in direct violation of NEPA.	The impacts identified in the Draft RMP/EIS page 4-10 include both direct and indirect impacts from potential implementation actions, although the distinction between the two is not specified. The direct impacts of vegetation treatments "could result in soil compaction, some loss of vegetation cover..." However, any short-term increases in erosion, changes in soil chemistry, or long-term decreases in erosion, which are described in the same paragraph as the above quote, would occur at a later time, and would therefore be, by definition, an indirect impact. The RMP includes general landscape level goals for vegetation communities. Specific treatment types and areas would be determined on a case-by-case basis to best meet the conditions and needs of vegetation at the time of treatment. At the landscape level of planning, identifying specific amount of soil loss or the specific duration of impact is not possible. Site specific impacts will be analyzed in NEPA documents prior to project implementation.	Adequacy of Analysis and Alternatives
Charles Schelz		This section has the heading of "Methods and Assumptions" and lists a number of assumptions but no methods. Where is the methodology for determining impacts in this DRMP/EIS? NEPA requires a description of context, duration, and intensity of various impacts that are a result of management actions, yet these are barely addressed throughout this document. This is a violation of the requirements of NEPA and must be included in this Richfield DRMP/EIS.	Section 4.2 of the Draft RMP/EIS contains the following headings: Approach to the Analysis, Impact Analysis Terminology, Assumptions for Analysis, and Availability of Data and Incomplete Information. The approach to the analysis is discussed in Section 4.2.1. The impact analysis in Chapter 4 of the Draft RMP/EIS addresses the context, intensity, and duration of impacts as described in section 4.1.2.	Adequacy of Analysis and Alternatives
Charles Schelz		Page 4-33, 6th Paragraph: Again, this is not even close to a consideration and analysis of direct, indirect, and cumulative impacts. This is a violation ofNEPA. There are no data presented, no analyses presented, no context, no extent, no duration, no nothing.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS chapter 3 (e.g., soil resources, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7.	Adequacy of Analysis and Alternatives
Charles Schelz		The BLM's cumulative impacts analyses also lack data and/or convincing rationales for conclusions that cumulative impacts were short-term and insignificant. In a number of sections of this DRMP/EIS the BLM uses other NEPA documents to show analyses. It is a violation of NEPA to tier an analysis to a Programmatic NEPA document that has no site-specific analyses.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the	Adequacy of Analysis and Alternatives

Commentor	Affiliation	Comment	Comment Summary Response	Category
			DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	
Charles Schelz		Page 4-486, 4th Paragraph: The BLM does not provide any data on air quality, its trends over time, and the causes of any reduced air quality. The BLM does not mention, or consider the cumulative impacts all past, present, and reasonably foreseeable future actions. For example, there are no analyses of all the past, present, and reasonably foreseeable future surface disturbing activities that have occurred or may occur in the Richfield planning area, and the impacts on air quality from these disturbances.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	Adequacy of Analysis and Alternatives
Charles Schelz		NEPA requires that the cumulative impacts of past activities, present activities, and reasonably foreseeable future activities on local and regional water quality must be analyzed in this DRMP/EIS. At this point, this analysis is lacking in this Richfield DRMP/EIS. The BLM has not and must perform an appropriate cumulative impact analysis of soils and water resources in this Richfield DRMP/EIS.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	Adequacy of Analysis and Alternatives
Charles Schelz		Page 4-490, 6th Paragraph: In this section the BLM has failed to consider adequately the cumulative impacts for fish and wildlife. The BLM gives no indication that it has carefully searched out, documented, and analyzed all past, present, and reasonably foreseeable future actions that may impact fish and wildlife.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	Adequacy of Analysis and Alternatives
Charles Schelz		Page 4-491, 2nd Paragraph: Here, there is absolutely no attempt at any	As discussed in the Draft RMP/EIS on page 4-486, section 4.7.4.1, the	Adequacy of

Commentor	Affiliation	Comment	Comment Summary Response	Category
		analysis of cumulative impacts of fire and fuels management activities. The BLM gives no indication that it has carefully searched out, documented, and analyzed all past, present, and reasonably foreseeable future actions that may impact resources as a result of fire and fuels management activities.	cumulative impacts section is constructed to show "the potential for cumulative impacts to resource and resources uses," in this case the cumulative impacts to fire and fuels management. Cumulative impacts from fire and fuels management, outside what is proposed in the various alternatives and therefore analyzed in Draft RMP/EIS sections 4.3 through 4.6, are identified under the given resources/uses where the BLM determined an impact could occur. The effects of past fire and fuels management are reflected in the current vegetation conditions and fire regimes and condition classes, as described in the Draft RMP/EIS Section 3.3.11.	Analysis and Alternatives
Charles Schelz		Page 4-491, 3rd - 5th Paragraph: Since there is no special protection planned for these areas in Alternatives N, A, B, and C, the cumulative impact analysis must be carefully considered for significant impacts to these vitally important ecological areas. This section provides no such analysis. There is no analysis of past, present, or future activities within and adjacent to Non-WSA Lands with Wildemess Characteristics.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, fires and fuel management, non-WSAs with wilderness characteristics, forestry and woodland products, lands and realty actions, special designations, recreation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7.	Adequacy of Analysis and Alternatives
Charles Schelz		Page 4-492, lst Paragraph: This section is wholly lacking in analysis of cumulative impacts. The BLM has failed to provide the proper information, as required by NEPA, in order to make any kind of decision based on cumulative impacts. The BLM gives no indication that it has carefully searched out, documented, and analyzed all past, present, and reasonably foreseeable future actions that may impact resources as a result of forestry and woodland product activities.	Impacts from reasonably forseeable forestry and woodland product activities on BLM lands in the Richfield Field Office are addressed in the Draft RMP/EIS section 4.3 through 4.6. Background information on the past use levels and current trend for the use of forestry and woodland products is contained in the Management Situation Analysis, section 3.5. This information is summarized and described in the Draft RMP/EIS section 3.4.1. Based on that information, the trend for use of forest and woodland products is very low, and the impacts from such use would also be low, as described in the Draft RMP/EIS Chapter 4.	Adequacy of Analysis and Alternatives
Charles Schelz		Page 4-492, 2nd-3rd Paragraphs: This section primarily discusses how other activities will impact livestock grazing and ignores the many cumulative adverse impacts that livestock grazing has on just about every function of the ecosystem. The BLM gives no indication that it has carefully searched out, documented, and analyzed all past, present, and reasonably foreseeable future actions that may impact resources as a result of livestock grazing activities.	As discussed in the Draft RMP/EIS on page 4-486, section 4.7.4.1, the cumulative impacts section is constructed to show "the potential for cumulative impacts to resource and resources uses," in this case the cumulative impacts to livestock grazing. Cumulative impacts from livestock grazing, outside what is proposed in the various alternatives and therefore analyzed in Draft RMP/EIS sections 4.3 through 4.6, are identified under the given resources/uses where the BLM determined an impact could occur.	Adequacy of Analysis and Alternatives
Charles Schelz		Page 4-492, 4th Paragraphs: This cumulative impacts section is inadequate and a violation of NEPA. The BLM gives no indication that it has carefully searched out, documented, and analyzed all past, present, and reasonably foreseeable future actions that may impact resources as a result of recreation activities.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the	Adequacy of Analysis and Alternatives

Commentor	Affiliation	Comment	Comment Summary Response	Category
			DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	
Charles Schelz		Page 4-493, 2nd Paragraphs: This cumulative impacts section is inadequate and a violation of NEPA. The BLM gives no indication that it has carefully searched out, documented, and analyzed all past,-present, and reasonably foreseeable future aetions that may impact resources as a result of travel management activities.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	Adequacy of Analysis and Alternatives
Charles Schelz		Page 4-493, 5th Paragraphs: This cumulative impacts section is inadequate and a violation of NEPA. The BLM gives no indication that it has carefully searched out, documented, and analyzed all past, present, and reasonably foreseeable future actions that may impact resources as a result of lands and realty activities.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	Adequacy of Analysis and Alternatives
Charles Schelz		Page 4-494, 1st Paragraphs: This cumulative impacts section is inadequate and a violation of NEPA. The BLM gives no indication that it has carefully searched out, documented, and analyzed all past, present, and reasonably foreseeable future actions that may impact resources as a result of minerals and energy activities.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	Adequacy of Analysis and Alternatives
Charles Schelz		Page 4-494-495: This cumulative impacts section is inadequate and a	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future	Adequacy of

Commentor	Affiliation	Comment	Comment Summary Response	Category
		violation of NEPA. The BLM gives no indication that it has carefully searched out, documented, and analyzed all past, present, and reasonably foreseeable future actions that may impact special designated areas asa result of proposed management activities.	actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	Analysis and Alternatives
Charles Schelz		Page 4-486, 5th Paragraph: In this paragraph the BLM states: "Direct and indirect short-term and long-term cumulative impacts from any proposed activities on air quality are projected to be minimal to negligible under all alternatives." This is a conclusion with assertions that are not backed up with data and/or the rationale for them.	Please see the revised air quality impact analysis section of chapter 4 of the PRMP/FEIS.	Air Quality
Charles Schelz		The width and extent of "Right-of Ways" and "Easements" proposed in the alternatives are too large and expansive to maintain functional ecosystems, viable unfragmented wildlife populations, intact natural vegetation communities, intact soil structure, and prevent widespread wind (dust) and soil erosion. In order to protect the ecological integrity of the Richfield Planning area, it is recommended that all "rights-of-ways" and "easements" are limited to a maximum width of 100 meters or less, and that the total number be minimized.	The Draft RMP-EIS identifies rights-of-way avoidance and exclusion areas based on resource and resource use concerns. The width of rights-of-ways is an implementation level decision that would be addressed on a case-by-case basis using site-specific NEPA analysis.	Lands and Realty
Charles Schelz		Page 4-8, 5th Paragraph: Here it is stated that the greatest impacts to soil are from cross-country vehicle travel. ..... etc. Livestock grazing is not even mentioned, yet its past and present activities continue to have short- and long-term direct, indirect, and cumulative adverse impacts.	The section the commentor is critiquing is impacts to Air Quality from Travel Management action. Impacts to air quality from livestock grazing was determined to have little or no impact. Impacts to soils from livestock grazing are found in the Draft RMP/EIS on page 4-12.	Livestock Grazing
Charles Schelz		In this DRMP/EIS, the BLM must cease relying on simply referring to standards and guidelines as the analysis of direct, indirect, and cumulative impacts. The Fundamentals of Rangeland Health and Standards and Guidelines for Rangeland Management have been in place for over 10 years, and the BLM has very little, if any, actual data or reports to show improvements or trends. If there are any data or reports, this information must be summarized in this DRMP/EIS.	The BLM Standards and Guidelines direct BLM to manage for rangeland health. The Standards and Guidelines are the best management practices (BMPs) for livestock grazing management. These BMPs are designed to attain or move towards attaining rangeland health standards. Allotment summaries for Rangeland Health are maintained in individual allotment files as well as monitoring studies. The Final EIS would be too voluminous to include summaries of each allotment.	Livestock Grazing
Charles Schelz		The Richfield DRMP/EIS fails to adequately address the negative direct, indirect, and cumulative effects of livestock grazing on the soils, vegetation, water quality, and stream functions within riparian areas.	Livestock grazing has been permitted under the Taylor Grazing Act in the Richfield Field Office for several decades. Monitoring and subsequent adjustments to grazing practices over the past 25 years, since completion of the comprehensive grazing EISs, have resulted in marked improvement through the Richfield Field Office's rangelands. As required by NEPA, the current planning effort is an issue driven effort. Through the public scoping period, livestock grazing was not raised as a significant issue. NEPA regulations direct that scoping should determine the significant issues to be analyzed in depth in the	Livestock Grazing

Commentor	Affiliation	Comment	Comment Summary Response	Category
			EIS, as well as identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1501.7(a)). Therefore, the level of detail presented in the Draft RMP/EIS for livestock grazing was adjusted to its present level.	
Charles Schelz		Since in this DRMP/EIS there is no planned special protection for Non-WSA Lands with Wildemess Characteristics in Alternatives N, A, B, and C, the cumulative impact analysis must be carefully considered for significant impacts to these last remaining vitally important ecological areas. This DRMP/EIS provides no such analysis. There is no analysis of past, present, or future activities within and adjacent to Non-WSA Lands with Wildemess Characteristics.	A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	Non-WSA Lands with Wilderness Characteristics
Charles Schelz		This Richfield DRMP/EIS does not adequately address direct, indirect, and cumulative impacts. The cumulative impacts section of this DRMP/EIS is especially troublesome, as it fails to provide adequate analyses of other past, present, and reasonably foreseeable future actions within the analysis area. The BLM's cumulative impacts analyses also lacks data and/or a convincing rationale for their conclusions that cumulative impacts were insignificant.	A systematic interdisciplinary approach was used to provide accurate, objective and scientifically sound environmental analysis on the environmental consequences associated with the management actions or prescriptions under each alternative. The analysis discloses the direct, indirect, and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives. Further, a site specific analysis is not possible at the land use planning level. Detailed impact analysis will be conducted for site-specific authorizations during implementation of the decisions in the RMP.	Process and Procedures
Charles Schelz		The purpose of the National Environmental Policy Act (NEPA) is to provide line officers and the public with full disclosure of the environmental consequences of taking action so they can make "informed" decisions. The Council on Environmental Quality regulations require that impact analyses include discussions of adverse and beneficial effects, short- and long-term effects, direct and indirect effects, and cumulative effects. The characterization of impacts must not only be simply an accounting of acres affected, as is the case throughout this Richfield DRMP/EIS, but it must include descriptions of potential beneficial and adverse impacts, of impact duration, intensity or magnitude, and context (site specific, local, regional, and national effects, etc.), and there must be an analysis of direct, indirect, and cumulative impacts. In this Richfield DRMP/EIS, many of the conclusions regarding potential impacts are presented without supporting scientific analysis, agency monitoring data or rationale, and, as such, appear arbitrary and unfounded.	A systematic interdisciplinary approach was used to provide accurate, objective, and scientifically sound environmental analysis on the environmental consequences associated with the management actions or prescriptions under each alternative. The analysis discloses the direct, indirect, and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives. Furthermore, the DRMP/DEIS page 4 explains: "Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA) require that agencies evaluating reasonably foreseeable significant adverse effects on the human environment in an EIS identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 Code of Federal Regulations [CFR] 1502.22). As is typical in programmatic planning efforts, site-specific data are used to the extent possible but may not be entirely available. The best available information that is pertinent to management actions was used in developing this Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS)."	Process and Procedures
Charles Schelz		This is not an adequate analysis. Many areas within the Richfield planning area are adversely impacted, and have been for many years by activities allowed by the BLM. These impacts must be analyzed in greater detail, and BLM must provide supporting analysis and the rationale for the agency's subsequent conclusions.	As is typical in programmatic planning efforts, site-specific data are used to the extent possible but may not be entirely available. Where information was unavailable or incomplete, estimates were made regarding the number, type, and significance. Additionally, some impacts cannot be quantified given the proposed management actions. Where this gap occurs, impacts are projected in qualitative terms. In many situations, subsequent project-level analysis will provide the opportunity to collect and examine site-specific inventory data required to	Process and Procedures

Commentor	Affiliation	Comment	Comment Summary Response	Category
			determine appropriate application of RMP-level guidance. In addition, ongoing inventory efforts by BLM and other agencies within the planning area continue to update and refine information that will be used to implement this RMP.	
Charles Schelz		BLM's Richfield DRMP/EIS fails to include a reasonable range of Alternatives. It contains no alternative that would adequately protect the scarce riparian resources of the Richfield BLM Planning area from OHV use, livestock grazing, mineral development and associated damages from these activities.	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Richfield Draft RMP/EIS shows a comparison of the management actions associated with each alternative. The Draft RMP/EIS is consistent with the Utah Riparian Policy. The policy includes guidelines for mitigation of impacts to riparian areas from mineral activities.	Process and Procedures
Charles Schelz		The DRMP must include a wider range of alternatives for designated OHV routes, and specifically the DRMP must include an alternative that would minimize the impacts noted above.	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Richfield Draft RMP/EIS shows a comparison of the management actions associated with each alternative.	Process and Procedures
Charles Schelz		The range of Alternatives for allowing Livestock Grazing is also inadequate. This DRMP/EIS fails to take into account the serious past, present, and future long-term direct, indirect, and cumulative adverse impacts of livestock grazing on areas that contain, or contained, biological soil crusts. This could be as much as 90% of the Richfield planning area. The BLM must follow the mandate of NEPA and develop a reasonable range of alternatives regarding livestock grazing.	An alternative considering a "no grazing" alternative was considered for inclusion in the DRMP/DEIS. However, it was eliminated from further analysis for failure to meet the purpose and need of the DRMP/DEIS (see DRMP/DEIS page 2-9) . Further, it is BLM policy to monitor existing livestock use levels, forage utilization, and the trend of resource condition and make necessary adjustments on an allotment or watershed basis. These actions are activity-based actions and are part of the implementation of an RMP to assure that Rangeland Health Standards are met, as well the other objectives of the RMP. Regulations at 43 CFR 4130.3 require that the terms and conditions under which livestock are authorized “ensure conformance with the provisions of subpart 4180,” the Standards for Rangeland Health and further 43 CFR 4130.3-1 require that “livestock grazing use shall not exceed the livestock carrying capacity of the allotment”. It would be inappropriate and unfeasible to estimate variable levels of livestock and wildlife use and determine what specific changes to livestock and wildlife numbers and management are appropriate at the RMP planning level. Such changes would not be supportable and need to be made by considering the monitoring data on a site-specific basis. The BLM policy directs that monitoring and inventory data be evaluated on a periodic basis and that change to livestock numbers and	Process and Procedures

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			management be made through a proposed decision under 43 CFR 4160. These implementation level decisions will be in conformance with the Goals and Objectives of the applicable RMP, and must protect and enhance the conditions and uses of the BLM lands.	
Charles Schelz		What are the direct, indirect, and cumulative impacts of these OHV routes within specific riparian areas? The Richfield DRMP/EIS merely mentions some general direct impacts but fails to disclose the long-term indirect and cumulative impacts.	The BLM used the Standards for Public Land Health and Guidelines for Recreation Management for BLM lands in Utah in considering the impacts of OHV use and dispersed camping on riparian areas. The Rangeland Health Standard 2 directs the BLM to "where feasible, developed travel routes should be located away from sensitive riparian areas" and "camping in riparian areas should be avoided … to reduce vegetation disturbance and sedimentation." Further, the BLM has inventoried riparian areas throughout the RFO. About 455 miles of lotic riparian habitat and 1,423 acres of lentic riparian habitat have been inventoried on public lands in the RFO. The BLM had completed a condition assessment of all inventoried riparian areas in allotments during the 1990s. More recently, under the Utah Standards and Guidelines for Rangeland Health, the BLM expanded the definition for riparian areas to include seeps and springs. To date, approximately 59 percent of riparian areas, under the more comprehensive definition, have been inventoried. The vast majority of riparian lands inventoried have been found to be in "proper functioning condition".	Process and Procedures
Charles Schelz		The DRMP/EIS fails to provide enough information to adequately assess the direct, indirect, and cumulative impacts of OHV use in the riparian areas within the Richfield planning area. The DRMP/EIS does not clearly state how many, and the total mileage ofOHV routes that will be allowed within riparian areas. Thus, it is extremely difficult to differentiate the effects of each Alternative. In addition, the DRMP/EIS fails to identify what specific riparian areas will be affected, how much of the total percentage of riparian areas and floodplains will contain OHV routes in the different alternatives, or what specific riparian areas will be "Closed."	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7.	Process and Procedures
Charles Schelz		This Richfield DRMP does not present an adequate range of Alternatives for the proposed number and extent of open designated OHV routes in the Travel Plan.	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. The majority of the lands are open to OHV use under the No Action Alternative and primarily closed to OHV use under Alternative D. The other alternatives provide intermediate levels of management prescriptions.	Process and Procedures
Charles Schelz		By failing to provide an adequate range of alternatives for the number and extent of OHV routes allowed, and failing to disclose the impacts researched and discussed in objective scientific papers, the BLM is ignoring serious and predictable impacts, and appears to discount these	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative	Process and Procedures

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		adverse impacts as insignificant without providing data or analyses to back up this position.	considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. The majority of the lands are open to OHV use under the No Action Alternative and primarily closed to OHV use under Alternative D. The other alternatives provide intermediate levels of management prescriptions.	
Charles Schelz		What are the purposes and reasons for each of the designated OHV routes? The DRMP/EIS fails to adequately address the purpose of these routes.	The Proposed RMP/Final EIS has been revised to include an appendix on the criteria used to identify OHV routes.	Process and Procedures
Charles Schelz		It is recommended that the BLM analyze the direct, indirect, and cumulative effects of roads, throughout the 2, I00,000 acres of the Richfield Planning area that will contribute to the fragmentation and other negative effects on wildlife habitat.	The effects on habitat fragmentation associated with each of the alternatives is presented in the special status species and fish and wildlife impacts analysis in section 4.3.8 and 4.3.9 of the Draft RMP/EIS. As projects are proposed, site-specific NEPA, include effects on habitat fragmentation will be conducted.	Process and Procedures
Charles Schelz		It is recommended that the BLM act wisely and in the spirit of its mandates and commitments to maintain healthy and sustainable ecosystems, by eliminating and restoring many of these OHV routes. If many of these routes remain open to motorized use for the next 1O~20years,much wildlife habitat will continue to be at risk due to many of the adverse impacts listed above. This has not been adequately addressed in this Richfield DRMP/EIS.	In formulation of the Travel Plan, the BLM specifically considered resource conflicts along with purpose and need for individual routes in the action alternatives. Furthermore, BLM reduces acreages in the areas “open” to cross country vehicle travel to less than one percent. As stated in Table 2-17 of the Draft RMP/EIS: "If OHV use in areas designated as open or limited causes threats or adverse impacts to resources, the BLM would take appropriate steps, including but not limited to use restrictions or closures, installation of additional signs and barricades, restoration of affected areas, etc." In additon the Draft RMP/EIS includes management action to address this issue on page 2-72 which states: "Rehabilitation of closed OHV routes would occur on a case-by-case basis as required to mitigate impacts to resources. Closed or non-designated routes would be allowed to rehabilitate naturally unless a specific resource impact was occurring that warranted expedited rehabilitation of the route (e.g., soil erosion, water quality concerns, and/or continued illegal use)."	Process and Procedures
Charles Schelz		This DRMP/EIS fails to analyze the serious short- and long-term adverse cumulative impacts from livestock grazing in desert environments that have been documented in so manypublished papers (see above list).	The majority of the RFO is comprised of semi-arid and montane climate and is not a true desert environment (less than 10 inches of annual precipitation) (http://pubs.usgs.gov/gip/deserts/what/). The DRMP/DEIS analyzed short-term and long-term impacts from livestock grazing in the decision area.	Process and Procedures
Charles Schelz		The DRMP's range of alternatives for livestock grazing is not adequate and must be expanded to include alternatives that prohibit grazing (0%), allow a small amount of grazing (15-25%), or more grazing(50%), or a lot ofgrazing (>90%).	An alternative considering a "no grazing" alternative was considered for inclusion in the DRMP/DEIS. However, it was eliminated from further analysis for failure to meet the purpose and need of the DRMP/DEIS (see DRMP/DEIS page 2-9) . Further, it is BLM policy to monitor existing livestock use levels, forage utilization, and the trend of resource condition and make necessary adjustments on an allotment or watershed basis. These actions are activity-based actions and are part of the implementation of an RMP to assure that Rangeland Health Standards are met, as well the other objectives of the RMP. Regulations at 43 CFR 4130.3 require that the terms and conditions under which livestock are authorized “ensure conformance with the provisions of subpart 4180,” the Standards for Rangeland Health and further 43 CFR 4130.3-1 require that “livestock grazing use shall not exceed the livestock carrying capacity of the allotment”. It would be inappropriate and unfeasible to estimate variable levels of livestock and wildlife	Process and Procedures

Commentor	Affiliation	Comment	Comment Summary Response	Category
			use and determine what specific changes to livestock and wildlife numbers and management are appropriate at the RMP planning level. Such changes would not be supportable and need to be made by considering the monitoring data on a site-specific basis. The BLM policy directs that monitoring and inventory data be evaluated on a periodic basis and that change to livestock numbers and management be made through a proposed decision under 43 CFR 4160. These implementation level decisions will be in conformance with the Goals and Objectives of the applicable RMP, and must protect and enhance the conditions and uses of the BLM lands.	
Charles Schelz		All of these activities will adversely affect migratory birds, yet there is no mention of the impacts of these activities on migratory birds. The BLM must fully analyze the direct,indirect, and cumulative impacts of these activities on migratory bird populations and habitat.	The DRMP/DEIS considers migratory birds throughout the document. Under Fish and Wildlife Common to All Alternatives the documents states: "Implement the conservation actions identified in Executive Order 13186, Federal Agency Responsibilities Under the Migratory Bird Treaty Act, with particular emphasis on those migratory birds identified as Priority Species in the Utah Conservation Strategy" (page 2-26). Chapter 3 of the DRMP/DEIS described migratory birds in the affected environment (see pages 3-29, 3-47, 3-50 and 3-51). Chapter 4 of the DRMP/DEIS analyzed the environmental consequences of potential management actions on migratory birds (see pages 4-147, 4-153, 4-155, 4-156, 4-157, 4-160, 4-161, 4-162, 4-163, 4-170, 4-174, 4-176, 4-179, 4-180, 4-181, and 4-183). Additionally, migratory birds were considered in Appendices 3, 8 and 10 (see pages A3-2, A3-7, A8-81, A9-1 and A10-1). Furthermore, the PRMP/FEIS was updated to consider the USFWS Birds of Conservation Concern and the Utah Partners in Flight Priority Species to identify and conserve priority nesting habitats for migratory birds for all alternatives.	Process and Procedures
Charles Schelz		Many of the impacts described in this Richfield DRMP/EIS have been monitored by the BLM, but the DRMP fails to include this monitoring data, or to provide analyses, trends, and summary data for the information collected in the field.	There is no legal or regulatory requirement to provide monitoring data in the land use plan. This request is outside the scope of the document. The information is available in the RFO files.	Process and Procedures
Charles Schelz		Where monitoring programs have been developed and used, the BLM must write summary and trend reports ay least every 5 years so that managers and the public can make determinations on the effectiveness of the management of allowed activities.	There is no legal or regulatory requirement to provide monitoring data in the land use plan. This request is outside the scope of the document. The information is available in the RFO files.	Process and Procedures
Charles Schelz		The BLM must be very clear and concise about its definition of "sustainable" in order for management and the public to be able to ascertain effective management strategies and impacts for the next 10-20 years.	The EPA definition for sustainability has been added to the glossary in the PRMP/FEIS.	Process and Procedures
Charles Schelz		It appears that in developing the Richfield DRMP for the Richfield planning area, the BLM is supporting livestock grazing, OHV recreation, and mimeral development activlities so blIndly, that it is neither managing these lands for multiple use, nor is it protecting the land's long-term health, because it refuses to consider the well-documented and real and devastating direct, indirect, and cumulative impacts of livestock grazing, OHV use, and mineral development on the soil,	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully	Process and Procedures

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		vegetation, wildlife, and water resources. Also the BLM fails to consider adequately other uses that are not major extractive industries.	compare the consequences of each management prescription or action. Table 2.1 in the Richfield Draft RMP/EIS shows a comparison of the management actions associated with each alternative.	
Charles Schelz		In this Richfield DRMP/EIS, by not including a reasonable range of altematives, and not adequately assessing and disclosing with the impacts of livestock grazing, OHV routes, vegetation treatments and mineral development, the BLM is skirting the NEPA requirements that compel the agencies to concentrate on the significant issues that will seriously effect the protection, restoration, and enhancement of the human environment. Only by considering a full range of alternatives and the full direct, indirect, and cumulative impacts of these activities can the BLM make sound management decisions.	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Richfield Draft RMP/EIS shows a comparison of the management actions associated with each alternative.	Process and Procedures
Charles Schelz		For cumulative impacts the following questions must be answered according to the Judicial Review Standard: The "Fritiofson v. Alexander?" Test (Fritiofson v. Alexander, 772 F.2d 1225 (5th Cir. 1985).	The RFO is in the 10th Circuit Court jurisdiction. The case cited is not authority in the 10th Circuit, nor is it considered reliable authority for the principle for which the commentor cites. BLM acknowledges that as part of its cumulative impacts analysis, impacts beyond the planning area must be included. BLM defines the cumulative impact anlaysis area in the Cumulative Impact Analysis section in Chapter 4. The past, present and reasonably foreseeable actions are also discussed in the Cumulative Impact Analysis section in Chapter 4.	Process and Procedures
Charles Schelz		The riparian "330 foot" buffer proposed within this Richfield DRMP/EIS is woefully inadequate to prevent widespread riparian long-term, direct, indirect and cumulative impacts.	Not allowing surface disturbing activities within 330 feet of riparian/wetland areas is the Utah BLM policy outlined in IM-UT-2005-091. The Draft RMP/EIS also evaluated not allowing surface disturbing activities within 660 feet of riparian/wetland areas and analyzed the impacts from this decision.	Riparian
Charles Schelz		For these reasons, and many more, the BLM must establish an effective buffer zone to protect the less than 1% of the Richfield planning area that riparian habitat encompasses. When there is nearby surface disturbance, the proposed BLM buffer of "330 feet" is inadequate in this dry desert environment, because of the ease of which soil disturbance and erosion, vegetation loss, and soil and water contamination can spread into the floodplain and riparian habitats.	Not allowing surface disturbing activities within 330 feet of riparian/wetland areas is the Utah BLM policy outlined in IM-UT-2005-091. The Draft RMP/EIS also evaluated not allowing surface disturbing activities within 660 feet of riparian/wetland areas and analyzed the impacts from this decision.	Riparian
Charles Schelz		It is recommended that the DRMP fully disclose what particular riparian areas will have OHV routes in/near them. Specifically, each riparian area should be listed as either open or closed to OHV use, with "open" being those riparian areas that have an OHV route within the riparian area and/or floodplain. The DRMP/EIS should also disclose each of the routes clearly with descriptions and maps, and address how they will be maintained. The DRMP/EIS should also address future relocation and closure due to deteriorating riparian conditions and deteriorating route conditions due to continuous wear and tear and storm events.	The impact analysis used the best available information and methodology to determine the impacts to riparian areas associated with the Draft RMP/EIS. The Draft RMP/EIS has been modified to include Appendix 9 that describes the process used for route identification. The presence of riparian areas was considered during route identification, and will continue to be a criterion in identifying routes. In addition, monitoring riparian conditions, as needed, for surface uses that could affect riparian area health and functionality would ensure appropriate actions could be taken to protect these areas before functioning condition becomes impaired.	Riparian
Charles Schelz		Page 3-15, 16; This section emphasizes the extreme ecological importance of riparian areas, but there is not enough information to be able to determine the trends, or to make an educated guess about the	The impact analysis used the best available information and methodology to determine the condition of and impacts to riparian areas associated with the Draft RMP/EIS. Section 3.3.4.4 of the Draft RMP/EIS has been modified to include	Riparian

Commentor	Affiliation	Comment	Comment Summary Response	Category
		base condition of these areas. Riparian habitat makes up less than I% of the planning area, yet the BLM has not finished even estimating the condition of most of this important habitat. There are numbers in Table 3-9 but there is no information about what percentage of all riparian area has been surveyed or what is causing the impacts.	results of the most recent condition surveys. The BLM has completed a condition assessment of all inventoried riparian areas in allotments. All riparian areas in allotments were inventoried in the early 1990s. More recently, under the Utah Standards and Guidelines for Rangeland Health, the definition for riparian areas was expanded to include seeps and springs. To date, approximately 59 percent of riparian areas, under the more comprehensive definition, have been inventoried.	
Charles Schelz		Thus, the BLM must manage the small percentage of riparian habitat that is in the Richfield DRMP project area, less than 1% of the total area, for the maximum benefit of renewable resources, and for the ecological benefit of surrounding areas.	Page 2-16 of the Draft RMP/EIS includes management alternatives for riparian areas.	Riparian
Charles Schelz		Even if a 1500 meter buffer zone is established, the direct, indirect, and cumulative impacts of mineral resource projects and oil and gas exploration and development in and near riparian areas, seeps, and springs must be analyzed thoroughly by the BLM, and such analysis is even more critical if BLM fails to establish this reasonable buffer zone area. Potential impacts of mineral development and exploration on riparian areas, water quality and quantity are not addressed adequately in this Richfield DRMP/EIS; this is especially relevant considering the increase in mining and oil and gas exploration applications and future plans of the industry.	Not allowing surface disturbing activities within 330 feet of riparian/wetland areas is the Utah BLM policy outlined in IM-UT-2005-091. The Draft RMP/EIS also evaluated not allowing surface disturbing activities within 660 feet of riparian/wetland areas and analyzed the impacts from this decision.	Riparian
Charles Schelz		BLM must perform these types of analyses before committing to 10-20 more years of management without adequate background baseline, trend, and potential habitat extent information.	As stated in section 4.2.4 of the Draft RMP/EIS: "The best available information that is pertinent to management actions was used in developing this Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS). Considerable effort has been taken to acquire and convert resource data into digital format for use in this DRMP/DEIS—data was acquired from both BLM and from outside sources, such as the Utah Division of Wildlife Resources (UDWR). However, certain information was unavailable for use in developing this DRMP/DEIS. For these resources (and others where information was unavailable or incomplete), estimates were made regarding the number, type, and significance based on previous surveys and existing knowledge. Additionally, some impacts cannot be quantified given the proposed management actions. Where this gap occurs, impacts are projected in qualitative terms. In many situations, subsequent project-level analysis will provide the opportunity to collect and examine site-specific inventory data required to determine appropriate application of RMP-level guidance. In addition, ongoing inventory efforts by BLM and other agencies within the planning area continue to update and refine information that will be used to implement this RMP."	Scope of Document
Charles Schelz		The destruction of biological soil crusts is a "long-term" impact. The loss of biological soil crusts has long-term indirect and cumulative effects on soil stability and moisture, on the amount of vegetation, vegetation, type, vegetation health and vigor, and is directly responsible for the loss of many important ecological functions within the ecosystem.	This type of analysis is an implementation level action that will be addressed by site-specific NEPA analsis. As specific actions are taken, impacts to biological soil crusts will be considered in the analysis.	Soil Resources

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Charles Schelz		The BLM Richfield Field Office must classify biological soil crusts as a "sensitive and fragile soil type".. BSC's are classifiedas such in the BLM Moab Field Office. Why not in the Richfield Field Office?	Fragile or sensitive soils for the purposes of this RMP and subsequent project analyses are defined as soils that have a high wind or water erosion hazard, or are difficult to reclaim or restore due to physical and chemical properties (e.g., high salt or gypsum concentrations, high rock content, or low available water; or soils that are more susceptible to impacts and damage due to high water tables (hydric or wetland/riparian soils) or very fine surface textures. Information used to identify sensitive soils includes soil surveys, ecological site descriptions, local monitoring records and research studies. The mere existence of a biological soil crust exists does not constitute a "sensitive and fragile" designation. When activities are proposed on these types of soils additional mitigation measures, beyond standard operating procedures and typically used best management practices, will be considered in order to protect resources associated with these sites.	Soil Resources
Charles Schelz		Page 3-5, 1st Paragraph: It appears from the age of the soil surveys that the soil data the BLM is working with is extremely outdated. Some areas in Piute County and western Wayne County have never been surveyed. More recent data must exist for these areas and must be used in planning the next 20 years, The BLM must summarize this soil data and present it in this document, especially mformahon about conditions and trends.	BLM used the best available data for the soil studies. When 3rd order surveys are completed for Piute and western Wayne and Sevier Counties, BLM will utilize the data contained in the surveys.	Soil Resources
Charles Schelz		There is no information about the condition of the soils in this section of this Richfield DRMP/EIS. The fact that the BLM has been collecting rangeland health assessment information for the past 50 years, or 30, or 20, or 10 years, and has not presented any summary information about this is not adequate and completely disregards one of the primary reasons for an assessment/monitoring program.	BLM used the best available data for the soil studies. When 3rd order surveys are completed for Piute and western Wayne and Sevier Counties, BLM will utilize the data contained in the surveys.	Soil Resources
Charles Schelz		Page 4-10, 4th Paragraph: It is doubtful, as stated in this paragraph, that the "majority of impacts to soils from vegetation management will come from fire and fuels management". It all depends on the extent and type of "vegetation management" that is planned for the next 10-20 years. The types of "vegetation treatments" planned have not been adequately disclosed in this DRMP/EIS in order for one to determine the potential scale of impacts. What kinds of treatments are planned?	"The majority of impacts" has been removed from this sentence. Because vegetation conditions can change so quickly due to climatic conditions, fire, insect infestations, herbivory, etc., there is no 10-20 year vegetation plan. Specific vegetation plans are not included in the RMP. The analysis in the RMP EIS is for the broad scale planning of the resource area; specific treatments are outside the scope of the RMP.	Soil Resources
Charles Schelz		Page 4-19, 1st Paragraph: This is just a listing of various direct impacts. There is no analysis based on quantitative or qualitative data, nor is there a serious consideration of indirect impacts. Compaction of soil equals destruction of biological soil crusts and is a long-term adverse impact, not "short-term" as stated in this paragraph.	This type of analysis is an implementation level action that will be addressed by site-specific NEPA analsis. As specific actions are taken, impacts to biological soil crusts will be considered in the analysis.	Soil Resources
Charles Schelz		This DRMP/EIS does not properly address direct, indirect and cumulative impacts of OHV use and roads. This is in direct violation ofNEPA. There is only a listing of probable direct impacts without any qualitative or quantitative analysis of direct, indirect, and cumulative impacts on the soils, biological soil crusts, and the vegetation, especially	This type of analysis is an implementation level action that will be addressed by site-specific NEPA analsis. As specific actions are taken, impacts will be considered in the analysis.	Soil Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		the indirect and cumulative impacts in adjacent areas from water and wind erosion. Simply referring to the Fundamentals of Rangeland Health and the Standards and Guidelines for Grazing Administration is not an impact analysis, which is required by NEPA in this DRMP/EIS.		
Charles Schelz		Impacts from Minerals and Energy Page 4-19, 5t h Paragraph: This DRMP/EIS does not properly address direct, indirect, and cumulative impacts of mineral and energy activities, which is in direct violation of NEPA. There is only a listing of probable direct impacts, without any qualitative or quantitative information or analysis of direct, indirect, and cumulative impacts on the soils, especially the indirect and cumulative impacts from water and wind erosion on the soils in areas adjacent and downstream to disturbed sites. Simply referring to the use of Best Management Practices (BMP's) is not an impact analysis.	This type of analysis is an implementation level action that will be addressed by site-specific NEPA analsis. As specific actions are taken, impacts will be considered in the analysis.	Soil Resources
Charles Schelz		Yet, nowhere in this document can there be found any provisions for protecting, enhancing, or restoring crucial floodplain habitat. The following fish species need backwaters in healthy floodplains in order to reproduce successfully and become self sustaining: Roundtail chub, Flannel mouth sucker, Colorado pike minnow, and the Humpback chub. These highly productive low-velocity habitats are thought to be an essential component of the life history of these species.	BLM concurs with the need to protect, enhance, and restore crucial floodplain habitat. Table 2-4 (Water Resources), page 2-12, makes clear that the desired goals and objectives of water resource management is to avoid adverse impacts to floodplains and to restore and preserve the natural and beneficial values served by floodplains. Table 2-5 (Vegetation Decisions), page 2-16 of the Draft RMP-EIS presents a range of alternatives that would provide protection for the floodplains and associated riparian areas. The preferred alternative in the Final RMP-EIS states that a buffer zone would be implemented on 330 feet on either side of a stream or within the 100-year floodplain.	Special Status Species
Charles Schelz		The BLM should state clearly and unequivocally that "limited" means OHV use will be allowed in riparian areas, merely be limited to designated routes within riparian areas, that OHV use will not be precluded from riparian areas, and that such OHV use will adversely affect the riparian areas.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. Enforcement and fines are beyond the scope of this document.	Travel Management – OHV Area Categories
Charles Schelz		This appears to be an arbitrary and excessive figure for which no basis is provided in the DRMP. Is the Planning area in such bad shape that practically the whole area needs to be intensively manipulated by the blunt instrument of "vegetation treatments" over the course of the next 20 years?	"Vegetative treatments were addressed in the Vegetation Treatments on Bureau of Land Management Lands in 17 Western States PER in 2007. General impacts from these treatments were adequately described and analyzed in that document. Watershed as well as wildlife and livestock have benefited as shown by ongoing monitoring studies and rangeland health assessment. Current objectives are being met. Site-specific NEPA analysis occurs prior to performing vegetation treatments. This gives the public a chance to comment on each individual treatment project as it is proposed."	Vegetation
Charles Schelz		The BLM must provide a list of proposed tteatments, a detailed descriptiun uf them, and the direct, indirect, and cumulative impacts that they entail, including the additional impacts that climate change would have on these proposed vegetation treatments. The BLM must also provide examples of past "vegetation treatments" that have been a success, by providing data and analysis that show these treated areas have attained the desired future condition and sustainability by means of these treatments.	"Vegetative treatments were addressed in the Vegetation Treatments on Bureau of Land Management Lands in 17 Western States PER in 2007. General impacts from these treatments were adequately described and analyzed in that document. Watershed as well as wildlife and livestock have benefited as shown by ongoing monitoring studies and rangeland health assessment. Current objectives are being met. Site-specific NEPA analysis occurs prior to performing vegetation treatments. This gives the public a chance to comment on each individual treatment project as it is proposed."	Vegetation

Commentor	Affiliation	Comment	Comment Summary Response	Category
Charles Schelz		The BLM must include an analysis of why particular habitats have become degraded, and provide maps of the locations of degraded areas and proposed "vegetation treatments".	"Vegetative treatments were addressed in the Vegetation Treatments on Bureau of Land Management Lands in 17 Western States PER in 2007. General impacts from these treatments were adequately described and analyzed in that document. Watershed as well as wildlife and livestock have benefited as shown by ongoing monitoring studies and rangeland health assessment. Current objectives are being met. Site-specific NEPA analysis occurs prior to performing vegetation treatments. This gives the public a chance to comment on each individual treatment project as it is proposed."	Vegetation
Charles Schelz		Casting the vague term "vegetation treatments" as the remedy to the poor condition of the vegetation and related ecosystems on public lands is arbitrary, and in direct violation ofNEPA, and must not be used in this Richfield DRMP/EIS.	Implementation actions for vegetation treatments include identification of site-specific vegetation management practices such as vegetation treatments, or manipulation methods (including fuels treatments) to achieve desired conditions. Site-specific NEPA analysis would occur prior to performing vegetation treatments. This would give the public a chance to comment on each individual treatment project as it is proposed.	Vegetation
Charles Schelz		This DRMP/EIS presumes that grasshoppers, Mormon Crickets and other insects are bad for the environment and therefore must be controlled through insecticide applications, but it presents no evidence that these species are actually an environmental problem, and there is no mention of altemative control techniques.	Grass hoppers and crickets are only presumed to be bad for the environment when they exceed 9 per square yard (Economic threshold). This determination is made by APHIS personnel, who also complete the site-specific NEPA analysis. Not all infestations are treated, given limitations on access and funding. Areas near agricultural land are given priority over other land. Most control is done with chemicals, with Dimilin being the chemical of choice. Location and size of infestations is determined by environmental factors. These insects are known to defoliate brush and trees causing their death and causing an increase in cheatgrass, which is detrimental to the environment.	Vegetation
Charles Schelz		Thus, the BLM must limit its use of pesticides to control insect populations to only extreme cases where it is certain there are no other control altematives and the damage will be widespread and counter to "ecosystem management' principles.	Grass hoppers and crickets are only presumed to be bad for the environment when they exceed 9 per square yard (Economic threshold). This determination is made by APHIS personnel, who also complete the site-specific NEPA analysis. Not all infestations are treated, given limitations on access and funding. Areas near agricultural land are given priority over other land. Most control is done with chemicals, with Dimilin being the chemical of choice. Location and size of infestations is determined by environmental factors. These insects are known to defoliate brush and trees causing their death and causing an increase in cheatgrass, which is detrimental to the environment.	Vegetation
Charles Schelz		The BLM must define "sustainable" for the various vegetation communities and use this definition in planning activities.	See sustained-yield in the glossary in the Draft RMP-EIS Volume II, page G-18. The Final RMP-EIS will be modified to include a definition for sustainability.	Vegetation
Charles Schelz		In this DRMP/EIS, the BLM has not provided clear and measurable "Desired Future Conditions" for each vegetation community in the Richfield planning area.	The RMP includes general landscape level goals for vegetation communities. More specific measurable objectives are identified on a site-specific basis using the ecological site descriptions defined by the NRCS and assessed using the rangeland health assessment process. Desired conditions is defined in the glossary, this terminology will be corrected in the Final RMP-EIS.	Vegetation
Charles Schelz		Where are the studies and analyses that show that there is excessive hazardous fuel on 1,472,000 acres, or even 520,000 acres in the Richfield planning area? The DRMP/EIS fails to include maps, a list of locations or areas where hazardous fuels are a problem in the planning	The management action to perform vegetation treatments on up to 1,472,000 acres over the life of the plan is designed to give BLM management flexibility in performing vegetation treatments. As stated in on page 2-15 of Alternative B Chapter 2 of the Draft RMP-EIS, the treatment of 73,600 acres is the maximum	Vegetation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		area, and information for each area that discloses the measured fuel loads and reasons why the fuel load needs reducing.	average amount of acres that would potentially be treated annually. This average is based on the ecological threshold that the vegetation communities are adapted to based on the research contained in the administrative record. This research is summarized in Table 3-17 which identifies the thresholds of disturbance for the 20 year planning window for each vegetation type under both frequent and infrequent disturbance regimes.	
Charles Schelz		Thus, this Richfield DRMP/EIS must include drought-specific management strategies for resource protection.	Grazing Regulations provide measures for grazing relief during drought (43 CFR 4110.3-2). Specific strategies to mitigate drought effects are addressed on a site-specifc basis based on available forage and plant condition.	Vegetation
Charles Schelz		Page 3-53, 2nd Paragraph: Here it is claimed that research has shown that the forest, woodland, and rangeland ecosystems are not functioning properly. From this statement it can be assumed that the BLM is referring to all vegetation communities within the Richfield planning area, and that the reason for this statement is that apparently these ecosystems would not be able to recover from a predicted crown or catastrophic fire. The BLM must provide the research references that support these statements regarding the vegetation communities in the Richfield planning area.	As stated in the Draft RMP/EIS Chapter 3 page 3-53, "Appendix 6 of the Draft RMP/EIS contains detailed information concerning the fire ecology of each major vegetation cover type potentially affected by the decisions made in this" EIS. The detailed information includes extensive references to support these statements. Additionally, section 3.3.11 of the Draft RMP/EIS Chapter 3 describes the nature of wildland fire in the Richfield Field Office, showing how the past fires have not functioned as described in Appendix 6.	Vegetation
Charles Schelz		Page 4-39, 1st Paragraph: The "vegetation treatments" referred to in this paragraph must be mrle specifically described because diffclent treatments have various impacts on the environment.	Implementation actions for vegetation treatments include identification of site-specific vegetation management practices such as vegetation treatments, or manipulation methods (including fuels treatments) to achieve desired conditions. Site-specific NEPA analysis would occur prior to performing vegetation treatments. This would give the public a chance to comment on each individual treatment project as it is proposed.	Vegetation
Charles Schelz		Page 4-51, 6th Paragraph: Here there is no indication of how much soil disturbance will take place. There is only a weak reference to following BMP's to protect soils and thus impacts will be minimal. Again, this is not an analysis, it is not even an attempt to list any impacts or extent of impacts. This is a direct violation of NEPA.	The impacts in this section should not address soil disturbance, as this analysis addresses impacts to vegeation from the soils management actions in chapter 2 of the Draft RMP/EIS.	Vegetation
Charles Schelz		Page 4-40, 3r d Paragraph: This section states: "Since germination is highest where seeds are covered by soil and protected from erosion, and where moisture is held, treatment methods that disturb soils often have higher success rates compared to those methods that do not disturb soils." This idea is wrong and completely contrary to the scientific community. Where does this information come from? There are no references cited.	It is common knowledge that most seeds germinate better when protected from the elements, as evidenced by controlled environments (e.g., gardens, lawns, landscaping). In semi-arid and desert ecosystems, seeds that are not protected by cover from the upper soil horizon are either consumed by wildlife, removed from the site through erosion, or become sterile due to exposure. BLM's experince in the Richfield Field Office is that the statement as presented is accurate. The commentor provides no research that indicates the statement is incorrect.	Vegetation
Charles Schelz		Page 4-41, 4th Paragraph: This paragraph discusses.this type of treatment as if it will be used only within forests, yet forests make up less than 5% of the Richfield planning area. Will mechanical vegetation treatments not be used in woodlands, desert shrub, or sagebrush, which make up over 90% of the planning area?	Nothing in the Draft RMP/EIS limits mechanical treatments to forest vegetation types. Mechanical treatments could be considered for use in most vegetation types. The document was edited for clarity.	Vegetation
Charles Schelz		Page 4-41, 6th Paragraph: The BLM must be more specific about its	"Vegetative treatments were addressed in the Vegetation Treatments on Bureau	Vegetation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		plans in the Richfield planning area in this DRMP/EIS. Specific information about location, extent of treatment, target species, chemicals that will be used, goals and objectives of the treatments, etc. must be included in this DRMP/EIS in order for the public and management to determine possible adverse direct, indirect, and cumulative impacts.	of Land Management Lands in 17 Western States PER in 2007. General impacts from these treatments were adequately described and analyzed in that document. Watershed as well as wildlife and livestock have benefited as shown by ongoing monitoring studies and rangeland health assessment. Current objectives are being met. Site-specific NEPA analysis occurs prior to performing vegetation treatments. This gives the public a chance to comment on each individual treatment project as it is proposed."	
Charles Schelz		On page 4-44, this DRMP also admits that these activities will have the following indirect impacts: "Indirect effects would include reduced soil infiltration, increased erosion and sedimentation, increased soil surface temperatures, and short or long-term changes in species composition and/or community structure." But throughout the DRMP the BLM dismisses these impacts as insignificant because the harvesting of invading pinyon-juniper would be great for the ecosystem, even though the pinyon-juniper invasion probably only constitutes less than 5% of the planning area open to harvesting. This is not an adequate impact assessment. The BLM must provide an analysis of the direct, indirect, and cumulative impacts of harvesting wood products on the ecosystem of the planning area.	The language in this paragraph was revised to clarify the impacts being addressed. In addition, the Draft RMP/EIS Chapter 3 section for forests and woodlands was modified to include updated trend information on the use of forest and woodland products. The magnitude of use is very low in relation to the size of the pinyon-juniper vegetation type. As presented in the Draft RMP/EIS Chapter 3 Table 3-17, pinyon-juniper has increased by approximately 155% compared to the estimated historic acreages.	Vegetation
Charles Schelz		Page 4-172, 4th Paragraph: Using "vegetation treatments" on an average of 73,600 acres per year for the life of this Richfield RMP is excessive. This DRMP/EIS must better analyze and explain the reasons for the need of treating over 70% of the Richfield planning at area. The direct, indirect, and cumulative impacts of these treatments must also be analyzed in more detail in this DRMP/EIS.	The RMP sets the goals and objectives for prioritizing vegetation treatments. The planning handbook (BLM-H-1601-1) requires identifying desired outcomes for vegetative resources, including the desired mix of vegetative types, structural stages, and landscape and riparian functions. Implementation actions for vegetation treatments include identification of site-specific vegetation management practices such as vegetation treatments, or manipulation methods (including fuels treatments) to achieve desired plant communities. Site-specific NEPA analysis would occur prior to performing vegetation treatments. This would give the public a chance to comment on each individual treatment project as it is proposed.	Vegetation
Charles Schelz		Page 4-173, 3rd Paragraph: How would surface disturbing activities contribute to decreased air quality, soil erosion, soil compaction, introduction and spread of invasive and noxious weeds, crushing of plants, and habitat degradation? All of these adverse impacts would most certainly increase.	The document has been clarified.	Vegetation
Charles Schelz		The results of past monitoring, showing trends, must be presented in order for the public to determine if these areas are being properly managed, and if not, what mitigation needs to be done to improve conditions.	The water quality monitoring data from the Utah Division of Water Quality was used in the Draft RMP/EIS. The information can be found on the STORET web page at http://ww.epa.gov/storet/dw_home.html.	Water Resources
Charles Schelz		Page 4-33, 5th Paragraph: The actions referred to may "minimize" the impacts of grazing on water quality but they will not lower the impact to an acceptable level. Again this is not an analysis, and the BLM fails to show any data or monitoring results that indicate that the use of the Fundamentals of Rangeland Health and the Standards and Guidelines	The Fundamentals of Rangeland Health and the Standards and Guidelines for Grazing would minimize impacts from livestock grazing. Water quality impairment is minimized with proper stocking rates and proper management practices. If livestock grazing is determined to be the source of impairment, the 43 CFR 4180 requires corrective action to be initiated within one year of determination of	Water Resources

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		for Grazing Administration are effective in the Richfield planning area.	impairment. The impact analysis assumes the BLM will comply with all law and regulations, inlcuding this one.	
Charles Schelz		In this DRMP/EIS the BLM does not present any of their results regarding the measurement of nutrient loads, total dissolved solids, chemical constituents, and fecal coliform. Nor does the BLM mention any program for or results of monitoring macro-invertebrate communities that indicate water quality meets aquatic objectives. These indicators, established by the BLM, will help the public and management determine if there are impacts from OHV use in floodplains and riparian areas.	The water quality monitoring data from the Utah Division of Water Quality was used in the Draft RMP/EIS. The information can be found on the STORET web page at http://ww.epa.gov/storet/dw_home.html.	Water Resources
Charles Schelz		Page 4-33, 8th Paragraph: There is no mention: in this section of the impacts of Rightof- Ways (ROW's) and Easements. These could have potentially widespread and adverse impacts on water resources due to the erosion caused by vegetation loss and surface disturbance.	Prior to issuance of the right-of-way, impacts to water resources are assessed during implementation level site-specific NEPA analysis.	Water Resources
Charles Schelz		The BLM must plan for the protection of migratory birds by listing and mapping important habitat types, and keeping designated OHV routes and other management activities to a minimum in these areas. Natural processes must be allowed in certain areas, unencumbered by management activities or treatments. None of this type of planning is evident in this Richfield DRMP/EIS.	The RMP-EIS includes a range of alternatives for designations (such as wild and scenic rivers, wilderness areas, and areas of critical environmental concern) that would restrict activities and associated impacts to wildlife including migratory birds. As specific projects are proposed, site-specific NEPA analysis, including impacts to migratory birds, will be conducted. Due to the extensive habitat range of migratory birds, information is available but including detailed information in the RMP is impractical. The RMP includes BMPs for raptors (Appendix 10) and for listed species (Appendix 14).	Wildlife and Fish
Charles Schelz		Page 4-156, 4th Paragraph: The BLM dismisses actual analysis of impacts to fish and wildlife by referring to BLM Utah Riparian Policy. The BLM must provide analyses of the direct, indirect, and cumulative impacts ofactivities allowed in and around riparian areas.	This paragraph presents the impacts to fish and wildlife from management of riparian activities (specified in Table 2-5, page 2-15). The impacts on fish and wildlife from activities proposed occurs under each resource use.	Wildlife and Fish
Charles Schelz		Impacts from Livestock Grazing Page 4-174, 2nd Paragraph: The impacts to wildlife from livestock grazing are many and varied, and they are listed in this paragraph. However, in this DRMP/EIS there is absolutely no analysis of these impacts, especially the indirect, and cumulative impacts. These must be included in this Richfield DRMP/EIS.	Impacts to fish and wildlife from livestock grazing management actions is discussed in the Draft RMP on page 4-160, Section 4.3.9. This level of analysis is appropriate for an RMP level document. As specific projects are proposed, site-specific NEPA analysis will be conducted.	Wildlife and Fish
Charles Schelz		Several studies have since substantiated their claim. Lyon (1983) was the first study to report the impact of road density on elk populations. He states, "habitat effectiveness can be expected to decline by at least 25 percent with a density of l mile of road per square mile and by at least 50 percent with two miles of road per square mile. With the Current road density at about 1.3 miles/mi/, the Richfield FO must reduce the amount or roads from 4,176 miles to 2983 miles just to reach the upper limit of acceptability for wildlife protection, and still accept a loss of about 25% of wildlife populations from this factor alone.	Elk inhabit less than half of the Richfield Field Office planning area. In addition, elk herds within the Richfield Field Office are thriving as shown in UDWR and BLM inventory data. Therefore, management actions specific to this issue weren't deemed necessary as habitat fragmentation hasn't shown to affect population numbers for this species.	Wildlife and Fish
Charles Smith		This disconnect is most evident in the decision to essentially eliminate ACEC's from the recommended Alternative B plan. As noted on page ES-1l, FLPMA legislation mandates that the BLM "give priority to the designation and protection of areas of critical environmental concern" in	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection ACEC. The BLM gave full consideration to the designation and preservation ACEC during this land use planning process. Nominations for ACECs from the public were specifically solicited during the	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
		developing or revising land use plans. After carefully reviewing 30 nominations for ACEC status, the Richfield BLM planners identified 16 ACEC's as meeting relevance and importance criteria as potential ACEC's. In the disussion of the nominated ACEC's(Chapter 4, pages 383-454) the Draft plan makes a convincing argument that these ACEC's are needed, as defined by federal legislation, " to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes".	scoping period. A total of 27 ACEC nominations were received and the relevance and importance of each were determined. Two of the ACEC nominations were found to meet both the criteria of relevance and importance and all these were included for special management as proposed ACECs in Proposed RMP. The BLM Manual 1613.23 states that “After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM’s proposals for designation and management of ACECs.” The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.	

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Charles Smith		Fremont Gorge/Cockscomb Potential ACEC: Vegetation (Riparian) Because this ACEC area includes parts of the Fremont River and Fish Creek that have met the criteria for protection as a Wild and Scenic River it is important that the riparian sections in this ACEC receive maximum protection with the buffer zone for protection against surface disturbing activities be 660 feet as listed in Alternative C.	The Fremont River - Fremont Gorge wild and scenic river segment is eligible under Alternative N and suitable under Alternatives B, C and D, and Fish Creek is eligible under Alternative N and suitable under Alternative C and D, providing protections for riparian areas for 1/4 mile from the river, exceeding the commentor's suggestion for 660 feet. The 660 foot protection zone under Alternatives C and D are within the range of riparian management alternatives for the decisionmaker to consider in developing the Proposed RMP and ROD.	Areas of Critical Environmental Concern
Charles Smith		Fremont Gorge/Cockscomb Potential ACEC: Visual Resources. The most significant relevant and important value in this ACEC is the striking beauty of the landscape that a visitor encounters as they enter this gateway to Capitol Reef National Park from the west along highway 24, or from the south over Boulder Mountain along highway 12. I was surprised to see no mention in the current Draft Plan of the national designation of Highway 12 as an All American Road and Scenic Byway Corridor. While this designation provides some protection for maintaining the visual assets of this Byway, ACEC protection of Highway 12 and 24 visual values should be a high priority for maintaining the scenic characteristics of this gateway that are so important for our expanding tourist-based economy in Wayne County. For these reasons, I support the VRN Class designations that are included in Alternative D.	Chapter 3 of the Proposed RMP/Final EIS has been modified to reflect the national desigantion of Highway 12 as an All American Road.	Areas of Critical Environmental Concern
Charles Smith		Fremont Gorge/Cockscomb Potential ACEC: I would also like to have the BLM reassess its statement (page 4-419) that "these lands include no Class A scenery so sale of these lands would have no impact on scenic relative and important values". Almost all of these lands are within the visual corridor that travelers see as they enter the Capitol Reef Gateway on either highways 24 and 12, and they include high buttes that demonstrate the junction between sagebrush grasslands and pinion juniper forests as a beautiful foreground to the exposed red rocks as one nears the park.	Chapter 3 of the Proposed RMP/Final EIS has been modified to reflect the national desigantion of Highway 12 as an All American Road.	Areas of Critical Environmental Concern
Charles Smith		Fremont Gorge/Cockscomb Potential ACEC: Special Designations. Only 8%, of this ACEC overlaps with the existing Fremont Gorge WSA, hence the argument that the WSA will achieve the same goals as the ACEC does not hold here. The ACEC does contain small segments of two eligible Wild and Scenic rivers, and I support Alternative D because it includes the small segment of Fish Creek as well as the Fremont Gorge.	The BLM has separate policies and guidelines as well as criteria for establishing ACECs and WSAs. The differing criteria make it possible that the same acreages will quality as both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies. The values protected by the WSA don't necessarily protect those values found relevant and important for the ACEC process and vice versa.	Areas of Critical Environmental Concern
Charles Smith		On page 4-383 the planners noted that when ACEC's overlap areas that are already protected by more restrictive management special designations, such as WSA's, the ACEC is not necessary because the more restrictive designation prevails. Some BLM planners at the recent public meetings have commented that the ACEC's were eliminated because of this overlap, an argument I cannot accept. Should the Congress eventually remove their support for WSA's, the ACEC would	The BLM has separate policies and guidelines as well as criteria for establishing ACECs and WSAs. The differing criteria make it possible that the same acreages will quality as both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies. The values protected by the WSA don't necessarily protect those values found relevant and important for the ACEC process and vice versa. The relevant and important values of ACECs within or adjacent to WSAs were noted in the ACEC Evaluation (Appendix 1). ACECs are	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
		remain to provide a less restrictive, but certainly an important level of protection.	evaluated and ranked based on the presence or absence of the stated relevant and important values. None of these values include wilderness characteristics. Additionally, the management for the ACECs is limited in scope to protect the relevant and important values, and the BLM maintains that the size of the ACEC areas was appropriate for protection of the relevant and important values identified.	
Chris Castilian ccastilian@hotmail.com		In the Richfield DRMP/EIS, the BLM has failed to adequately consider reasonable access to federal and private minerals and to consider the effects its proposed management strategy will have on current and future oil and gas exploration and development activities, and on the rural economy. A recent study by the University of Utah\'s Bureau of Economic and Business Research found that the average wage for oil and gas exploration and production jobs in Uintah County is $84,795, more than double the county average wage of $39,056. Artificially limiting energy development in the Richfield Planning Area and taking 682,600 acres out of productive use will deny the local economy of similar benefits.	The Draft RMP/EIS discloses areas that are available to be leased, there are reasons why certain parcels of land are not available to be leased such as cultural resources, WSAs, ACECs, and habitat for threatened and endangered plant and animal species. Acres unavailable for oil and gas leasing can not be directly correlated to loss of income or economic benefits.	Minerals and Energy
Chris Castilian ccastilian@hotmail.com		Another area of restrictions I\'m concerned about is the extensive use of blanket winter stipulations in the Preferred Alternative. These substantial winter drilling restrictions will shut out operators for six months, leaving a very limited time for oil and gas activity. Land managers should have the flexibility to approve projects that propose innovative ways to mitigate the impacts on wildlife in exchange for year-round drilling, such as directional drilling projects. With winter stips, a drilling rig has to be relocated at the end of the season, which extends the timeframe for drilling activity from a concentrated period of time to several years. Multi-well pads must be considerably larger when the rig must be removed and reassembled. When a rig can stay on site year round, drill multiple wells, and then leave, less maneuver room on the pad is necessary, and total drilling time is reduced. The winter stips in Alternative B should be revised to give land managers th! is flexibility.	The Draft RMP/EIS includes exceptions for timing limitations on oil and gas leasing (appendix 11). The Final RMP/EIS has been revised to include the following exception for the crucial and high value mule deer and elk habitat timing limitation. "Consider exception if deer and/or elk are not present or if the lessee/operator can demonstrate that adverse impacts can be mitigated."	Minerals and Energy - Oil and Gas
Chris Castilian ccastilian@hotmail.com		I am very concerned about the proposal to manage so-called \"non-Wilderness Study Area (WSA) lands with wilderness characteristics\" to maintain wilderness. There is no justification and no mandate in the Federal Land Policy and Management Act (FLPMA) and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the \"603 Process\" was completed, the agency was done with its Wilderness review. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so would obviate the FLPMA mandate, USC Â§1702 (c) (\"Section 103(c)\"), of multiple use and result in a loss of economic	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
		development in the local community and a denial of energy resources for the state and nation.	enough to provide sufficient latitude for periodic adjustments in use. . .” FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	
Chris Castilian ccastilian@hotmail.com		Extensive use of Visual Resource Management (VRM) classifications is another area of concern in the DRMP. In the Preferred Alternative, 209,000 acres would be designated as VRM Class II, which severely restricts the surface disturbance from oil and gas activities and renders in-fill development virtually impossible. Large portions of the Covenant Field, the portion of the planning area with the highest potential for oil and gas, would be designated as Class II. This restriction on the Covenant Field should be removed to ensure this vital energy resource is accessible to Utah and the nation.	BLM currently manages some of the Covenant Field as VRM Class II. The Richfield Field Office has developed and implemented best maangement practices (BMPs) for visual impacts associated with oil and gas development.	Visual Resources
Chris Montague	Grover landowners	Lands Identified for Disposal (Sale or Trade), Specifically Tract 19 and 20 Table A5-4) in the Grover Area We believe that these two parcels should be removed from the disposal list for the following reasons: 1. These parcels do not meet any basic "disposal criteria" for Land Sales under the Federal Land Policy and Management Act of 1973, Sec. 203. FLPMA Criteria (1) states that "such tract because of its location or other characteristics is difficult and uneconomic to manage as part of the public lands, and is not suitable for management by another Federal department or agency may be considered for sale because of its location." These tracts clearly do not meet this criteria. They are not "difficult or uneconomic to manage", costing the BLM neither extra staff time or budgetary expense. The BLM has, to my knowledge, not explored management by the US Forest Service.	The method used to identify the parcels considered for disposal (Appendix 5) included: FLPMA Section 203 sales criteria, land tenure adjustment criteria (identified in Appendix 5), a BLM inter-disciplinary team review of land status ownership maps, historical index, the LR 2000 database, and resource information. BLM maintains that these tracts meet the disposal criteria based on this review. The Forest Service has not expressed interest in these parcels to date. Local, county, state, or federal governments may apply for any of the parcels identified in the tables for FLPMA Section 203 sale or other public land under other current authorities for public purposes. Preference is generally given to applicants that would provide a public benefit.	Lands and Realty
Chris Montague	Grover landowners	Lands Identified for Disposal (Sale or Trade), Specifically Tract 19 and 20 Table A5-4) in the Grover Area We believe that these two parcels should be removed from the disposal list for the following reasons: FLPMA Criteria (2) states that "such tract was acquired for a specific purpose and the tract is no longer required for that or any other purpose." Again, these tracts clearly do not meet this criteria. They were never specifically acquired by the BLM for any specific purpose and are not any different than millions of other similar BLM acres in this regard. One might argue, however, that these parcels now have a real reason/purpose for BLM to retain them - occurrences of rare species,	The method used to identify the parcels considered for disposal (Appendix 5) included: FLPMA Section 203 sales criteria, land tenure adjustment criteria (identified in Appendix 5), a BLM inter-disciplinary team review of land status ownership maps, historical index, the LR 2000 database, and resource information. BLM maintains that these tracts meet the disposal criteria based on this review. Conservation Strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		etc. (see comments following this section).	Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	
Chris Montague	Grover landowners	Lands Identified for Disposal (Sale or Trade), Specifically Tract 19 and 20 Table A5-4) in the Grover Area We believe that these two parcels should be removed from the disposal list for the following reasons: FLPMA Criteria (3) states that "disposal of such tract will serve important public objectives, including but not limited to, expansion of communities and economic development, which cannot be achieved prudently or feasibly on land other than public land and which outweigh other public objectives and values, including, but not limited to, recreationand scenic values, which would be served by maintaining such tract in Federal ownership. " The obvious intent of FLPMA in this criteria is to respond to community requests for expansion and to create additional economic development/tax base through land development. The community of Grover, within which the two parcels lie, is not requesting this disposal, and in fact, is overwhelmingly opposed to the sale/trade ofthese tracts by the BLM. There is adequate private land for expansion of the community of Grover. The community does not now (and has never) relied on this type of economic development for its survival. There are no "important public objectives" being served by disposal - certainly none which would "outweigh other public objectives and values, including, but not limitedto, recreation and scenic values... "	The method used to identify the parcels considered for disposal (Appendix 5) included: FLPMA Section 203 sales criteria, land tenure adjustment criteria (identified in Appendix 5), a BLM inter-disciplinary team review of land status ownership maps, historical index, the LR 2000 database, and resource information. BLM maintains that these tracts meet the disposal criteria based on this review. BLM disposal action doesn't mean conflicting development would occur. Future use of the land would need to meet existing planning and zoning restrictions.	Lands and Realty
Chris Montague	Grover landowners	Not only does disposal ofthese tracts not fulfill any important public objectives for the community, but their disposal is actually damaging to the values ofthe community in the following ways: A) Disrupts community atmosphere and rural lifestyle. Sale of these tracts will significantly increase developable ground in the Grover area in one fell swoop. This could have a major effect on the quality of life for current Grover landowners and residents and would disrupt the rural lifestyle (custom and culture) and atmosphere of this quiet area - the way it looks and feels, and the rural character it is struggling to maintain.	The method used to identify the parcels considered for disposal (Appendix 5) included: FLPMA Section 203 sales criteria, land tenure adjustment criteria (identified in Appendix 5), a BLM inter-disciplinary team review of land status ownership maps, historical index, the LR 2000 database, and resource information. BLM maintains that these tracts meet the disposal criteria based on this review. BLM disposal action doesn't mean conflicting development would occur. Future use of the land would need to meet existing planning and zoning restrictions.	Lands and Realty
Chris Montague	Grover landowners	Not only does disposal ofthese tracts not fulfill any important public objectives for the community, but their disposal is actually damaging to the values of the community in the following ways: B) Overturns local	The method used to identify the parcels considered for disposal (Appendix 5) included: FLPMA Section 203 sales criteria, land tenure adjustment criteria (identified in Appendix 5), a BLM inter-disciplinary team review of land status	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		planning intentions. By promoting the development of these parcels of land in a community so small, BLM will in essence be assuming the role of Grover Community Planning Agency - dictating the future and quality of life for area residents and violating the spirit of the adopted zoning plan, which is meant to direct and concentrate new development closely around existing incorporated towns - towns such as Torrey, Loa, Lyman and especially Fremont (which expressed interest in BLM sale/exchange of properties near their community and on the bench above), who are hungry for new development of this scale. Development at locations near to these towns would not disrupt their community atmosphere, or require major new services added to their capacity for fire protection, road maintenance, infrastructure, law enforcement, and garbage collection and disposal.	ownership maps, historical index, the LR 2000 database, and resource information. BLM maintains that these tracts meet the disposal criteria based on this review. Local, county, state, or federal governments may apply for any of the parcels identified in the tables for FLPMA Section 203 sale or other public land under other current authorities for public purposes. Preference is generally given to applicants that would provide a public benefit. BLM disposal action doesn't mean conflicting development would occur. Future use of the land would need to meet existing planning and zoning restrictions.	
Chris Montague	Grover landowners	Not only does disposal of these tracts not fulfill any important public objectives for the community, but their disposal is actually damaging to the values of the community in the following ways: C) Major scenic value degradation. Until this proposal, the Grover area settlement (and other areas that would be impacted by an exchange) has consisted almost entirely of scattered single cabins, mostly out of sight of each other and almost all out of sight of the roads and main highway. Development of this land would certainly bring building and development within sight of many current landowners and probably within sight of Highway 12 - one of the state's most spectacular and breathtaking roadways and a designated Scenic Byway!All American Highway (a designation supported and promoted by BLM and 3 other federal agencies, 6 cities, 2 counties, 4 Utah agencies.Z National Parks, 1 Monument, multiple counties and communities).	Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action.” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty
Chris Montague	Grover landowners	Not only does disposal of these tracts not fulfill any important public objectives for the community, but their disposal is actually damaging to the values of the community in the following ways: D) Environmental/Wildlife degradation. The BLM properties in question are at the same time both rugged and fragile. New roads in the proposed tracts would inevitably lead to soil erosion - carried downstream in two streambeds and into the yards and fields of residents lower down in the drainage during heavy rain/flood events. There is a large number of raptors in the immediate area, and known locations of nesting hawks on part of the proposed tracts that would certainly be displaced with any development the sale would bring. Wild turkeys currently using roosting areas and trees along Carcass Creek in the winter months would be displaced. These tracts are considered to be critical mule deer and elk habitat for the area by the Division of Wildlife, providing forage and seclusion - especially in the winter months, as well as providing a linking corridor at all seasons through the private lands in Grover to the Forest	The method used to identify the parcels considered for disposal (Appendix 5) included: FLPMA Section 203 sales criteria, land tenure adjustment criteria (identified in Appendix 5), a BLM inter-disciplinary team review of land status ownership maps, historical index, the LR 2000 database, and resource information. BLM maintains that these tracts meet the disposal criteria based on this review. Conservation Strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Service lands above. A sensitive plant species, Beck's bisquitroot (Cymopterus beckii) is known to occur on BLM lands in the Grover area. Additionally, a federally-listed (as Threatened) plant species, Last Chance Townsendia (Townsendia aprica) has been reported on one of the tracts - and likely occurs on other BLM parcels in the vicinity. The BLM is specifically mandated to manage for the long term sustainability of these rare plant species,and the expectation that these unique biological individuals would be better managed through sale or trade does not seem reasonable or likely. All the land in Grover-area BLM sections serves as habitat for elk, mt. lion, bobcat, and numerous other animal and bird species.	specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action" This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	
Chris Montague	Grover landowners	Not only does disposal of these tracts not fulfill any important public objectives for the community, but their disposal is actually damaging to the values of the community in the following ways: E) Water rights/use disruption. Culinary water would have to be supplied for any future development on these properties by drilling wells. From the experiences of many of the private landowners who have built homes literally "next door" or adjacent to these BLM parcels, it is known that water can be a BIG problem - not only locating water (the owners of one property directly "down gradient" from these BLM tracts could not find any water and currently truck in their water), but the well production of a number of other Private landowners is precariously low, is subject to silt and sand in the supply, is very slow to recharge, and can fluctuate widely from year to year. The threat is twofold - not only might these sale tracts be unable to locate their own water at all, but if they do, they will be removing aquifer water "upstream" of dozens of landowners and their homes! This could deplete further an already tenuous water supply for current Grover residents with senior water rights.	Any disposal would recognize valid existing rights. In Section 1.5.2 of the DRMP/DEIS under Planning Criteria, it is noted that: - The RMP will recognize the existence of valid existing rights. - The RMP will comply with applicable laws, regulations, executive orders, and BLM supplemental program guidance. - BLM will consider the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity. Valid existing rights include water rights and all applicable laws include State water laws. BLM disposal action doesn't mean conflicting development would occur. Future use of the land would need to meet existing planning and zoning restrictions.	Lands and Realty
Chris Montague	Grover landowners	Not only does disposal of these tracts not fulfill any important public objectives for the community, but their disposal is actually damaging to the values of the community in the following ways: F) Disruption of historic community uses. The public and local residents have for generations used these BLM public lands for recreation and livelihood - hunting, hiking and grazing. They would cease to be available for these public purposes once BLM sold them to private owners.	Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: "Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action." This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty
Cindy MacDonald		Based on the remaining wild burro populations and their habitat nationally, as well as the statewide statistics for Utah, I would like to recommend that the BLM nominate the Canyonland HMA and the wild burro population for an Area of Critical Environmental Concern as well,	The BLM ID Team reviewed the Canyonlands HMA for its potential to be an ACEC with the wild burro population as a relevant and important value. The ID Team determined the wild burrs do not meet any of the relevance criteria. Therefore, this area does not qualify as an ACEC and was dropped from further	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
		just so the wild burros and the critical habitat components necessary for their continued preservation will be given top priority within their own HMA.	consideration as an ACEC.	
Cindy MacDonald		Nationally, cumulative impacts to wild burro herds and their habitat under BLMs care since the passage of the Wild Free-Roaming Horse and Burro Act have been devastating and the consistent failure by BLMs Field Offices to examine or identify these impacts on a cumulative level, preferring instead to focus solely on site-specific decisions, has resulted in a national population level that can now qualify wild burro populations and their remaining habitat for Threatened or Endangered Species Status.	The cumulative impact analysis for wild horses and burros is discussed in Section 4.7.4.1.9 of the Draft RMP-EIS. Cumulative impacts to wild burro herds across all BLM lands is outside the scope of this document.	Wild Horses and Burros
Cindy MacDonald		Yet BLM is attempting to use a management technique approved for ONE HMA or HMAs that qualify for herd augmentation in areas of limited resource availability to areas where resources are overwhelmingly abundant as they attempt to justify inequitable and incomparable resource distribution in land use plans and within the HMAs, a direct violation of BLM Policy, CFR 4700.0-6(b).	The HMA is established using natural barriers specific to the landscape. When establishing herd size appropriate management levels (AMLs), BLM considers a range of resources available including vegetation and water sources. This method is in compliance with BLM policy.	Wild Horses and Burros
Cindy MacDonald		However, it is recognized that the Richfield Field Office has yet to monitor the rangeland impacts of wild burro populations at these levels and future monitoring will be necessary to evaluate these new AMLs in relation to the thriving ecological balance with other rangeland users and the productive capacity of the habitat and because of this, the Richfield Office may have to make future adjustments to AMLs depending on the results of monitoring activities within the Canyonland HMA.	BLM has been monitoring the HMA annually since 1986 for both vegetation and moisture. The reccomendations proposed in this RMP are based on this information.	Wild Horses and Burros
Cindy MacDonald		Having personally examined a wide variety of BLM land use plans, rangeland health assessments, AML adjustments, and wild horse and burro gather proposals as well as livestock allotment authorizations, both permanent and TNRs, range improvement projects, state sponsored big game introductions and management plans, recovery plans for Threatened and Endangered Species, Special Status Species and Priority Species, etc., weak points have been noted through BLMs failure to provide specific guidelines regarding evaluations and adjustments to wild equine AMLs that need to be remedied.	BLM has been monitoring the HMA annually since 1986 for both vegetation and moisture. The reccomendations proposed in this RMP are based on this information.	Wild Horses and Burros
Cindy MacDonald		The first consideration must include reported information on the productive capacity of the habitat as this is the limiting factor in the determination of AMLs, and BLM has often failed to report what that capacity is. The Final Resource Management Plan should include the forage and water availability within the Canyonland HMA to firmly establish the resources now available in the HMA so that proper allocations can be distributed in an equitable manner. BLM regulations, CFR 43 4700.0-6(b), require that wild horses and burros shall be considered comparably with other rangeland users in the formulation of land use plans. However, failing to provide the productive capacity of the	It is not within BLM's authority to conduct trials to experiment with the limits of the land. BLM has been monitoring the HMA annually since 1986 for both vegetation and moisture. The recommendations proposed in this RMP is based on this information.	Wild Horses and Burros

Commentor	Affiliation	Comment	Comment Summary Response	Category
		habitat within the land use plans circumvents BLMs and the publics ability to ascertain if this requirement is indeed being met within the land use planning area.		
Cindy MacDonald		For example, what is BLM basing their Alternative wild burro AMLs on? There is a wide variety of AMLs offered within the Draft RMP ranging from 0 to 200 with no reports or indications of what BLM is basing these AMLs on in relation to the productive capacity of the HMA boundaries.	The AMLs proposed in the RMP were established based on availability of water sources. A range of alternatives for AML is proposed to evaluate impacts as part of the RMP-EIS process. The higher end of the range of alternatives was considered in response to public comment.	Wild Horses and Burros
Cindy MacDonald		Additionally, BLM fails to specify if this AML will include both adults and foals or if this is for an adult population only. Please clarify what age group the proposed AMLs will cover.	BLM counts 6 months and older for counts in accordance with the Wild Horse and Burro Act.	Wild Horses and Burros
Cindy MacDonald		In order to ensure healthy rangelands and resources for all users, including wild burros, BLM needs to clearly report the resources available as expressed in forage production per acre in its most abundant and limiting measurements (such as in drought) as well as the total number of water sources identified within the HMA boundaries, which include all natural and artificial water sources, their flow rate as expressed in gallons per hour, and the percentages necessary for exclusive use by the wild burro populations of these water sources that will be required to sustain healthy herds at the various AMLs proposed.	BLM based the decisions proposed in the plan on best available information.	Wild Horses and Burros
Cindy MacDonald		Secondly, BLM is required to manage wild equine populations at optimum levels while still ensuring a thriving ecological balance with other rangeland users. However, BLM has often exempted themselves from reporting any statistics that would indicate what comprises this balance.	BLM has been monitoring the HMA annually since 1986 for both vegetation and moisture. The recommendations proposed in this RMP are based on this information.	Wild Horses and Burros
Cindy MacDonald		To be considered comparable to other resources, BLM must clearly establish firm guidelines on reporting all significant rangeland users so as to properly measure the multifaceted impacts and utilization levels to available resources within the HMA.	BLM monitors the HMA annually for vegetation and moisture to ensure AML limits are within recommended guidelines.	Wild Horses and Burros
Cindy MacDonald		For example, BLM has cited a concern within the Draft RMP that wild burro AMLs of 200 may cause increased competition with wildlife in the area, specifically big game species such as bighorn sheep. Yet they have failed to identify what the current or future population objectives of big game species now inhabiting or being planned for introduction within the HMA as well as providing no limitations of these species within the planning area based on the productive capacity of the habitat. Omitting information about these well document significant users of resources such as elk, pronghorn antelope, moose, mule deer and of course, bighorn, is a abdication of proper planning within the land use plan area and must be addressed through reporting of current population levels within the Canyonland HMA as well as setting limits on big game species resource authorizations to prevent unlimited growth for the purpose of expanding hunting revenue at the expense of viable wild burro herds. The purpose of requiring an examination of all big game	UDWR establishes and controls big game population levels. BLM can only control AML through monitoring of vegetation and water sources and herd size census counts.	Wild Horses and Burros

Commentor	Affiliation	Comment	Comment Summary Response	Category
		species affecting the wild burro populations in the Canyonland HMA is in order to comply with the Federal Lands Management Policy Act that requires BLM to consider the following in their management actions. 1. Big game species should be defined as mule deer, pronghorn antelope, bighorn sheep, elk, moose mountain goats and bison. 2. Inclusion within the Final RMP of the current estimated big game populations and population objectives that affect the wild burro populations and their habitat within the Canyonland HMA. 3. Inclusion within the Final RMP of resource allocations for each big game species including maximum AUMs allowed per species and water percentage authorizations for the population objectives within the HMA. 4. All proposals and management actions being considered that affect resource utilization and distribution with special emphasis on water and forage availability should require estimated reported populations of big game species inhabiting, migrating or being introduced into the Canyonland HMA and should be reasonably current – within two years of the proposal. 5. Reporting of all big game species populations within the Richfield Districts jurisdiction, statewide population estimates and national population estimates.		
Cindy MacDonald		Yet, even despite significantly less habitat available to wild horses and burros, livestock still dominate the resource allocations, so much so that the majority of the “approved” populations (AML) BLM has authorized within their protected habitat has put most of the Nations remaining herds at serious risk of inbreeding and non self-sustaining populations.	Livestock grazing on 30% of the Canyonlands HMA has been relinquished to the Canyonland Trust, with no plans for livestock grazing to occur in these areas. AML's are established to maintain a viable herd unit.	Wild Horses and Burros
Claire Moseley	Public Lands Advocacy	On page 4-68 under Alternative N, it is stated over 1.6 million acres are open to oil and gas leasing subject to standard lease terms and that surface disturbance from seismic operations supporting oil and gas leases could occur even though upon identification, seismic operations should be able to avoid all the identified sites. Hundreds of thousands of miles of geophysical data have been acquired in the Rockies with virtually no resulting environmental disturbance or damage. Given the fact that geophysical exploration is subject to the terms and conditions of BLM's permitting process, it is highly unlikely that geophysical acquisition would result in surface disturbance of any resources, including cultural resources.	The DRMP/DEIS only implies that soil disturbance MAY result from seismic operations during oil and gas leasing. The term "could" means expressing possibility: used to indicate that something is possibly true or happening in the future. Also, the DRMP/DEIS acknowledges that seismic operations should be able to avoid identified cultural sites.	Cultural Resources
Claire Moseley	Public Lands Advocacy	In Table 2.6, Cultural Resource Decisions, BLM indicates its first priority is to "Preserve and protect significant cultural resources and ensure that they are available for appropriate uses by present and future generations." Table 2.7 BLM states it will "mitigate adverse impacts to vertebrate and significant non-vertebrate paleontological resources resulting from surface disturbing activities." Comment: We agree that BLM must preserve and protect significant cultural and paleontological resources. However, we can find no discussion as to what constitutes a "significant cultural resource." Chapter 4 of -the DEIS indicates current	“Significant” cultural resources are defined by law as those that are eligible for the National Register of Historic Places. The National Register regulations are in 36 CFR 800, with the eligibility criteria in section 60.4	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		BLM policy is to categorize cultural resources according to their potential or best use and cites six use categories outlined in the BLM 8110 manual. The DEIS claims that in addition to providing clear management direction for specific classes of sites, allocation of cultural resources to these use categories also allows land managers to address the values of cultural resources before they are threatened by an undertaking. However, it is still unclear how BLM will determine a site's significance. This is of particular concern since BLM admits less than 1 percent of the study area has been inventoried. We recommend that specific criteria be identified in the FEIS that allows the public to understand how BLM makes significance determinations. Such information would also allow oil and gas operators to better plan their activities with respect to decisions to avoid or mitigate cultural resources that could exist in an area of proposed activity as revealed by the cultural survey conducted before activities commence.		
Claire Moseley	Public Lands Advocacy	On Page 4-68, the DEIS indicates that "cultural resource values on 1,236,500 acres (58% of the RFO) open to oil and gas leasing subject to the standard terms and conditions on the lease form and on 409,200 acres (19% of the RFO) open to leasing subject to moderate constraints could be impacted by oil and gas leasing. " Comment: We understand that BLM means that cultural resources could be impacted by decisions to exercise lease rights. However, the language needs to be modified to acknowledge that leases in themselves do not result in impacts to any resource values. The only impacts that would result would be a decision by a lessee to conduct oil and gas exploration and development activities on a ease.	The term "could" means expressing possibility: used to indicate that something is possibly true or happening in the future. The commentor acknowledges that lessees' actions MAY result in impacts.	Cultural Resources
Claire Moseley	Public Lands Advocacy	On page 4-497, the DEIS described "Unavoidable Adverse Impacts" associated with implementation of the RMP. In the first paragraph under this section, the DEIS states, "…Permanent conversion of vegetation resources to other uses such as transportation and mineral and energy development reduces the quantity of vegetation resources." In the second paragraph, the DEIS states, "…Because some specific wildlife habitats coincide with the known areas of oil and gas potential, impacts to these habitats are unavoidable under current BLM policy to foster oil and gas development. However, permanent oil and gas well sites and their associated infrastructure are mitigated to the extent possible to minimize impacts and avoid wildlife habitat values when possible." Comment: We acknowledge that certain aspects of oil and gas development will have somewhat long-term impacts to other resources; nevertheless, it must be recognized that even though they may be long-term none of these impacts are permanent, with the possible exception of roads if the agency or county decides to retain them for access after operations are completed. Interim reclamation is performed on drilling	The text has been revised to state that oil and gas well sites and the conversion of vegetation resources are not permanent, but rather long-term.	Minerals and Energy

Commentor	Affiliation	Comment	Comment Summary Response	Category
		sites, permanent site-specific reclamation is performed when a well is depleted and is plugged and abandoned. In such cases, unneeded facilities are also removed and the sites are fully reclaimed. This fact is demonstrated throughout Utah and the rest of the Rocky Mountain Region. It is usually impossible to detect where past oil and gas activities have occurred particularly with respect to current reclamation technologies and requirements. In short, even though oil and gas development may seem to be permanent, it is not and this fact must be recognized throughout the RMP and its associated analysis.		
Claire Moseley	Public Lands Advocacy	BLM seems to have overlooked the direction contained in Instruction Memorandum (IM) 2003-137, Integration of the Energy Policy and Conservation Act (EPCA) Inventory Results into the Land Use Planning Process, to balance environmentally responsible energy development with sensitive resources. According to this IM, the RFO is also required to review all current oil and gas lease stipulations to make sure their intent is clearly stated and that stipulations utilized are the least restrictive necessary to accomplish the desired protection. Moreover, the IM directs that stipulations not necessary to accomplish the desired resource protection be modified or dropped through the planning process.	According to BLM policy, the least restrictive stipulations needed to protect resource values would be applied. The Draft RMP/EIS considered and analyzed a range of alternatives.	Minerals and Energy - Oil and Gas
Claire Moseley	Public Lands Advocacy	On table 2-19, Energy and Mineral Decisions, the DEIS states that Geophysical operations under 43 CFR 3150 are subject to the oil and g-as leasing restrictions with the following exception: • Geophysical operations proposed for lands that are designated as NSO or closed to leasing may be considered for approval when (1) The circumstances or relative resource values in the area have changed, (2) Less restrictive requirements could be developed to protect the resource of concern, or (3) Operations could be conducted without causing unacceptable impacts to the resource of concern. Comment Geophysical data gathering methods involve only "casual use." The definition of "casual use" allows for "activities that involve practices which do not ordinarily lead to any appreciable disturbance or damage to lands, resources, and improvements." As such, the criteria listed above are being inappropriately applied to geophysical activities. Moreover, BLM's regulations ensure that virtually no surface damage is associated with seismic activities. BLM's 3150 Manual provides detailed guidance and requires a site-specific mitigation/operating plan to be in place prior to commencement of activities. In concert with these requirements, evidence of properly conducted seismic surveys fades within a very short time regardless of the technology used. Therefore, it is unnecessary for BLM to limit geophysical exploration activities as described above.	BLM has determined that if the area is closed to oil and gas leasing or has no surface occupancy stipulations then the area would be closed to geophysical operations with the provisions for the exceptions included in Table 2-19 of the Draft RMP/EIS.	Minerals and Energy - Oil and Gas
Claire Moseley	Public Lands	On page ~166, BLM indicates it would allow under Alternative N	The projected disturbance of 4,500 acre due to geophysical activities is based on	Minerals and

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Advocacy	geophysical explorations "outside of WSAs and existing ACECs. Geophysical exploration involves the use of OHVs and vehicles to lay geophones, drill shot holes for charges, or to create a sound wave using all-terrain "thumper" vehicles instead of using charges. Vehicles are also used to remove the geophones and reclaim the shot holes if used." The paragraph goes on to say, "Exploration for oil and gas (including coal bed natural gas) may also include the drilling of one or more wells to test for the reservoir and its productive viability. During the exploration phase of drilling, surface disturbing activities include the construction of roads, well pads, reserve pits, and other facilities. Adverse impacts to wildlife species (including disturbance to reproductive and foraging activities, damage to habitat from use of vehicles, and direct mortality of individual animals) may result from surface disturbing geophysical activities. " Comment BLM asserts that similar impacts would result under each Alternative to varying degrees. However, geophysical does not result in adverse impacts to wildlife species or their habitat. For the reasons stated above, we disagree with the assumptions contained in table 4-3 on page 4-101, Reasonably Foreseeable Development Scenario for Oil and Gas, because it is indicated BLM projects a disturbance of 4,500 acres due to geophysical activities. BLM cannot scientifically support this assumption. In addition, the above quote regarding geophysical also addresses exploration drilling for oil and gas as well as construction of roads, pads, pits and other facilities. This discussion of impacts related to oil and gas drilling, although some are short-term in nature, are NOT associated with geophysical activities and must be removed from the Final EIS.	geological conditions, oil and gas potential, and historic data. Appendix 12 of the Draft RMP/EIS further describes the projected disturbance from geophysical activities.	Energy - Oil and Gas
Claire Moseley	Public Lands Advocacy	BLM projects a total of 8,180 acres would be modified in relation to 454 wells (3,080 acres of surface disturbance from drilling and production activities and 4,500 acres from geophysical exploration activities). Comment The analysis is skewed because geophysical activities will not result in any long-term disturbance or impacts to wildlife and its habitat. Therefore, this table must be revised to reflect that BLM projects only 3,080 acres of surface disturbance associated with oil and gas activities. Second, BLM has not clarified which of these impacts would be short-term, such as drill pads and pits, or longer-term, such as constructed roads and facilities. It is inappropriate to assume short and long-term activities would have the same impact on visual and other resource values.	Chapter 4 of the Draft RMP/EIS states that surface disturbance associated with geophysical operations are limited. The estimated acres disturbed per linear mile range from 0.007 to 1.2 acres per mile.	Minerals and Energy - Oil and Gas
Claire Moseley	Public Lands Advocacy	NSO Stipulations: The DEIS specifies in several tables, Le., Table 6 and 2-19, Chapter 2, that under the Preferred Alternative B a total of 110,900 acres would be subjected to NSO stipulations as compared to 22,600 acres under Alternative N, the No Action Alternative. The rationale for this significant increase is impossible to discern from the DEIS.	In Alternative B, the increase in NSO stipulations is due to recreation sites, ACECs, scenery classifications and VRM designations.	Minerals and Energy - Oil and Gas

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Nevertheless, an attempt was made to determine why this change was made. It was assumed many of these changes were related to broader application of NSO in wildlife habitat. Comment: BLM needs to reanalyze its figures and incorporate the corrections in the final EIS. At this point, it is impossible to discern what the correct figures are and how future oil and gas operations are Impacted by any of the Alternatives.		
Claire Moseley	Public Lands Advocacy	We also believe that management decisions and research must be combined so that projects are designed to reveal relationships between interventions and outcomes. In other words, AM is a process that should test critical assumptions, and a process should be designed to experimentally compare selected policies or practices. An : example would be seasonal restrictions in 'crucial mule deer winter range'. For AM to be properly applied, BLM would allow the implementation and monitoring of drilling and other 'construction' activities during the November 15 to May 1 seasonally-restricted timeframe.	Land use plan level decisions are not subject to adaptive management. These include the goals and objectives, allowable uses, management actions, and special designations. Plan amendments would be required to change these decisions. Implementation or activity level decisions could be subject to adaptive management. Future activity level plans would follow NEPA procedures and involve the public (see DRMP/DEIS page 2-9).	Other
Claire Moseley	Public Lands Advocacy	Feedback mechanisms need to be created between monitoring results (ecosystem response) and management adjustments. Therefore, it is important for BLM to identify triggers that create a "loop" so that the feedback process is the identification of triggers that create the loop from monitoring results to management changes. A trigger could be a defined habitat loss or a species population increase that would, once reached, set in motion a discussion of a potential changes in management of that resource.	The DRMP/DEIS recommends an adaptive management strategy. The adaptive management process is flexible and generally involves four phases: planning, implementation, monitoring, and evaluation. As the BLM obtains new information, it is able to evaluate monitoring data and other resource information to periodically refine and update desired outcomes (goals and objectives), management actions, and allowable uses. This allows for the continual refinement and improvement of management prescriptions and practices.	Other
Claire Moseley	Public Lands Advocacy	It is legally required that valid existing rights be honored. Therefore, not only is it appropriate to acknowledge them as planning criteria, such acknowledgement must also .be incorporated throughout the entire environmental impact statement and the resulting resource management plan. BLM must also analyze the impacts each alternative will have on existing leases and lessees, particularly given that all the alternatives BLM has proposed would result in sizeable increases in NSO designations. Nowhere has BLM disclosed the impacts these restrictions will have on existing leases and future development of energy resources on these leases, including right-of-way access to existing leases that may be surrounded by new NSO restrictions. We recommend that the final EIS fully address this omission.	Valid existing rights are considered administrative actions by the BLM and do not require a specific planning decision to implement. As noted in DRMP/DEIS Chapter 1 under Issues Addressed Through Policy or Administrative Action and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decision are subject to valid existing rights. The BLM will work with and subject to the agreement of holders of valid existing rights to modify proposed actions or activities to reduce the effect of the actions or activities on resource values and uses. These modifications may be necessary to maintain the choice of alternatives being considered during land use plan development and implementation, and may include appropriate stipulations, relocations, redesigns, or delay of proposed actions.	Other
Claire Moseley	Public Lands Advocacy	The DEIS specifies, "Activities proposed that would not initially meet VRM objectives for the area would be mitigated to the extent needed to meet the objectives. Those activities proposed that could not be mitigated would not be authorized." Comment The DEIS fails to acknowledge that there are valid existing rights in the area that must be honored in accordance with current laws. In particular, the fact existing leases that do not contain special requirements to maintain the new visual quality guidelines cannot be held to the new standard unless	Valid existing rights are considered administrative actions by the BLM and do not require a specific planning decision to implement. As noted in DRMP/DEIS Chapter 1 under Issues Addressed Through Policy or Administrative Action and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decision are subject to valid existing rights. The BLM will work with and subject to the agreement of holders of valid existing rights to modify proposed actions or activities to reduce the effect of the actions or activities on resource values and	Other

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		volunteered by the lessee/operator must be more fully addressed in this same paragraph.	uses. These modifications may be necessary to maintain the choice of alternatives being considered during land use plan development and implementation, and may include appropriate stipulations, relocations, redesigns, or delay of proposed actions.	
Claire Moseley	Public Lands Advocacy	BLM states in Chapter 2 that it will "require on-the-ground paleontological inventories prior to permitting surface disturbing activities in areas where there is a high potential to impact scientifically significant paleontological resources and that it will require paleontological assessments prior• to permitting surface disturbing activities in areas- where there is a moderate potential to impact scientifically significant paleontological resources." And on page 4-67, 4.3.6, the DEIS admits "a comprehensive paleontological resource inventory of the RFO has not been conducted, and the occurrences of most paleontological resources are not known, although a review of paleontological research on formations contained within the RFO has identified the types of fossil resources known to be present." BLM goes on to state "BLM paleontological resource management policy is to identify, evaluate, and, where appropriate, protect scientifically significant paleontological resources, ensuring that proposed land uses, initiated or authorized by BLM, do not inadvertently damage or destroy these resources (BLM Manual 8270, Paleontological Resource Management). Comment: There is no indication as to how BLM will determine the significance of a paleontological resource. As stated previously, it is necessary to include the significance criteria in the FEIS.	All vertebrate fossils are considered significant paleontological resources. Other fossils are considered significant based on the context of the rarity of the individual fossil specimen and current scientific interest.	Paleontological Resources
Claire Moseley	Public Lands Advocacy	In order to effectively use Adaptive Management, BLM has stated it sets specific goals and objectives through desired outcomes. We encourage that these objectives also incorporate economic and social objectives as well as ecological ones.	Adaptive management is a formal, systematic, and rigorous approach to learning from the results of management actions, accommodating change, and improving management. It involves synthesizing existing knowledge, exploring alternative actions, and making explicit forecasts about their results. Management actions and monitoring programs are carefully designed to generate reliable feedback and clarify the reasons underlying results. Actions and objectives are then adjusted based on this feedback and improved understanding to continue to try to achieve the desired outcomes. In addition, decisions, actions, and results are carefully documented and communicated to others, so that knowledge gained through experience is passed on rather than lost when individuals move or leave the organization.	Process and Procedures
Claire Moseley	Public Lands Advocacy	On page 4-109, the DEIS states that for leasable minerals under Alternative B, "The types of impacts experienced as a result of leasable minerals decisions would be similar to those described under Alternative N. However, this alternative proposes more acres of mineral withdrawals (176,200 acres) as compared to Alternatives N or A, which would preclude mineral development in those areas and thus allow less disturbance to visual resources. " Comment This discussion is inaccurate because the 176,00Q-acre withdrawal applies to locatable	Chapter 4 of the PRMP/FEIS has been revised.	Visual Resources

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		minerals rather than leaseable minerals. Furthermore, the discussion fails to identify the types of mitigation tools available used. to reduce impacts on visual resource values such as screening, location of operations, etc, which need to be described in the FEIS.		
Clotilde Barrett		So far this administration has weakened the protection of public lands and done little to prevent global warming. BLM, in its planning for the future could and should reverse this by giving high priority to emission reduction on the land that it administers.	While uncertainties remain about global warming and climate change, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.	Scope of Document
Craig C. Downer ccdowner@yahoo.com		I am supporting Alternative D that will increase the AML of the burros to 200 and requst that you not eliminate either acreage or water for these animals nor that you transfer to toer agencies any portions of the wild burro herd area. Also you should not allow big game interests to monopolize the resources of this burro sanctuary, where the wild burros are to be treated as the "principle" presence according to PL 92-195.	There are adequate vegetation resources to increase the herd size to 120-200, however, water sources are very limited. There is not enough water to support this range of herd size year round. There are no actions in the RMP that would elimate or transfer acreage or water within the HMA. There are no actions in the RMP that would transfer mangement of the wild horses and burros to other agencies. Livestock grazing on 30% of the Canyonlands HMA has been relinquished to the Canyonland Trust, with no plans for livestock grazing to occur in these areas. A detailed plan for the Canyonlands burros is outlined in the AML (Appropriate Management Level). There are no plans to give prioirty to wildlife over burros within the HMA; UDWR manages wildlife populations, BLM's authority is to manage burro populations.	Wild Horses and Burros
Cynthia and Kin Shumway and Pederson		The following comments pertain to table A5-4, tracts 19 and 20, in Grover off Miner's Mountain Road. Tract 19 is the home of a threatened plant species, Last Chance Townsendia, a federally designated plant which requires protection from the BLM as well as the public to sustain and nurture this flora. We would like to see active conservation measures implemented rather than selling this piece of land for development which further requires water we don't have as well as the unnecessary loss of this plant.	Conservation strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty
Cynthia and Kin Shumway and Pederson		Tract 20 is designated as "critical habitat" by the Utah Division of Wildlife Resources, because it provides water through Carcass Creek and Rock Creek attracting good grazing for wildlife, be it turkey, deer, elk, and	Conservation strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		other smaller creatures with whom we share the land.	Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	
Cynthia Smalley		I propose no acreage of water be eliminated through Canyonland HMA and no wild burro range should be transferred to agencies who are not mandated by law to protect them (this includes the wild horses).	There are adequate vegetation resources to increase the herd size to 120-200, however, water sources are very limited. There is not enough water to support this range of herd size year round. There are no actions in the RMP that would elimate or transfer acreage or water within the HMA. There are no actions in the RMP that would transfer mangement of the wild horses and burros to other agencies. Livestock grazing on 30% of the Canyonlands HMA has been relinquished to the Canyonland Trust, with no plans for livestock grazing to occur in these areas. A detailed plan for the Canyonlands burros is outlined in the AML (Appropriate Management Level). There are no plans to give prioirty to wildlife over burros within the HMA; UDWR manages wildlife populations, BLM's authority is to manage burro populations.	Wild Horses and Burros
Cynthia Smalley		I also propose that no big game species be managed as a priority to these wild horses and burros within the HMA.	There are adequate vegetation resources to increase the herd size to 120-200, however, water sources are very limited. There is not enough water to support this range of herd size year round. There are no actions in the RMP that would elimate or transfer acreage or water within the HMA. There are no actions in the RMP that would transfer mangement of the wild horses and burros to other agencies. Livestock grazing on 30% of the Canyonlands HMA has been relinquished to the Canyonland Trust, with no plans for livestock grazing to occur in these areas. A detailed plan for the Canyonlands burros is outlined in the AML (Appropriate Management Level). There are no plans to give prioirty to wildlife over burros within the HMA; UDWR manages wildlife populations, BLM's authority is to manage burro populations.	Wild Horses and Burros
Dale Bartholomew	Public Lands Access Alliance	OHV rights-of-way across SITLA properties: Many designated OHV routes cross properties owned by SITLA. To avoid having these routes closed in the future by sale of these lands, rights-of-way should be placed in public ownership. Programs and funding are in place to accomplish this goal. This opportunity should be noted in the plan.	Page 2-79 of the Draft RMP-EIS specifically notes the opportunity to obtain easements across non-Federal lands.	Lands and Realty
Dale Bartholomew	Public Lands Access Alliance	Mayfield Area: The Mayfield area is relatively small and a number of issues currently exist. With the concentration of 'open' riders in a smaller area this area needs special management attention and SMRA should	In 2008, a botanical survey indicated that rare plants were and would be impacted by an open OHV use area near Mayfield. This open OHV use area has been removed from the Proposed Plan.	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		be considered.		
Dale Bartholomew	Public Lands Access Alliance	OHV use around camping areas and trailheads: A significant problem facing all managers of public lands is the intense and indiscriminate OHV use around dispersed camp areas and some trailheads. It is usually is caused by young, unsupervised riders socializing and testing their skills while the adults are busy or resting in camp. Enforcing closures in these areas is very difficult. A model for managing this type of use has been implemented on the Manti La Sal National Forest in Lake Canyon. Designated routes called "training trails" offer a significant length of sustainable trail within a confined area that provide the experience these young riders are seeking. Offtrail riding has become almost non-existent since these trails were put in place. Some provision for addressing this issue have been mentioned in Appendix 14.	Routes are an implementation issue. Route adjustments, including identifying new routes, will be determined at the implementation level following environmental analysis. The Draft RMP/EIS has been modified to include an appendix that describes how the BLM identified motorized routes. Future implementation level decisions could address route/trail identification for both motorized and non-motorized uses as explained in Appendix 9. This could include changing user type, route/trail alignment, or other management.	Travel Management – OHV Route Identification
Dale Bartholomew	Public Lands Access Alliance	North Hatch Canyon The Big Ridge Ridge Area:«Range 15 East Township 31 South section 14) there is an existing route that will be closed on all the alternatives. This route is important for access to the Big Ridge area, which will remain open for OHV's. With some maintenance this route would be a key route for ATV's and OHM's to access the 19.11 miles of routes on The Big Ridge.	This route was reassessed and would be designated as open to motorized use. The route would provide an alternative for access onto the Big Ridge without traveling through Glen Canyon NRA. It has been noted that the route is currently physically blocked due to a rock fall. Maintenance would be required to reopen this route. BLM will work with Utah State Parks and Garfield County who have expressed interest in performing maintenance on this route.	Travel Management – OHV Route Identification
Dale Bartholomew	Public Lands Access Alliance	Poision Spring. Canyon Burt Mesa Area: (Range 14 East Township 31 South sections 18, 19). The route overlooking the Dirty Devil River should remain open to the point where it becomes impassable approximately 1.2 miles from where it shows closed on Map Dirty Devil Alternative B.	Several routes were analyzed in this area and designated for consistency with other resource decisions of the RMP. Routes were identified utilizing a variety of data sources and route length determined based on that data. This route has been reassessed by BLM staff specialists. Further ground-truthing would be required to extend the route beyond what has been indicated on the route data. This would need to be completed along with site specific NEPA analysis following completion of the RMP.	Travel Management – OHV Route Identification
Dale Bartholomew	Public Lands Access Alliance	Goatwater Springs Area: (Range 12 East Township 30 South section 31) There is a route that is just west of section 32. That goes north to the road north of Goatwater point, that needs to be added to the travel plan for off-highway vehicles to be able to make a loop up sawmill basin road, Wickiup pass, across granite Ridge down to little Egypt. This is not a well known trail but has been in existence for many years. Please see attached map.	This proposed route was not analyzed. Although existing routes have been identified north and south of the private property, new construction would be required to connect these routes, avoiding the private property and a reservoir development. Since new construction is needed, site specific NEPA analysis would need to be completed.	Travel Management – OHV Route Identification
Dale Bartholomew	Public Lands Access Alliance	Granite Wash Area: (Range 11 East Township 30 South sections 25-26) There is a user created trail that connects the routs from poison springs to the road going past goatwater point to sawmill road. This trail is a much better route than the one going down granite creek. This route makes a important connection between poison spring benches and sawmill basin road for a loop route from Little Egypt. Please see attached map.	The BLM has no GPS data for a user created trail in this area. Therefore, this route was not analyzed. Site specific NEPA analysis would need to be completed following RMP completion.	Travel Management – OHV Route Identification
Daniel Davis	Brendell Manufacturi ng Inc.	It is my opinion that your inventory of existing trails in the area around Factory Butte-Caineville is inadequate. I therefore ask that you immediately seek an accurate and complete inventory ofthe existing	The best available route information was used as a starting point for identifying routes/trails. The route inventory process consisted of applying criteria to the route inventory and involved an interdisciplinary team including BLM, Counties,	Transportation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		roads, trails, routes, vehicular ways, mining traces and other man-made disturbances in the area. I and many others would be willing to volunteer our help to gather that information if you should require help.	USFS, State Agencies and other Federal agencies. In addition to the route inventory, routes identified during the public scoping and public comment period were integrated into the baseline route inventory and have been considered in preparing the Proposed RMP/Final EIS.	
Daniel Davis	Brendell Manufacturing Inc.	Also take in consideration how may closed areas the state of Utah has such as Grand Stair Case, National Parks, WSA's, Private Land, Etc. Closing down more lands only promotes more areas to see heavy motorized travel and will eventually shut them down as well.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Darrell McClanahan suwa@suwa.org		The BLM Richfield district contains some of the areas most dear to me. Wonderful places, wild and totally deserving of every protection. It has been my personal experience that ORV riders, 2-, 3- and 4-wheelers,are among the most selfish, rude and environmentally unconscious peope I've had the misfortune to encounter in wild places! Rather than cut roads for them through this marvelous landscape,from which they would no doubt often stray,they should be banned entirely! The vehicles are noisy, smelly,and they utterly decimate the terrain. They kill or drive away wildlife that then must crowd into land already carrying its capacity. That creates stress in wildlife populations causing many problems. I'm sure you realize that damage done to these sensitive areas might never be remediated. I believe the proposed management plan has been prepared in line with the current administration's ultimate goal of eliminating all protections on publicly owned lands and to open them up to absolutely unrestrained private exploitation. Budgets have been cut virtually crippling the ability of staff to properly manage national parks and forests as well as BLM lands. It is time to hold the line until the light of reason once again shines! Protect my children's heritage! The undersigned is a long time hiker, backpacker, biologist/ecologist and recipient of over 200 awards in photographic arts.	The BLM analyzed the impacts of travel management as outlined and described in Chapter 4 of the DRMP/DEIS. Congress recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. Also, specific decibel limitations on motorized vehicles are under the jurisdiction of the Environmental Protection Agency, and a matter of State Law. As stated in 43 CFR 8343.1(b): “No off-road vehicle equipped with a muffler cutout bypass, or similar device, or producing excessive noise exceeding Environmental Protection Agency standards, when established, may be operated on public lands.”	Travel Management – OHV Area Categories
David Bell bell@allwest.net		I am very concerned about closure in the Factory Butte and Caineville area’s. I have explored these area’s by ATV. If ever there was a place that ATV riding should take place, it should be on Factory Butte. There just isn’t much to hurt there, and due to the steepness of the terrain, limitations are geologically in place that limit access. I have not seen anyone out for a hike in the area’s. Please keep these area’s widely accessible for ATV use.	The Factory Butte emergency closure order is independent of and outside the scope of this RMP planning process. Further, the BLM has no duty to obtain input from the public prior to issuing a restriction order under the 43 CFR. Threats to threatened and endangered species in the Factory Butte area were first identified as an issue in the 1982 Henry Mountains MFP. Protection of threatened and endangered species in the Factory Butte area has been a management issue ever since and has been carried forward as a management issue in the RMP process by BLM staff.	Travel Management – OHV Area Categories
David Hubbard		I am strongly opposed to the proposed criteria for Special Recreation Permits: group sizes should not be limited to 10 vehicles. This would inhibit family picnics, scouting activities, and be an undue burden for use of public lands. I also oppose limiting recreation to two hours as this effectively denies the public an opportunity to appreciate natural beauty. I feel very strongly that nature needs more than 2 hours to take in, whether in an OHV, 4x4, or hiking.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	In section 4.2.2, the draft RMP states that it will analyze each of the impact topics describing context, intensity, and duration, as required by NEPA. For the vast majority of resource areas, however, this level of impact analysis was not done. Absent this analysis, it is not possible to access the indirect effects or degree of impact for each alternative.	For many resources (and others where information was unavailable or incomplete), estimates were made regarding the number, type, and significance based on previous surveys and existing knowledge. Additionally, some impacts cannot be quantified given the proposed management actions. Where this gap occurs, impacts are projected in qualitative terms. In many situations, subsequent project-level analysis will provide the opportunity to collect and examine site-specific inventory data required to determine appropriate application of RMP-level guidance. In addition, ongoing inventory efforts by BLM and other agencies within the planning area continue to update and refine information that will be used to implement this RMP.”	Adequacy of Analysis and Alternatives
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	3.3.1.3 Existing Air. Quality According to the draft RMP "Based on existing data, air quality in the planning area is generally good to excellent". However according to the National Park Service's 2005 Annual Performance & Progress Report: Air Quality in National Parks, Class I areas in the region including Capitol Reef have decreasing air quality values. Ozone trends for the region are declining including in Canyonlands National Park. This report also shows every Class I area in Utah was given a "caution" mark for visibility. The RMP should explain how air quality can be rated "good to excellent" while other reports show conflicting conclusions. BLM needs to make a thorough emissions inventory within the resource management area.	Please see the revised air quality resources section of chapter 3 of the PRMP/FEIS.	Air Quality
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	4.2.1 Impacts on ~ iQrua lity The draft RMP states "Quantifying air quality effects is difficult due to the lack of air quality monitoring data for the planning area." However, there is existing regional data including trend data available through a variety of sources including the National Park Service, IMPROVE, WRAP and EPA. The BLM needs to re-evaluate its findings utilizing existing air quality data and make a meaningful analysis of current and future conditions. BLM states that most air quality/visibility issues and sources arise outside of the planning area and are therefore outside the scope of the RMP. For example, there is no mention or analysis of existing or proposed coal fired power plants in the region and their potential impacts on air pollution and visibility. However, NEPA requires the analysis of indirect effects defined in CEQ Sec. 1508.8 (b) as "Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." In order to fulfill, its' NEPA obligation BLM must analyze indirect as well as direct impacts.	Please see the revised air quality impact analysis section of chapter 4 of the PRMP/FEIS.	Air Quality
David Nimkin khevel-	National Parks	4.6.3 Cumulative Impacts by Resource Air Quality The cumulative impacts analysis on air quality fails to adequately address the threats	Please see the revised air quality impact analysis section of chapter 4 of the PRMP/FEIS.	Air Quality

Commentor	Affiliation	Comment	Comment Summary Response	Category
mingo@NPCA.ORG	Conservation Association	from increased energy development in the area. The Four Corners region is seeing an explosion in oil and gas development along with proposed coal fired power plant. There are also four new proposed coal fired power plants across the border in Nevada. Additionally, the surrounding BLM regions of Kanab, Moab and Monticello are releasing resource management plans. Implementation of the Richfield RMP would have impacts that would add to these other past, present and reasonably foreseeable future projects that have not been analyzed. BLM needs to adequately address these impacts and consider reissuing the draft for public review.		
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	Cnapter5 Consultation and Coordination In Chapter 5, BLM states who they are required by Federal law to consult with during an EIS process. BLM has erred in excluding the National Park Service as cooperating agency. They have ignored the directive outline in the Jan. 30,2002 Memorandum fiom James Connaughton, Council on Environmental Quality (CEQ) Chair, which states "The purpose of this Memorandum is to ensure that all Federal agencies are actively considering designation of Federal and non-federal cooperating agencies in the preparation of analyses and documentation required by the National Environmental Policy Act (NEPA), and to ensure that Federal agencies actively participate as cooperating agencies in other agency's NEPA processes. The CEQ regulations addressing cooperating agencies status (40 C.F.R. §§ 1501.6 &1508.5) implement the NEPA mandate that Federal agencies responsible for preparing NEPA analyses and documentation do so "in cooperation with State and local governments" and other agencies with jurisdiction by law or special expertise. (42 U.S.C. $8 433 1 (a), 4332(2)). Despite previous memoranda and guidance fiom CEQ; some agencies remain reluctant to engage other Federal and non-federal agencies as a cooperating agency. In addition, some Federal agencies remain reluctant to assume the role of a cooperating agency, resulting in an inconsistent implementation of NEPA. Studies regarding the eficiency, effectiveness, and value of NEPA analyses conclude that stakeholder involvement is important in ensuring decisionmakers have the environmental information necessary to make informed and timely decisions efficiently." Cooperating agencies are required to be involved in: identification of issues (43 C.F.R. § 1610.4-1); development of planning criteria (43 C.F.R. 16 10.4-2); inventory data and information collection (43 C.F.R. tj 161 0.4-3); analysis of the management situation (43 C.F.R. $ 161 0.4-4); formulation of alternatives (43 C.F.R. $ 1610.4-5); estimating effects of alternatives (43 C.F.R. 1610.4-6); selection of preferred alternative (43 C.F.R. 1610.4-7); . and selection of resource management plan (43 C.F.R. 5 1610.4-7). See also, BLM's "A Desk Guide to Cooperating Agency Relationships." The exclusion of the NPS	The words "...to develop the RMP" were removed from the Final RMP EIS.	Consultation and Coordination

Commentor	Affiliation	Comment	Comment Summary Response	Category
		from cooperating agency status, which has jurisdiction by law over lands that would be impacted by implementation of the RMP, has limited the input from this most qualified agency on the import of effects on Glen Canyon NRA, Canyonlands and Capitol Reef National Parks and on the preferred approach to managing these effects. BLM must invite the National Park Service to act as a cooperating agency for the remainder of the RMP revision, including assessment .of comments and recommendations for revising the Preferred Alternative and selecting an alternative for implementation. In addition, the NPS should be given the opportunity to review the information previously provided to the other cooperating agencies, and then provide input on the analysis of effects and management recommendations pertaining to Glen Canyon NRA, Canyonlands and Capitol Reef National Parks.		
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	3.4.5.1.1 Disposals The draft RMP states, in part, that: "Public lands have potential for disposal when they are isolated and/or difficult to manage." Section 203 of FLPMA states that public land may have the potential for disposal if "its location or other characteristics is difficult and uneconomic to manage as part of the public lands, and is not suitable for management by another Federal department." Map 2-24 identifies four parcels of Public land adjacent to Capitol Reef National Park's eastern boundary (WN17, near Notom, and GAO1, GA02, and GA03 near the Sandy Ranch). Once the methodology is developed, it should be applied to all of identified parcels to determine whether they are suitable for management by another federal agency. It makes little sense to rely on future NEPA processes when existing information could be presented to the public now with regard to the potential for disposing of these lands. It is inappropriate to identify these lands as having potential for disposal when it is known that their location near other federal lands would likely preclude that action.	BLM disposal action doesn't mean conflicting development would occur. Future use of the land would need to meet existing planning and zoning restrictions. These parcels, although adjacent, are located outside the management jurisdiction of the existing National Park boundary. The NPS would need to petition a change in the park boundary if they want to acquire management jurisdiction of these parcels.	Lands and Realty
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	OHV routes These maps (2-12 thru 2-20) do not show the national park boundaries for parks within or adjacent to the planning area. Without this information it is impossible to evaluate the impacts on the affected national parks and their resources. BLM must provide adequate mapping so that the impacts of their alternatives may be analyzed by the public.	Park boundaries have been added to maps.	Maps
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	Proposed Mineral Withdrawals As with OW, mapping is inadequate without defined national park boundaries to access impacts.	Park boundaries have been added to maps.	Maps
David Nimkin khevel-mingo@NPCA.	National Parks Conservatio	Fluid Minerals Again maps 2-34 thru 2-38 are inadequate to access exact proximity to the boundaries of Capitol Reef. However, it does appear that vast areas close to and perhaps adjacent to Capitol Reef	Park boundaries have been added to maps.	Maps

Commentor	Affiliation	Comment	Comment Summary Response	Category
ORG	n Association	are open to standard leasing with only minimal restrictions.		
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	Coal Development Map 3-12 identifies both surface and underground coal potential development adjacent to and within the boundaries of the Waterpocket Fold in Capitol Reef National Park. The RMP fails to identify the impacts on the park fiom this potential development.	Map 3-12 identifies the coal resources within the planning area and does not imply that these coal resources would be developed. As described in Appendix 8 the coal resources within a national park are found to be unsuitable for further leasing consideration.	Minerals and Energy
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	3.3.7.1 Visual Resource Inventory BLM has apparently used visual resource inventories that date back to 1977 with the most recent inventory dated 199 1. FLPMA requires the agency to keep these inventories reasonably up to date. BLM must conduct a comprehensive and current visual resource inventory and base the RMP's impact analysis on this up-to-date inventory.	The Draft RMP/EIS uses the exisiting Visual Resource Inventory. The best available data was used in developing the Draft RMP/EIS.	Visual Resources
David Nimkin khevel-mingo@NPCA.ORG	National Parks Conservation Association	Night skies Night skies are an intrinsic natural resource at the national parks Including Capitol Reef National Park that have great potential to be degraded. This resource is affected both by air quality and light emitting sources. The BLM has completely failed to address the impact that the proposed Sigurd Power Plant or increased oil and gas development would have upon the pristine night skies within the parks. These parks are regarded as having some of the most pristine night skies in the continental United States and have a profound impact on the experiences of visitors. The RMP failed to address the impact on wildlife, particularly migratory birds, fiom degraded nightskies.	The Draft RMP/EIS has been modified to include cumulative impacts from the Sigurd Power Plant. Commentor does not provide information substatiating the claim of the impact of night skies on visitor experiences. The Draft RMP/EIS Appendix 11 does include lease stipulations for oil and gas directly addressing light and sound impats to the National Park Service units adjacent to the RFO.	Visual Resources
David Potter KPOTTERMOM@YAHOO.COM		I am very concerned about the Blm Richfield Resource Mgmt Plan draft. I thin it is way overboard on off road vehciles. My wife and I enjoy wild areas here in Oregon and across the West. We know of repeated information that existing off road users are damaging natural resources, are some places out of control and the BLM can not control this damageing illegal use because it doesn't have nearly enough Rangers. Please do not all any more ORVs within this Plan. And, please crimp down on the existing uses where illegal damage is causing resource damage like noise in sensative areas and erosion. Most Americans are hunters, hikers, bird watchers and campers. They all put up with motor vehcile noises and pollution in their daily lives. They do not want stinking off road vehicles tearing around their public lands. No to more ORVs. Yes to more workable and enforceable restirctions and controls on exisiting off road vehcile useage.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. Enforcement and fines are beyond the scope of this document.	Travel Management – OHV Area Categories
David Smuin	Grand Canyon Trust	None of the proposed alternatives achieve the mandated balance as quoted above, hence they are inadequate. Alternatives N, A and B provide little if any protection and conservation, with a heavy emphasis on "motorized recreation, commodity production and mineral extraction." Alternatives C and D are unbalanced in the other direction. Alternatives A and D tend to be polar opposites, though D in many instances is	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree	Process and Procedures

Commentor	Affiliation	Comment	Comment Summary Response	Category
		closer to middle ground than A. As pointed out above, there is no alternative which truly represents the middle ground amongst the proposed alternatives.	of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. The BLM, in developing the PRMP/FEIS, can chose management actions from within the range of the alternatives presented in the DRMP/DEIS and create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple-use mandate.	
David Smuin	Grand Canyon Trust	The plan states on page 3-16 that only 66% of riparian inventories in the RFO meet the properly functioning condition required. Furthermore, on page 3-65 the Rangeland Health Standards and Guidelines for Grazing Administration require that "riparian and wetland areas be in proper functioning condition". The plan does not explain what will be done to correct this problem and riparian and wetland areas' get no special treatment or designation in the plan.	When an area does not comply with the Standards for Rangeland Health, Standard #2, actions must be implemented within one year to rectify the impairment if the degradation is not the result of natural processes. The specific strategies vary on a case-by-case basis to target the site-specific conditions that have resulted in the impairment. These actions are implementation decisions and are outside the scope of this NEPA document.	Riparian
David Smuin	Grand Canyon Trust	On Page 20 ofthe document "Mancos Shale Literature Review on the Colorado Plateau" a study conducted on the Grand Valley Mancos Shale it is stated that..."The badlands are the least stable landform, releasing more sediment and salt into the runoff than the other landforms." It is accurate to say that the area around Factory Butte is also highly erosive since it consists of badlands formed on the Mancos Shale. It is also accurate and prudent to point out that the crust that covers the Mancos derived soils is effective at minimizing the erosion. The report "Accelerated erosion in areas disturbed by OHV activity in the Mancos Shale badlands of the Factory ButteNorth Caineville Mesa area, Wayne County, Utah" produced by John C Dohrenwend. PhD certainly supports this conclusion. Furthermore, when this crust is disturbed, major erosion will result. Additionally, Jayne Belnap PhD conducted a study and states that the Mancos formations located in the Moab area ".•• were not the most erodable of all the units tested, but they still produced huge amounts of sediment when disturbed (up to 45 times the undisturbed) sediment figure. In addition, they took only 1/3 the wind velocity to move once disturbed. "	BLM understands that the Mancos Shale badlands are unstable and highly erosive, high in salts and selenium, soil crust helps stabilize soil, and that OHVs most likely increase erosion. Dohrenwend's study focused on heavily used steep hillslopes vs. undisturbed hillslopes and indicated that OHV use greatly increases erosion rates. However, many acres of Mancos shale soil are not located on steep slopes but include flat benches, rolling topography, and valleys. Of the steep Mancos shale slopes that are present, not all slopes are used by OHVs, and of the slopes used, many are not used heavily. When considering the total area encompassed by Mancos shale in the Factory Butte area BLM concludes there are many more steep slopes that are not heavily used as opposed to those that are heavily used. In the Factory Butte area there are several scattered Mancos shale areas where concentrated and heavy OHV use occurs on steep slopes. The heaviest use occurs in the Swing Arm City area; and even in that area, the majority of Mancos shale areas containing steep slopes do not receive heavy use. The hillslope acreage impacted by heavy OHV use is relatively small. BLM acknowleges there is increased erosion from steep, heavily ridden hillsides but we do not presently have any quantitative information concerning how many hillslope acres are actually being impacted by heavy OHV use. To what extent total erosion is increased and what impact, if any, it is having on the Fremont River is unknown. We have no water quality data suggesting that OHV use is the cause of any water quality exceedences.	Soil Resources
David Smuin	Grand Canyon Trust	There is also data available that suggests that the crust that covers and stabilizes the Mancos Shale badlands is also relatively low in selenium and other salt generating elements, because the heavy metals and salts are leached out during formation of the crust. These studies also indicate that if this crust is disturbed and blown or washed away, the exposed soil will be higher in the elements that negatively impact the general environment and down gradient water quality. On Page 17 of the Mancos Shale Literature Review material there is a study that states, "Water extracts from un-weathered shale yields much higher quantities	BLM understands that the Mancos Shale badlands are unstable and highly erosive, high in salts and selenium, soil crust helps stabilize soil, and that OHVs most likely increase erosion. We have no water quality data suggesting that OHV use is the cause of any water quality exceedences. Erosion rates usually increase in areas heavily used by OHVs. However, it is unclear to what degree OHVs have increased the rate of erosion over the natural erosion rate. Research efforts attempting to address that issue are currently ongoing in the Swing Arm City area. The lower Fremont River is not listed as being impaired by sediment or selenium. However, water quality standards and criteria adjacent to and	Soil Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		of Na (and higher Mg in most cases) than did comparable extracts from partially weathered shale. "A study conduced on Mancos soils in Colorado and released by the USGS states "Calculations indicate that 4 to 5 kg extractable salt/cu m and 0.2 to 0.4 g extractable Se/cu m are stored in Mancos soil on the NCA. If salt-laden horizons are disturbed and brought to the surface where they are out of quilibrium with the weathering environment, large amounts ofthese salt and Se loads will be available or rapid mobilization. " A letter to the BLM from Carl Adams, an environmental scientist and the Watershed Coordinator for the Utah Division of Water Quality states, pertaining to cross country travel in the Neilson Wash area states, "All of thesefactors indicate that the potential for increased sediment and TDS loading to the Fremont River are higher as a result of unrestricted OHV activity in the Neilson Wash area." Referring to the Blue Hills area, the MFP generated in 1980 by the BLM stated that "In those areas where the (ORV) use is high and the vegetation density is low there will be significant adverse effects on the watershed." A study recently released by the USGS focuses on the Mancos Shale. The document, "Geomorphic Differences Between The Tununk And Bluegate Members Of The Mancos Shale Near Caineville, Utah Wayne County Utah", tells us that the Blue Gate is high in selenium and also has the potential to generate high levels of salt. This selenium and salt poses a threat to the water that flows through the Lower Fremont and Lower Muddy Creek watersheds. These watersheds contribute to the Colorado River water system. This study concludes, "The importance ofadapting management practices to both subtle and obvious differences ofBlue Gate and Tununk landscapes is related to the fragile nature ofthe landscapes, the potentialfor accelerated erosion due to anthropogenic influences, and ultimately to economic and environmental issues related to salinity, selenium, and sediment content ofthe Colorado River. "	downstream of Factory Butte are violated at very low flows when there is no upland runoff. This has persisted for a long period of time, predating the use of OHVs in the area. The commenter quoted Carl Adams saying “All of these factors indicate that the potential for increased sediment and TDS loading to the Fremont River are higher as a result of unrestricted OHV activity in the Neilson Wash area.” He forgot to mention Carl’s next sentence which was “However, based on observations that recent cross country OHV travel has been light there is currently only minimal concern, along with continued monitoring, with its designation as a play area.” He does also say “IF unrestricted OHV use were to substantially increase, particularly within the drainage channels of Neilson Wash, I would anticipate a greater likelihood for increased sediment and TDS loading into the Fremont River.” At the conclusion of Mr. Adams statement to the BLM he said “Based on the result of my observations and review of available information, the BLM’s preferred alternative B, along with continued monitoring, should be protective of water quality within the Fremont River.”	
David Smuin	Grand Canyon Trust	Based on information gleaned from the above referenced sources there are several statements and assumptions within the DRMP that are either questionable or erroneous. Specific instances noted include the following: On page 4-24 of the DRMP regarding the water quality of the Lower Fremont it is stated "Water quality relative to sediment content is best during periods of low flow; water quality relative to chemical content is best during high flow. " And then on page 4-28 it is stated that, "Water quality standards and criteria adjacent to and downstream of Factory Butte are violated at very low flows when there is no upland runoff." This leaves one to wonder which it is, is the water quality best or violated during low flows? Why not just state the truth which is that water quality downstream of Factory Butte is poor and deteriorating. Also, based on the water quality data obtained from the Utah Division of Water Quality	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah’s 303(d) list because a TMDL has been developed and approved. Violations of the water-quality criterion for total dissolved solids (TDS =	Water Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		for water samples taken downstream ofthe Factory Butte area just upstream of the confluence of the Fremont River and Muddy Creek for the period from 1992 to present, the highest levels of selenium occur during periods of high flow; showing that runoff from the highly erodable Mancos badlands is finding its way into the Fremont River. Also when flow rates are compared with the accompanying selenium levels, it was found that there are more occurrences of selenium in violation of allowable standards during periods when the flow is on the high side of average. This contradicts the statement referred to above regarding chemical content of water in the Lower Fremont. It should also be noted that selenium levels were not violated until 1996. Samples were taken beginning in 1992. Since 1996, there has been increasing numbers of selenium violations. These violations coincide with a marked increase in OHV use on the Mancos Shale badlands. Additionally, TDS levels were violated 30 times in the data period, 17 ofthese violations occurred when flows were below average. So roughly half ofthe violations were during high flows, which contradicts the statement, "water quality relative to chemical content is best during high flow." Besides in terms of total load of salt and sediment, the higher flows are undoubtedly contributing more pounds to the Colorado River than the lower flows - dilution is not necessarily the solution to pollution.	1200 mg/l) occur during low flows from June through September. The sources of TDS during these low flows, as per the TMDL, were natural background, irrigation return flows, and two flowing wells that contributed highly saline water to Caineville Wash which flows into the Lower Fremont. There is no runoff occurring during these low flows so there are no contributions from potential upland source areas such as Factory Butte. Also the data show that exceedances have been occurring since 1976 which predates the heavy use of the Factory Butte area for OHVs. BLM has capped the two wells thus fulfilling one of three major water-quality goals in the TMDL. Estimated savings was about 5,000 tons. There are insufficient data to detect a signature from the closing of the wells. The only station that has data that post dates the well closings is “at old U24 Xing” (20 samples). A major-ion analysis may show a difference but assigning that difference to the well closures would not be supportable. The data on selenium in the Fremont River are insufficient for anyone to claim that OHV use causes selenium levels to rise. The DEQ only reports one exceedence of the acute selenium criterion in 68 samples spanning a 34 year period, and DEQ does not list the Lower Fremont as being impaired by selenium. While some Mancos derived soils do contain selenium it is not ubiquitous. The “toxicity” of selenium depends on concentration. Increased erosion normally does occur in areas that are heavily used by OHVs. An increase in erosion does not immediately result in the delivery of the eroded soil particles and solutes to the perennial stream network especially in an arid desert environment. The Lower Fremont is not listed as being impaired by sediment, and at higher flows where upland runoff may be contributing the TDS concentrations are below the criterion. This lower watershed gets heavy loading from the Mancos on both sides of the river above Hanksville. The Bureau of Reclamation report (1986 or 87) estimated an average for the 1977- 80 period as 51,000 tons at the mouth of the Fremont, with about 30,000 tons at the Caineville gage station approximately 35 miles upstream. Division of Water Quality (DWQ) has a new water quality assessment program. Todate DWQ has primarily assessed the condition of the state’s waters with water chemistry data. Recently, a model was completed that provides quantitative scores on the overall biological condition of streams based on the departure of macroinvertebrate assemblage composition from expected reference conditions. Model outputs are used to directly assess biological beneficial use support for many of Utah’s streams and rivers, and this is planned to be incorporated for assessments into the upcoming 2008 Integrated Report (303(d) list & 305(b) report).	
David Smuin	Grand Canyon Trust	Based on information gleaned from the above referenced sources there are several statements and assumptions within the DRMP that are either questionable or erroneous. Specific instances noted include the following: On page 4-25 the statement,... "Compared to other natural and human-caused factors affecting water quality within the planning area, proposed resource management plan decisions would have minor	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a	Water Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		impacts on water quality." This statement does not seem to warranted. What are the other natural and human-caused factors? What does the above statement mean? Also how does one reconcile the sudden jump in selenium values which correspond with the sudden increase in OHV use. Resource management decisions regarding land use are probably the single most important factor concerning the issue of water quality. Simply put, the Mancos Shale is a highly erosive salt bearing formation and management decisions greatly affect the potential of reduced water quality in the Fremont River and Muddy Creek and on downstream to the Colorado River.	TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah's 303(d) list because a TMDL has been developed and approved. Violations of the water-quality criterion for total dissolved solids (TDS = 1200 mg/l) occur during low flows from June through September. The sources of TDS during these low flows, as per the TMDL, were natural background, irrigation return flows, and two flowing wells that contributed highly saline water to Caineville Wash which flows into the Lower Fremont. There is no runoff occurring during these low flows so there are no contributions from potential upland source areas such as Factory Butte. Also the data show that exceedances have been occurring since 1976 which predates the heavy use of the Factory Butte area for OHVs. BLM has capped the two wells thus fulfilling one of three major water-quality goals in the TMDL. Estimated savings was about 5,000 tons. There are insufficient data to detect a signature from the closing of the wells. The only station that has data that post dates the well closings is "at old U24 Xing" (20 samples). A major-ion analysis may show a difference but assigning that difference to the well closures would not be supportable. The data on selenium in the Fremont River are insufficient for anyone to claim that OHV use causes selenium levels to rise. The DEQ only reports one exceedence of the acute selenium criterion in 68 samples spanning a 34 year period, and DEQ does not list the Lower Fremont as being impaired by selenium. While some Mancos derived soils do contain selenium it is not ubiquitous. The "toxicity" of selenium depends on concentration. Increased erosion normally does occur in areas that are heavily used by OHVs. An increase in erosion does not immediately result in the delivery of the eroded soil particles and solutes to the perennial stream network especially in an arid desert environment. The Lower Fremont is not listed as being impaired by sediment, and at higher flows where upland runoff may be contributing the TDS concentrations are below the criterion. This lower watershed gets heavy loading from the Mancos on both sides of the river above Hanksville. The Bureau of Reclamation report (1986 or 87) estimated an average for the 1977- 80 period as 51,000 tons at the mouth of the Fremont, with about 30,000 tons at the Caineville gage station approximately 35 miles upstream. Division of Water Quality (DWQ) has a new water quality assessment program. Todate DWQ has primarily assessed the condition of the state's waters with water chemistry data. Recently, a model was completed that provides quantitative scores on the overall biological condition of streams based on the departure of macroinvertebrate assemblage composition from expected reference conditions. Model outputs are used to directly assess biological beneficial use support for many of Utah's streams and rivers, and this is planned to be incorporated for assessments into the upcoming 2008 Integrated Report (303(d) list & 305(b)	

Commentor	Affiliation	Comment	Comment Summary Response	Category
			report).	
David Smuin	Grand Canyon Trust	Based on information gleaned from the above referenced sources there are several statements and assumptions within the DRMP that are either questionable or erroneous. Specific instances noted include the following: On page 4-25, concerning Methods and Assumptions there is an assumption, "Increased erosion does not necessarily result in increased sedimentation to a perennial stream. " What is the basis of this assumption? Ifthe erosion increases, where does the sediment go if not into the nearest stream? Management decisions need to take the long view and in the long view all of the sediment is either blown somewhere by the wind or carried away by water.	Wind erosion does not deposit all material into perennial streams. Water erosion can also carry sediment to deposition zones which may not be perennial streams. The assumption has been changed in the Proposed RMP/Final EIS to state: "Increased erosion does not necessarily result in increased sedimentation to a perennial stream. For example, wind erosion could carry sediment to deposition zones which may not be perennial streams."	Water Resources
David Smuin	Grand Canyon Trust	Page 4-28 Taken individually starting with the first sentence: "However, increased erosion does not immediately result in the delivery of eroded solid particles and solutes to a perennial stream, especially in an arid environment. " What is the basis ofthis assumption? It is almost certain that any measurable rainfall which exceeds the initial abstraction will start overland flow which will wash the disturbed soils into normally dry gullies which then carry the sediment into perennial streams (namely the Fremont River). What difference does it make whether the eroded soils are immediately transported or are transported in the near future, the sediment still ends up in the surface water? The alluvial fan that is Swingarm City probably does nothing to prevent sediment from reaching the Fremont River, since sooner or later the sediment moves from the head of the alluvial fan to the toe and thence into nearby gullies. Furthermore, the Fremont River is very close to Swingarm City and there are culverts that carry runoff under Highway 24 away from Swingarm City. These culverts then drain directly into an ever increasing backcut that extends from the Fremont River to the highway. There have been numerous instances where sediment from Swingarm City has washed across Highway 24.	The impact analysis on page 4-28 of the Draft RMP/EIS has been revised in the Proposed RMP/Final EIS. The paragraph has been revised to read: "Erosion rates usually increase in areas heavily used by OHVs. However, increased erosion does not immediately result in the delivery of eroded solid particles and solutes to a perennial stream, especially in an arid environment. Swingarm City drains into a broad alluvial fan before reaching the Fremont River. The lower Fremont is not listed as being impaired by sediment or selenium. Water quality standards and criteria adjacent to and downstream of Factory Butte are violated at very low flows when there is no upland runoff. This has persisted for a long period of time, predating the use of OHVs in the area.	Water Resources
David Smuin	Grand Canyon Trust	Page 4-28 The statement, "The compacted soils/bedrock and dispersed drainage minimize the potential for sediment and TDS to enter the Fremont River as a result of OHV activity." seems contradictory to what is known about soil compaction. In fact, most data available indicates that compacted soils do increase the volume of sediments carried by runoff because the runoff coefficient and sediment carrying capacity of the increases substantially. And in fact the proceeding statement, "The analysis is based on the following assumptions: • Substantial surface disturbance to soil, including compaction of soil or loss of vegetative cover, could increase water runoff and downstream sediment loads, thereby degrading water quality, altering channel structure, and affecting overall watershed health.", seems again to contradict the assumption that "compacted soils/bedrock...minimize the potential for	The impact analysis on page 4-28 of the Draft RMP/EIS has been revised in the Proposed RMP/Final EIS. The paragraph has been revised to read: "Erosion rates usually increase in areas heavily used by OHVs. However, increased erosion does not immediately result in the delivery of eroded solid particles and solutes to a perennial stream, especially in an arid environment. Swingarm City drains into a broad alluvial fan before reaching the Fremont River. The lower Fremont is not listed as being impaired by sediment or selenium. Water quality standards and criteria adjacent to and downstream of Factory Butte are violated at very low flows when there is no upland runoff. This has persisted for a long period of time, predating the use of OHVs in the area.	Water Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		sedimentation".		
David Smuin	Grand Canyon Trust	Page 4-28 "The lower Fremont is not listed as being impaired by sediment or selenium. " According to the Utah Division of Water Quality, the Lower Fremont is listed as an impaired system frequently exceeding the MCL for TDS.	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah's 303(d) list because a TMDL has been developed and approved. Violations of the water-quality criterion for total dissolved solids (TDS = 1200 mg/l) occur during low flows from June through September. The sources of TDS during these low flows, as per the TMDL, were natural background, irrigation return flows, and two flowing wells that contributed highly saline water to Caineville Wash which flows into the Lower Fremont. There is no runoff occurring during these low flows so there are no contributions from potential upland source areas such as Factory Butte. Also the data show that exceedances have been occurring since 1976 which predates the heavy use of the Factory Butte area for OHVs.	Water Resources
David Smuin	Grand Canyon Trust	Page 4-28 Next, Water quality standards and criteria adjacent to and downstream of Factory Butte are violated at very low flows when there is no upland runoff. This has persisted for a long period oftime, predating the use ofOHVs in the area." This statement has no relevance regarding the impact disturbed soils have on the Fremont Rivers water quality and does not reflect what the data says about the increasing frequency of selenium violations which parallel the increase in OHV activity. There is little data available to tell us what the water quality of the Fremont River was like before human activities began to change the stability of the soils within the area. The long history of overgrazing and water diversions starting with the first white settlers of the area and proceeding on up to the construction ofHighway 24 and beyond have all had profound effects on the way water and soil interact within these badlands. Upstream flood irrigation practices certainly contribute to the TDS violations occurring during periods of low flow, but the fact that these violations are occurring should have no bearing on how we choose to manage the soil resources of the lower watershed area. All data available to us today tells us that OHVs do indeed disturb soils and increase erosion, and therefore, OHV use on the Mancos Shale badlands can only be expected to contribute to increased levels of sediment and TDS in the waters of the Fremont River.	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah's 303(d) list because a TMDL has been developed and approved. Violations of the water-quality criterion for total dissolved solids (TDS = 1200 mg/l) occur during low flows from June through September. The sources of TDS during these low flows, as per the TMDL, were natural background, irrigation return flows, and two flowing wells that contributed highly saline water to Caineville Wash which flows into the Lower Fremont. There is no runoff occurring during these low flows so there are no contributions from potential upland source areas such as Factory Butte. Also the data show that exceedances have been occurring since 1976 which predates the heavy use of the Factory Butte area for OHVs. BLM has capped the two wells thus fulfilling one of three major water-	Water Resources

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			quality goals in the TMDL. Estimated savings was about 5,000 tons. There are insufficient data to detect a signature from the closing of the wells. The only station that has data that post dates the well closings is “at old U24 Xing” (20 samples). A major-ion analysis may show a difference but assigning that difference to the well closures would not be supportable. The data on selenium in the Fremont River are insufficient for anyone to claim that OHV use causes selenium levels to rise. The DEQ only reports one exceedence of the acute selenium criterion in 68 samples spanning a 34 year period, and DEQ does not list the Lower Fremont as being impaired by selenium. While some Mancos derived soils do contain selenium it is not ubiquitous. The “toxicity” of selenium depends on concentration. Increased erosion normally does occur in areas that are heavily used by OHVs. An increase in erosion does not immediately result in the delivery of the eroded soil particles and solutes to the perennial stream network especially in an arid desert environment. The Lower Fremont is not listed as being impaired by sediment, and at higher flows where upland runoff may be contributing the TDS concentrations are below the criterion. This lower watershed gets heavy loading from the Mancos on both sides of the river above Hanksville. The Bureau of Reclamation report (1986 or 87) estimated an average for the 1977- 80 period as 51,000 tons at the mouth of the Fremont, with about 30,000 tons at the Caineville gage station approximately 35 miles upstream. Division of Water Quality (DWQ) has a new water quality assessment program. Todate DWQ has primarily assessed the condition of the state’s waters with water chemistry data. Recently, a model was completed that provides quantitative scores on the overall biological condition of streams based on the departure of macroinvertebrate assemblage composition from expected reference conditions. Model outputs are used to directly assess biological beneficial use support for many of Utah’s streams and rivers, and this is planned to be incorporated for assessments into the upcoming 2008 Integrated Report (303(d) list & 305(b) report).	
David Sublette davidsublette@aol.com	Pennsylvania Federal Public Lands Chairman, Sierra Club	Map 2-18 portrays a dense web of ORV routes, many less than a mile from the next route. Little has been done to eliminate redundant routes and to keep ORVs away from wildlife habitat and out of areas proposed for wilderness designation.	A variety of data sources were utilized in developing the route inventory. Criteria was set and ID Team meetings were held to analyze individual routes. An appendix was added to the Final RMP EIS that describes the process used for route designations.	Travel Management – OHV Route Identification
Delaina Foster		The BLM is required by federal regulation to minimize conflicts between ORV users and nonmotorized visitors to the area. Trail designations must take this mandate into account. Therefore, BLM must revise its proposed plan in order to provide a fair allocation between motorized and nonmotorized users.	BLM is required to follow EO 11644 and EO 11989 and 43 CFR 8340 in respect to motorized vehicle use in delicate ecosystem. These EOs and regulations guide the management of motorized vehicles.	Recreation
Delaina Foster		The BLM is required by law to maintain the pristine wilderness character of WSAs the agency identified in the early 1980s. However, BLM proposes to designate 45 miles of motorized routes within WSAs. BLM should not designate motorized routes within WSAs; any existing routes	BLM is required by FLPMA to manage the WSAs to prevent unnecessary and undue degradation of the natural landscape. The mechanism to manage these lands is the IMP. A range of alternatives considered a number of options for the inventoried ways in WSAs.	Wilderness Study Areas

Commentor	Affiliation	Comment	Comment Summary Response	Category
		should be closed.		
Denise Johnson		The Alternative B should adopt many of the managed open areas outlined in Alternative A. It is important to me that OHV users have ample access to open travel areas because it would likely keep users from leaving the trails. Please consider adding these to the final decision.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Don Black blackent@xpressweb.com		Special Recreation Permits (SRP) Table 2-16, Page 2-62 As someone who has organized recreational events for OHV's on behalf of Canyon Country 4x4 Club and the Utah 4 Wheel Drive Assoc., I realize a need to have a process where Special Recreation Permits can be issued for these type events. It is the organized OHV groups that are leading the way in educating the public on how to use public lands in a proper and environmentally sound manner along Tread Lightly principles. Making it impossible to hold these organized events by prohibitive SRP requirements is a step in the wrong direction. It does nothing to stop the individuals who are uninformed or disrespectful and cause damage to resources, but does restrict those that would be trying to educate against abuse of public lands. The SRP requirements as shown in Alternate B need to be modified. Group size should be more than 10 vehicles in order for a permit to be required. I would say that 25 vehicles is a more realistic number. Also to 2 hour limit seems to be unreasonable and arbitrary. I ask that appropriate BLM staff meet with representatives of the organized groups including; Utah Four Wheel Drive Assoc. and representatives for the local ATV club if they wish to participate, and a workable policy for Special Recreation Permits developed.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Don Black blackent@xpressweb.com		My wife and I, along with our family enjoy getting out and visiting different places in the area. I am president of the Canyon Country 4x4 club and we enjoy driving the Jeep on the backcountry trails. We also do a lot of hiking, along with camping, photography and other outdoor activities. My experience has been that the claimed conflicts between user groups are much exaggerated. Even close to town, we seldom run across anyone when we are hiking. Unless you are walking on one of the main roads, there are plenty of places you can go and find quiet and solitude. We travel hundreds of miles a year on roads into the back country, and in the vast majority of areas have never seen a hiker or backpacker. I believe that alternate B is the best option, but some changes should be made. In general I support the position and comments by the Utah 4 Wheel Drive Assoc. I understand that with population growth and increased use of ATV's, that cross country travel is no longer acceptable. However, I strongly oppose closing any of the roads in the area that have been on the ground for some time. Utah4 Wheel Drive Assoc. has brought some missing routes to your attention	As specified in the Draft RMP/DEIS (pg. 1-10), addressing RS 2477 assertions is 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.	Travel Management – OHV Area Categories

Commentor	Affiliation	Comment	Comment Summary Response	Category
		and I believe they should be added to Alternate B as routes open to motorized travel. Also, the BLM should recognize the RS2477 claims that are part of Sanpete, Piute, Garfield and WayneCountytransportation plans.		
Don Peay don@sfwsfh.org	Sportsmen for Fish and Wildlife(SFW)	Forage Allocation – A major component is missing in this RMP to discuss the process or allocation of future forage created through rangeland restoration efforts. When major fires, or large scale rangeland efforts are reseeded, the amount of annual forage produced, post treatment, can be significantly increased. There is no mention in this RMP as to how this forage is re-allocated, or WHAT PERCENT GOES TO LIVESTOCK AND WHAT PERCENT GOES TO WILDLIFE.	Increases or decreases in AUMs are allocated to livestock or wildlife depending on the allotment objectives contained in the RMP and Rangeland Program Summary. The actual distribution of forage will be determined on a case-by-case basis.	Livestock Grazing
Don Riggle	Colorado 500	Therefore we will site and several IBLA decisions to remind the BLM that it has no authority to create a Wilderness, covertly or overtly, on any lands in the RFO jurisdiction: “The Interior Board of Land Appeals (IBLA) has initiated in numerous decisions regarding the BLM’s authority to establish new wilderness study areas. The following paragraphs are quotes from IBLA decisions. “The Bureau of Land Management's (BLM) authority to conduct wilderness reviews or establish a new wilderness study areas expired on October 21, 1993, and absent Congressional authorization, BLM may not established, manage or treat public lands, other than those designated wilderness by Congress under 43 U.S.C. Sec 1782 (2000), as wilderness study areas or as wilderness under the land use planning provisions of the Federal Land Policy and Management Act of 1976 (FLPMA), 43 U.S.C. Sec. 1712 (2000). “Even where the land has been proposed for wilderness designation in pending legislation, BLM may properly administer those lands for other purposes, where the land has not been included in the wilderness study area. Because that time for taking appeals from inventoried decisions has long since passed, the doctrine of administrative finality precludes appellants from challenging those decisions by filing protests against actions taken by BLM to administer the land for other purposes. (IBLA 2002-307, August 17, 2004.) “Once the decision has been made to reject land for inclusion in the wilderness preservation system, NEPA does not require subsequent analysis of the impacts of that determination, because such impacts were considered when the decision was made to administer them for other purposes. “Colorado Environmental Coalition,” 161 IBLA at 396; “Southern Utah Wilderness Alliance,” 158 IBLA 212, 214-15 (2003); “Southern Utah Wilderness Alliance,” 151 IBLA 338, 341-42 (2000); “Colorado Environmental Coalition,” 149 IBLA at 156; “Southern Utah Wilderness Alliance,” 150 IBLA 263, 266-67 (1999); “Colorado Environmental Coalition,” 142 IBLA 49, 52 (1997); “Southern Utah Wilderness,” 128 IBLA 52, 65-66 (1993).”	BLM’s authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM’s organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary’s authority to manage lands as necessary to “achieve integrated consideration of physical, biological, economic, and other sciences.” FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . .” FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs. Finally, the Utah v. Norton Settlement Agreement does not affect BLM’s authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA § 603 and required to be managed under § 603's non-impairment standard, and other lands that fall within the discretionary FLMPA § 202 land management process. See also IM 2003-275.	Non-WSA Lands with Wilderness Characteristics
Don Riggle	Colorado	Make a slight change to the language describing the recreation and	The Final RMP/EIS has been revised to reflect changes in BLM policies requiring	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
	500	travel management proposals (beginning on 2-44) to manage ERMAs and their encompassed SRMAs. Change the management guidance for Alternative B to read as follows: "Manage the ERMAs and the encompassed and adjacent SRMAs to provide a variety of recreational opportunities including primitive, semi-primitive non-motorized, semiprimitive motorized, roaded natural, and rural. Provide outdoor settings ranging from areas with a high-to-moderate opportunity for solitude and closeness to nature, where visitors should be prepared for a high level of self reliance, challenge, and risk; to areas where visitors have the convenience of facilities and a higher interaction with other users." Every visitor to this type of recreation setting wants this experience, whether non-motorized or motorized." Please use this language to replace the present narrative describing the management guidance for the Dirty Devil/Robber's Roost, and Henry Mountains SRMAs, and for the ERMAs that are adjacent to and surrounding these SRMAs.	additional detail for SRMAs.	
Don Riggle	Colorado 500	Please refer to the DRMP page 4–162 "Proposed decisions to designate existing routes open to vehicle use, particularly routes in riparian is, could adversely impact migratory birds do to have a tad degradation and fragmentation from the routes and director mortality from vehicle use." Conversely, proposed decisions to close routes would benefit birds and habitat by reducing that the degradation, fragmentation, and direct mortality." There is no data supplied in the analysis to support these statements. Please remove them. Direct mortality from vehicles traveling at a rate of five to 25 MPH is undocumented. Habitat degradation due to the simple presence of trail–based OHV recreation is not documented anywhere in this analysis. Under the preferred alternative, this analysis reveals no potential for habitat degradation from the sample presence of OHV.	The BLMs anaysis of fish and wildlife impacts is addressed in the Draft RMP EIS 4.3.9 Methods and Assumptions.	Travel Management – OHV Route Identification
Don Riggle	Colorado 500	Please remove the entire section called "Impacts from Travel Management" beginning on page 4–161 through paragraph 3 on page 4-162. The reason we wanted these statements removed is because this analysis has supplied no field data to substantiate these statements; this analysis cites no peer-reviewed literature to support the claim that the simple presence of trail based motor recreation causes any of those affects. The reason we want this removed is because these statements do not measure up to even the most minimal standards of professional opinion.	The BLMs anaysis of fish and wildlife impacts is addressed in the Draft RMP EIS 4.3.9 Methods and Assumptions.	Travel Management – OHV Route Identification
Don Riggle	Colorado 500	On page 2-51, we want RFO to delete the proposal to "close all canyons" to OHV use. Trails in these locations must be evaluated according to accepted professional standards for site-specific travel management decisions – including the accurate use of current research.	Alternatives to designate BLM public lands as open, limited or closed to OHV use is consistent with 43 CFR 8340. This section is consistent with the BLM Land Use Planning Handbook for the identification and management of Special Recreation Management Areas.	Travel Management – OHV Route Identification
Don Riggle	Colorado	We want the RFO to conduct a recreational route inventory according to	This inventory methodology included in the BLM Technical #9113-1 is a tool that	Travel

Commentor	Affiliation	Comment	Comment Summary Response	Category
	500	BLM Technical Reference #9113-1, in order that every trail is included in the database for the route designation process.	may be used to help with land use plan development. This technical reference was issued after the route inventory had been conducted and therefore was not required.	Management – OHV Route Identification
Don Riggle	Colorado 500	We want RFO staff to use the enclosed citations in the Final RMP, in order to provide a rational connection between decisions and the data provided in the DRMP. This, and much, much other research shows that trail based motor recreation on designated routes, as the DRMP proposes in Alternative B, has the same effects as every other recreational activity.	The BLM has considered the citations enclosed. The BLM stands by the analysis within the Draft RMP EIS.	Travel Management – OHV Route Identification
Don Riggle	Colorado 500	We want you to review the entire document, for the express purpose of removing any and all unsupported statements about trail-based OHV recreation.	The BLM has considered this comment and stands by the analysis within the Draft RMP EIS.	Travel Management – OHV Route Identification
Don Riggle	Colorado 500	We seek a connection between the data presented and the proposal to close, or continue to keep closed to vehicles, any WSA. The IMP does not instruct any Field Office to close the inventoried routes in WSAs. As these areas are not yet designated by Congress, preventing motorized access in and around any WSA, along with creating it SRMA's that emphasize "non-motorized" recreation adjacent two and surrounding the WSAs, will be construed as "manufacturing Wilderness," In which the ID Team uses and the RMP process to designate the areas in and around WSAs (using the administrative, the social, and the physical settings) and maker of vehicle access difficult.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. Closing inventoried ways is not a defacto wilderness designation, it is a RMP decision. The non-impairment criteria identified in the IMP provides direction to BLM to monitor and if necessary close inventoried ways should use show a substantial impact to the wilderness character of the WSA.	Wilderness Study Areas
Don Riggle	Colorado 500	We want the RFO to remove from Page 2-52 the proposal to close, and to continue to keep closed, any WSA or portions of WSAs to OHV use on designated routes.	FLPMA allows for continued OHV use on inventoried ways in WSAs during the WSA phase. The IMP specifies that there be no unnecessary and undue degradation to the WSAs.	Wilderness Study Areas
Donimic Simpson	Utah 4 Wheel Drive Association	I believe the BLM should seek out alternate methods to manage and protect the land, without giving it a WC designation. The currently proposed WC lands Alternatives C & D are overboard. Some of these areas have historically used machine built roads. Some of these areas have historic ranching and mining impacts.	BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. A	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	
Donimic Simpson	Utah 4 Wheel Drive Association	The third modification concerns SRP. I don't believe that group size should be limited to 10 vehicles under the proposed criteria for special recreation permits. This number in my opinion is unrealistic and makes group events such as family picnics or scouting events impossible. In addition, I don't believe the rules and authorized exceptions for these SRP's should be clarified and added to Alternative B.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Donimic Simpson	Utah 4 Wheel Drive Association	I would like to see the following routes open: Sams Mesa Routes, Happy Canyon Routes, Spur Route , Connector road east of Bicknell, Muddy Creek Route, Spur route, Wood Bench spur route, North Pinto Hills Route, Angel Cove route, Connector Routes, Miners Park Spur routes and connector route @T27S R3W.	Data available for routes on Sam's Mesa was analyzed and designated as open or open to 50" or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed within Happy Canyon for consistency with other resource decisions of the RMP. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the preferred alternative. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns. T.27 S., R.8 E., spur route Comment lacked specificity to identify Wood Bench Spur Route. Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) were reassessed. WYNC0017 and 0018 were designated for Administrative Use Only due to resource concerns. Insufficient data was available on route #WYNC0017A. If there is a purpose and need for this route in the future, inventory data would need to be gathered and analyzed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the preferred alternative (PTSR0201).	Travel Management – OHV Route Identification
Dorde Woodruff jodw@earthlink.net		A Minor Correction In Table 3-15 Sclerocactus is misspelled	The spelling has been corrected in the PRMP/FEIS Table 3-15.	Other
Dorde Woodruff jodw@earthlink.net		Reasonable access to both open areas and a trail system is essential for successful enforcement. Successful enforcement must be done.	Setting of fines and enforcement of RMP decisions are both outside the scope of this NEPA document. Fines are set by the Chief Magistrate Judge for Utah. Enforcement is addressed at the implementation level and determined by funding and resource need.	Recreation
Dorde Woodruff jodw@earthlink.		As a disabled person who can no longer hike far, I'm interested in trails for motor vehicles. Cherry-stemming is a useful way for disabled	An range of route designations has been proposed in the Draft RMP/EIS, which includes several cherry-stemmed routes. The decisionmaker will consider this	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
net		persons to access lands more fully. I would hope that you will indeed work well with users in developing more routes that can be successfully opened in appropriate places.	range of alterantives in developing the Proposed RMP and ROD.	
Dorde Woodruff jodw@earthlink.net		Buckhorn cholla On page 3-10: "Desert shrub includes the salt shrubs: shadscale, greasewood, blackbrush, and desert grassland vegetation cover types (see Table 3-6)." Table 3-6, Typical Desert Shrub Plant Species, includes under Forbs Buckhorn cholla, Opuntia acanthocarpa. I don't find O. acanthocarpa in any of the Gap Analysis cover types, see http://gapanalysis.usgs.gov/portal/server.pt/gateway/PTARGS_0_2_1105_209_242_43/http%3B/gapcontent1%3B7087/publishedcontent/publish/public_sections/gap_home_sections/handbook/handbook_land_cover_assessment/utah_veg__atlas/utah_veg_atlas.html O. acanthocarpa is not appropriate for your area. In Utah it grows only in the extreme southwest.	Buckhorn cholla occurs in Washington County, outside the RMP planning area. This species has been removed from the table in the PRMP/FEIS.	Vegetation
Dorde Woodruff jodw@earthlink.net		As shown by both many published studies and unpublished data, Sclerocactus is impacted by all the activities of man. As use of desert lands increases, continued studies and care in management are most essential. We don't know what the impact of global warming will be. The genus as a whole was badly impacted by the drought of 2002. I'm less familiar with the Pediocacti; their situation is similar.	A Biological Assessment was written concerning these two cacti. Conservation measures were identified that would mitigate issues. As far as global warming is concerned, it may or may not be and this assertion is out of the scope of this RMP.	Vegetation
Doug Bjerregaard		My property borders BLM land west of Mayfield. This small range of mountains provides critical winter habitat for deer and elk and spring habitat for nesting mourning doves. OHV use in the past years has severely damaged this area. OHV traffic in this area on steep slopes and friable shale soil has accelerated erosion and greatly increase flood waters from this sensitive area. This area should not have uncontrolled OHV use.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Douglas Christensen dfredc@msn.com	Utah State OHV Advisory, Southern, Utah OHV Club, Pauite Trail Committee	With the exception of Alter A that we are closing the Roads mark SESRo31, SESRo248, SESRo247a. It looks like you are just closing the roads period. We ride those roads in the winter looking at wildlife.	SESR0231 was reviewed, the route has been re-routed and this route abandoned. It has been identified for closure and consolidation of routes. SESR0247A and SESR0248 were reviewed. They only occur for a short distance on BLM lands and are not identified for travel on the adjacent FS lands. They are identified as closed for consistency with FS management.	Travel Management – OHV Route Identification
Douglas Christensen dfredc@msn.com	Utah State OHV Advisory, Southern, Utah OHV Club, Pauite Trail	The Rmp describes thousands of acrres of closed areas, but the maps provided to teh public did not show these areas and their respective boundaries.. You cant comment on the closed areas without being provided maps showing the closed areas, The maps did not effectively differentiate between limited width trails and standard width trails, how can the public effectively comment on the routes if they are not shown as limited width vs standard width.	BLM has provided detailed maps within the document. Maps of finer detail can be accessed at the RFO reading room. Maps were created to differentiate the designation of the route, not the route classification.	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Committee			
Douglas Christensen dfredc@msn.com	Utah State OHV Advirsory, Southern, Utah OHV Club, Pauite Trail Committee	Designated Paiute Side Trail 74 along the Railroad Grade to PTSR0411A and PTSR0412 is not shown on the maps, It should be shown and remain open PTSR0345 shows a closed section in the middle of the route, this should remain open	Paiute Trail 74 was inadvertently left off of maps and has been corrected (PTSR0411). PTSR0345 was a mapping error and has been corrected.	Travel Management – OHV Route Identification
Douglas Hunter doug@uamps.com		I would suggest, based upon received comments, that you afford another round of review that would allow a sit down session of all interested parties to discuss the proposed RMP during February to May period. I believe that this would go a long way in reducing the validity of subsequent challenges.	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held six open houses around the State to facilitate review of the Richfield DRMP/DEIS.	Process and Procedures
Dwayne Rowland Dwayne@Exody.com		The Great Western Trail is a good example of such a trail which runs thru the Richfield BLM area. I did not see any reference to this very important trail in any of your plan documents.	This trail is discussed in 3.4.4.1 page 3-71, and is shown on page 2-75 Common to All Alternatives: Travel Management Decisions, and is on all Travel Management maps.	Travel Management – OHV Route Identification
Eddie Evel edevel@juno.com		The "Americans With Disabilities Act" guarantees equal access for all Americans, and unfair and un-needed restrictions on motorized vehicles infringes on that right.	The ADA accessibility guidelines do not specify or quantify the type or degree of access that must be allowed on public lands. The ADA does not require that all public lands be vehicle accessible. In addition, designated recreational motorized routes are an administrative decision and not subject to ADA. However, the ADA accessibility guidelines will be use in construction of any Federal facilities on public lands.	Transportation
Eddie Evel edevel@juno.com		FLPMA (and other laws) provide that management of public lands should be based on multiple use and sustained yield. This includes motorized recreation. The BLM should be working to make more motorized recreation areas available, instead of less.	The BLM considered a range of alternatives that closed between less than 2% of miles of motorized routes in Alternative N to 28% in Alternative D. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of motorized access and recreation.	Transportation
epolelon@sixaog.state.ut.us	Six County Association of Governments	Section 4.3.5.1 Native American Religious Concerns- tribal consultation is crucial, but the final analysis should be reasonable and not one-sided.	Regardless of whether a Federally-recognized tribe enters into a cooperating agency relationship, its fundamental connection to the BLM is based on tribal sovereignty, manifested through the government-to- government relationship. However, BLM is mandated by Congress to comply with FLPMA and the multiple-use requirements in addition to the laws listed in section 5.4.1 of the Draft RMP/EIS. BLM makes the final land use planning decisions based on a balance of input from Tribes, cooperating agencies, stakeholders, public comments, and the limitations imposed by Federal law.	Consultation and Coordination

Commentor	Affiliation	Comment	Comment Summary Response	Category
epolelon@sixaog.state.ut.us	Six County Association of Governments	Page 3-26 The TCP's (Traditional Cultural Property) is a concept that brings insight as to how a tribe can claim rights to a piece of ground by merely occupying it. According to Stoffle's research the Big Roundup of Navajo's by Kit Carson the Dine claimed part of the Henry Mts. As a TCP, is it possible to see this study? What actually constitutes a claim, i.e. is it the length of stay in an area or when prayer altars are constructed or some other event/activity?	Traditional Cultural Properties do not convey rights to Native American Tribes. Traditional Cultural Properties identify areas sacred to Native American Tribes. If a Traditional Cultural Property is designated, the site is afforded the protection granted under the National Register of Historic Places. Stoffle's research is not tied to the Navajo. The research is linked to an area sacred to the Southern Piute and is unrelated to the Long Walk of the Navajo.	Consultation and Coordination
epolelon@sixaog.state.ut.us	Six County Association of Governments	Page4-55 This section is not numbered correctly, i.e. the TOC is different from the pages.	The Table of Contents numbering has been corrected in the PRMP/FEIS.	Other
Erik Larsen elarsen@naexp.com		the BLM has failed to adequately consider reasonable access to federal and private minerals and to consider the effects its proposed management strategy will have on current and future oil and gas exploration and development activities, and on the rural economy. A recent study by the University of Utah\'s Bureau of Economic and Business Research found that the average wage for oil and gas exploration and production jobs in Uintah County is $84,795, more than double the county average wage of $39,056.	The Draft RMP/EIS discloses areas that are available to be leased, there are reasons why certain parcels of land are not available to be leased such as cultural resources, WSAs, ACECs, and habitat for threatened and endangered plant and animal species. Acres unavailable for oil and gas leasing can not be directly correlated to loss of income or economic benefits.	Minerals and Energy
Erik Larsen elarsen@naexp.com		There is no justification and no mandate in the Federal Land Policy and Management Act (FLPMA) and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the 603 Process was completed, the agency was done with its Wilderness review. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so would obviate the FLPMA mandate, USC §1702 (c) (Section 103(c)), of multiple use and result in a loss of economic development in the local community and a denial of energy resources for the state and nation.	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
Erik Larsen elarsen@naexp.com		Large portions of the Covenant Field, the portion of the planning area with the highest potential for oil and gas, would be designated as Class II. This restriction on the Covenant Field should be removed to ensure this vital energy resource is accessible to Utah and the nation.	BLM currently manages some of the Covenant Field as VRM Class II. The Richfield Field Office has developed and implemented best mangement practices (BMPs) for visual impacts associated with oil and gas development.	Visual Resources
Ernest Johnson ernest_johnson@xtoenergy.com		These substantial winter drilling restrictions will shut out operators for six months, leaving a very limited time for oil and gas activity. Land managers should have the flexibility to approve projects that propose innovative ways to mitigate the impacts on wildlife in exchange for year-round drilling, such as directional drilling projects.	The Draft RMP/EIS includes exceptions for timing limitations on oil and gas leasing (appendix 11). The Final RMP/EIS has been revised to include the following exception for the crucial and high value mule deer and elk habitat timing limitation. "Consider exception if deer and/or elk are not present or if the lessee/operator can demonstrate that adverse impacts can be mitigated."	Minerals and Energy - Oil and Gas
Ernest Johnson ernest_johnson@xtoenergy.com		There is no justification and no mandate in the Federal Land Policy and Management Act (FLPMA) and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the \"603 Process\" was completed, the agency was done with its Wilderness review. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so would obviate the FLPMA mandate, USC Â§1702 (c) (\"Section 103(c)\"), of multiple use and result in a loss of economic development in the local community and a denial of energy resources for the state and nation.	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	Non-WSA Lands with Wilderness Characteristics
Ernest Johnson ernest_johnson@xtoenergy.com		In the Preferred Alternative, 209,000 acres would be designated as VRM Class II, which severely restricts the surface disturbance from oil and gas activities and renders in-fill development virtually impossible. Large portions of the Covenant Field, the portion of the planning area with the highest potential for oil and gas, would be designated as Class II. This restriction on the Covenant Field should be removed to ensure this vital energy resource is accessible to Utah and the nation.	BLM currently manages some of the Covenant Field as VRM Class II. The Richfield Field Office has developed and implemented best maangement practices (BMPs) for visual impacts associated with oil and gas development.	Visual Resources
Evan Day		Unfortunately, at the end of that same paragraph, you stated "By definition. all vertebrate fossils are considered rare by BLM and impacts to these types of fossils are of greatest concern." (my emphasis) The marvelous fish fossils (certainly vertebrate) of the Green River	BLM is required by law and BLM policy to protect vertebrate fossils.	Paleontological Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Formation in Wyoming near Kemmerer are quarried in hundreds of tons each year on private and Wyoming State leased lands. Hardly rare! I also noted that Table 3-13 (Vol I, p. 3-26) "Geological Formations Present in the Planning Area" includes that same Green River Formation in the western portion of the RFO. I urge in the Final RMP you will keep that region available for myself and members of "Utah Friends of Paleontology" to explore.		
Evan Day		RECREATIONAL ROCKHOUNDING: As noted in the DRMP/OEIS the following paragraph: "3.4.6.3.5 OTHER MINERALS: Other mineral materials considered in Mineral Potential Report include oyster shell, petrified wood, jasper, agate, and chalcedony. Oyster shellfrom the Dakota Formation has been used for road surfacing in Wayne County. There is also interest in oyster shell for agricultural use. It is considered unlikely that the other mineral materials considered will have development beyond hobby or casual use within the next 15 years, " (my emphasis) Thus, hobby collecting of minerals by "Rockhounds" is recognized as a legitimate pursuit. My wife and I are in our 70's, and she in particular is unable to walk more than a very short distance from our truck to collect agate, petrified wood, onyx, minerals, etc to make into jewelry in our "Rockhounding" hobby. Surely, as suggested for camping and parking in your alternatives, occasional travel off of designated routes to specific sites or deposits of collectable materials can be accommodated, perhaps one-quarter mile for a half day of collecting by individuals or organized Gem and Mineral Societies?	All the alternatives allow for casual use associated with rockhounding. However, to provide the protection of resources and reduce the proliferation of routes, OHV categories would apply to all casual use activities.	Recreation
Evan Day		However, Alt C and 0 Off-Highway "Closed" designations for the Clay point region on Map 2-15 and 216 and closed route designations shown on the CO Maps for "Notom Road" and "Hite" are unacceptably restrictive. See: • (T34S: RIOE, RIIE, R12E) • (T35S: R9E, RIOE, RIIE, R12E) • (T36S: R9E, RIOE, RIIE, RI2E)	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Route Identification
Evan Day		Map for "Fremont Junction" are also acceptable in the RFO portion, but we need to be assured of continuation into the Price Field Office routes for the Mussentuchit region, see: Richfield FO: T24S - R5E and T25S - R5E Price FO: T24S - R6E and T25S - R6E	There was coordination between the two Field Offices, however, this plan does not make route designations for the Price Field Office.	Travel Management – OHV Route Identification
Evan Day eday@sisna.com		I asked that access provisions be made for hobby mineral collecting Rockhounding. I asked that we be allowed to travel to specific sites at least onequarter mile off of designated routes	All the alternatives allow for casual use associated with rockhounding. However, to provide the protection of resources and reduce the proliferation of routes, OHV categories would apply to all casual use activities.	Transportation
Evan Day eday@sisna.com		Any NEW finds of collectable minerals or invertebrate fossils could be also served by new designated routes to specific sites as negotiated with other users in a multiple use approach similar to that to be applied to mining prospecting.	All the alternatives allow for casual use associated with rockhounding. However, to provide the protection of resources and reduce the proliferation of routes, OHV categories would apply to all casual use activities.	Transportation
firecro@mstarmetro.net		We oppose the sale of two parcels of land, tracts 19 and 20, listed in table A5-4. These two tracts total approximately 180 acres. Our opposition includes: We understand a federally listed threatened plant	Conservation strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		species, Last Chance Townsendia (Townsendia aprica) has been identified on Tract 19. Certainly this tract should be kept in public ownership and measures undertaken to protect these plants. Regarding tract 20 - This property includes Carcass Creek which is an important source of water for local residents and wildlife. The stream area provides forage and protection for elk, deer and many turkeys. This is a natural corridor for the animals to reach national forest lands. Removing this tract from public ownership will surely have an adverse impact on the wildlife population and hunting opportunities.	Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	
Fred and Bessann Swanson		Also, on page 4-11 it is assumed that applying rangeland health standards would reduce impacts on soils. This may be true for soils that are already in decent condition, but vast areas in the eastern part of the district contain severely disturbed soil and vegetation communities, where "maintenance and improvement of organic matter content, soil structure, permeability and productivity" is almost laughable.	In 1934 the Taylor Grazing Act was enacted to stop the degradation of grazing land. Since 1934 substantial changes have been made to improve the rangeland. Currently, rangelands are evaluated for rangeland health which takes into account riparian habitat, native plant species and diversity, upland soils and clean water. If it is determined that livestock are causing the problem the BLM implements actions ot mitigate the impact and eliminate the problem.	Livestock Grazing
Fred and Bessann Swanson		We believe that you will need to substantially increase enforcement efforts to make a difference. Since budgets for this are likely not available, the EIS should state that a certain percentage of vehicles (ten percent? twenty?) will not follow the restrictions, resulting in continued soil and vegetation damage.	The Draft RMP/EIS does not include a detailed analysis of illegal activities. Enforcing the RMP decisions is an implementation-level action. Concerning the impacts from OHV leaving routes that are identified in an alternative, the Draft RMP/EIS analyzes the effects of the proposed actions, which does not include public land users driving off identified routes in areas that where OHV use is limited to identified routes.	Scope of Document
Fred and Bessann Swanson		This part of the district needs serious rehabilitation efforts, including a gradual phase-out of livestock grazing and an absolute ban on cross-country vehicle travel.	An alternative that proposes to make the entire RFO unavailable for grazing would not meet the purpose and need of this DRMP/DEIS. An alternative that proposes to make the entire planning area unavailable for grazing would also be inconsistent with the intent of the Taylor Grazing Act (TGA) which directs the BLM to provide for livestock use of BLM lands, to adequately safeguard grazing privileges, to provide for the orderly use, improvement, and development of the range, and to stabilize the livestock industry dependent upon the public range. Not allowing cross-country OHV use was considered in the range of alternatives in the Draft RMP/EIS. Alternatives C and D of the Draft RMP/EIS considered prohibiting cross-country OHV use throughout the decision area.	Scope of Document
Fred and Bessann Swanson		The EIS should analyze the need for each individual route, such as giving access to a stock tank or a trailhead, or to give motorized access to a significant scenic point not within a roadless area. If no clear need exists, the route should be securely closed.	Routes are evaluated on a case-by case basis, depending on varying resource values.	Travel Management – OHV Route Identification
Fred and Bessann Swanson		We believe that the road along The Big Ridge, and the tracks north and south of Burr Point, do not serve a sufficient need for public motorized travel, and should be closed to OHV use. Grazing allotments in these areas should be assessed for vegetation damage and restrictions	Routes on the Big Ridge were analyzed and designated as open. Numerous routes north and south of Burr Point were analyzed and designated in accordance with route designation criteria and consistency with other resource decisions of the RMP.	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
		applied to allow vegetative recovery.		
Fred and Bessann Swanson		Much of the landscape east of the Cathedral Valley section of Capitol Reef National Park has very high scenic and wilderness values and should be placed off-limits to cross-country vehicle travel. The main roads to and from the park are suitable for vehicle use, but most of the side roads and tracks that do not serve an identifiable purpose should be closed.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Route Identification
Fred and Bessann Swanson		While the access road to the South Fork of Ticaboo Canyon serves a recreational need and gives access to a watering tank, the continuation of this route onto Ticaboo Mesa does not appear to serve much real purpose, and should be closed.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Route Identification
Fred Goodsell suwa@suwa.org	SUWA	Please do NOT put ATV play areas in the two areas proposed near Richfield. These areas contain most of the worlds populations of two rare plants which you consider sensative. Utah Phacelia and Arapien Stick Leaf need your protection and should not be in a "Play Area".	Changes have been made in the OHV designations for the two areas in which these two species are found. OHV use in the White Hills area is now restrictred to designated roads and trails and OHV use has also been restricted to designated roads and trails in much of the Rainbow Hills area. These designations will help protect and manage the Utah phacelia and Arapien stick leaf.	Special Status Species
Gail Fox kotatbay@earthlink.net		I would like to express my support for Alternative D in the Richfield Draft Resource Management Plan that would raise the Canyonland Herd Management Areas wild burro population to a range of 120-200 wild burros. Certainly there is enough land and food for 120-200 wild burros. However, I would like the BLM to make the following modifications to ensure the permanent preservation of the Canyonland burros, their HMA and the critical habitat requirements they need to survive. No acreage or water sources should be eliminated, transferred or sold from the historical Herd Areas or Herd Management Areas. All natural water sources currently being used by the Canyonland burros must be permanently protected and guaranteed and if necessary to preserve viable herds, water developments must be allowed to be constructed and maintained within the Herd Management Area. No wild horse/burro range or critical habitat requirements should be transferred to agencies that refuse to protect wild horses and burros (such as the National Park Service, who does not "manage them" and considers shooting them as a humane population control method). The BLM has acknowledged that the Canyonland wild burros are a rare type of burro in the wild and clear and detailed preservation plans must be provided for them, including proper forage and water allocations to support the proposed population range of 120-200 wild burros, even if it requires reductions in livestock grazing to support viable herds. Do not allow big game species, whose numbers far outweigh the remaining burros on public lands, to be managed as a priority within the Herd Management Area.	There are adequate vegetation resources to increase the herd size to 120-200, however, water sources are very limited. There is not enough water to support this range of herd size year round. There are no actions in the RMP that would elimate or transfer acreage or water within the HMA. There are no actions in the RMP that would transfer mangement of the wild horses and burros to other agencies. Livestock grazing on 30% of the Canyonlands HMA has been relinquished to the Canyonland Trust, with no plans for livestock grazing to occur in these areas. A detailed plan for the Canyonlands burros is outlined in the AML (Appropriate Management Level). There are no plans to give prioirty to wildlife over burros within the HMA; UDWR manages wildlife populations, BLM's authority is to manage burro populations.	Wild Horses and Burros
Gary Cukjati aaron_bannon@nols.edu	National Outdoor Leadership	In addition to the land proposed for the SRMA in Alternative C, Buck and Pasture Canyons should be included in their entirety within the boundary, including a half-mile buffer zone along the rims. It is	The recommended boundaries are contained within the Alternative D SRMA boundaries and are therefore within the range of alterantives for the decisionmaker to consider in developing the Proposed RMP and ROD. The Draft	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
	School	disconcerting that the Northern ends of these two canyons have been cut from the SRMA due to the presence of an unimproved road. NOLS and OIA are not opposed to the continued existence of this road, but would not like to see any significant increased usage, and do not think it should act as a boundary to the SRMA. NOLS semester courses travel in and around these canyons, which provide technical canyoneering and exploration challenges with numerous top-out and drop-in points. They are demanding yet manageable navigationally, and their inclusion in the final RMP would provide long-term protection of the existing recreational values. Buck and Pasture canyons are essential in running a progressive month-long course in the canyon system, and are well situated near the important access point of Robbers Roost Spring.	RMP/EIS provides a reasonable range of alternatives. Each alternative of the Draft RMP/EIS represents an alternate means of satisfying the identified purpose and need and of resolving issues raised during the public scoping period. The range of alternatives began early in the RMP planning process starting with the public scoping period and was further developed throughout the planning process in coordination with our cooperating agencies and during the public comment period. The Draft RMP/EIS management alternatives for VRM classifications, right-of-way exclusion areas, oil and gas leasing stipulations, identified OHV routes, Wild and Scenic Rivers, ACECs, non-WSA lands with wilderness characteristics, and WSAs near these areas include restrictions on surface disturbing activities and resource uses address the issues raised.	
Gary Cukjati aaron_bannon @nols.edu	National Outdoor Leadership School	Buck Pasture, White Roost and Larry canyons, all cut off from the SRMA, are important hiking areas. These natural canyon ends should also be classified as closed to leasing. Along the eastern bank of the Dirty Devil River, from Happy Canyon to the north, canyon rims and viewsheds of all side canyons should be either closed to leasing or subject to NSO constraints. NOLS students hike the entirety of the western rim of Buck Canyon, an area that is currently given a Category 2 designation (subject to minor constraints) in the preferred alternative. A more stringent category should be applied. Also, the land between Buck and Pasture, and between Pasture and White Roost canyons, should either be Category 3 (subject to major constraints) or Category 4 (closed to leasing). These areas are essential to backcountry adventurers seeking out the possibilities within these canyons. These benches, which connect the most popular canyons off the Dirty Devil, should retain a natural appearance. Further south, NOLS courses typically follow the Dirty Devil closely between Happy Canyon and Sams Mesa Box Canyon, but courses are increasingly finding challenging exits near Sam's Mesa Spring and dropping South into Happy Canyon. The presence of a large category 2 island immediately buffered by Category 4 lands to the north and Category 3 lands to the south (within the preferred alternative) disrupts the continuity of leasing constraints, right in the heart of the SRMA.	The recommended management is contained within the range of alterantives for the decisionmaker to consider in developing the Proposed RMP and ROD.	Recreation
Gary Cukjati aaron_bannon @nols.edu	National Outdoor Leadership School	Limiting surface disturbance on canyon rims within view of canyons and of remaining VRM Class II zones, as in both alternatives B and C, should be preserved to ensure a viable SRMA. When one considers that commercial group size limitation in every alternative is enforced within a half-mile of canyon rims and within the canyons, presumably to preserve a primitive experience for all users, it seems logical that similar restraints could be imposed on leasing categories. To that end, NOLS and OIA recommend that oil and gas leasing have an NSO stipulation within a half-mile of canyon rims, and if the viewshed requires a wider berth it	The proposed Dirty Devil SRMA management prescriptions would lease with NSO VRM Class II areas and canyon rims within viewshed of canyons (approximately one-quarter mile) to protect scenic values and opportunities for primitive and semi-primitive recreation. Additionally, portions that fall within WSAs would be closed to leasing.	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		should be accommodated. Areas within a quarter-mile of canyon rims should be closed to leasing.		
Gary Cukjati aaron_bannon @nols.edu	National Outdoor Leadership School	As it applies to the Dirty Devil SRMA. At a minimum, NOLS requests that the final plan be modified to read, "Within one-half mile of canyon rims and below the rim, limit group size to 15 or fewer, and travel in groups of eight or fewer. Allow no commercial or organized group larger than 15 to operate in this area." Additionally, NOLS would recommend the following bullet be added: "When developing an activity plan for the SRMA, implement a impact monitoring program to better estimate the long-term effects of management decisions intended to preserve the long-term viability of the resource."	The one-half mile stipulation applies to the issuance of SRPs prior to completion of the SRMA activity plan. These stipulations are consistent with SRP stipulations for current SRPs and were developed based on recommendations within the Mexican spotted owl recovery plan to reduce recreation related impacts to the species. Surface disturbing activities from other resources would be addressed through site specific NEPA for those proposals. A monitoring program is a component of an SRMA management plan.	Recreation
Gary Cukjati aaron_bannon @nols.edu	National Outdoor Leadership School	More specifically, the unimproved road between Pasture and White Roost Canyons, the unimproved road straddling the Dirty Devil river near Angel Cove, the unimproved road south of Larry Canyon, the unimproved road bordering the Dirty Devil to the east in Sams Mesa, and the unimproved road in Happy Canyon should all be closed. It is satisfactory for the road forming the Northern SRMA boundary to remain open, but it should not be further developed. Likewise, the road access to Sam's Mesa should not be further developed.	Numerous routes were analyzed in the vicinity of Pasture, White Canyon, Larry Canyon and Sam's Mesa. Some routes in these areas were designated to allow access. Other routes were closed to consolidate routes or to meet resource decisions of the RMP. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for Angel Cove and the Dirty Devil River. The non-motorized section has been removed from the motorized route designation map. Happy Canyon routes were analyzed and closed for consistency with other resource decisions of the RMP and coordination with Glen Canyon NRA.	Travel Management – OHV Route Identification
Gary Cukjati aaron_bannon @nols.edu	National Outdoor Leadership School	If the benchlands between canyons are significantly impacted, the undisturbed setting enjoyed by travelers in the Dirty Devil will be compromised as one exits and links multiple canyons. With this in mind, there should be no VRM class 4 in the bench lands between Buck, Pasture, White Roost and the North and Middle Forks of Robbers Roost Canyons. These areas should have, at a minimum, VRM class 2 viewsheds. From Buck to Happy Canyons, canyon rims within the viewshed of side canyons should retain, at a minimum, VRM Class 2, to "retain the existing character of the landscape" (DRMP, map 2-3).	The RMP process establishes specific management objects for the area's visual resources based on the various resources uses and values. These designations are developed through public participation and collaboration. Subsequent to the land use planning process, a determination is made whether proposed surface-disturbing activities or development will meet the visual resource management objectives established for the area and whether design adjustments will be required. A visual contrast rating process is used for this analysis, which involves comparing the project features with the major features in the existing landscape using the basic design elements of form, line, color, and texture. This process is described in the BLM Handbook H-8431-1, Visual Resource Contrast Rating. The analysis is then used as a guide for resolving visual impacts. Once every attempt is made to reduce visual impacts, the BLM managers can decide whether to accept or deny project proposals. Managers also have the option of attaching additional mitigation stipulations to bring the proposed surface-disturbing activity into compliance.	Visual Resources
Gary Cukjati aaron_bannon @nols.edu	National Outdoor Leadership School	The RFO should consider conducting a new viewshed inventory, which would significantly improve its ability to assess the existing quality and significance of viewsheds in the SRMA to backcountry users. Assigning appropriate VRMs requires a careful assessment of recreation patterns.	The Draft RMP/EIS uses the exisiting Visual Resource Inventory. The best available data was used in developing the Draft RMP/EIS.	Visual Resources
Gary Hallows	Utah Cattlemen's Association	Frequently, we find that wilderness study areas in theory provide for continued grazing, but in reality make managing the livestock and resources difficult. Effective livestock grazing is a management tool that can enhance the lands, reducing the risk of damaging wildfires and	WSAs will be managed under BLM's "non-impairment" standard (the Interim Management Policy for Lands Under Wilderness Review (IMP)) until Congress acts. The IMP does allow for livestock grazing. Management of range improvements must follow direction in the IMP. Any changes to these policies are	Livestock Grazing

Commentor	Affiliation	Comment	Comment Summary Response	Category
		weed invasion. Managed livestock grazing also is often very beneficial to wildlife and plant species. As managers of livestock, wilderness areas and wilderness study areas limit the ability of producers to access the lands and complete beneficial management activities.	outside the scope of this NEPA document.	
Gary Tsujimoto	U4WD - Wasatch Cruisers	Another concern I have is limiting group size to 10 under the "criteria for special recreation permits". 10 is too small to accomodate groups such as Boy Scouts, church groups, family reunions, club runs. Also a limit of 2 hours per spot in my opinion is also unrealistic.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Gary Tsujimoto	U4WD - Wasatch Cruisers	Many of my trips into this area include overnight camping. If access is limited or eliminated to existing camp sizes, it will be very difficult to camp away from the main road and or other campers.	The management suggested within the comment was included within the range of alternatives. Many routes which provide access to campsites have been identified and would be designated routes. Appendix 9 provides criteria to consider the addition of designated routes in future if necessary to better address resources and resource use conflicts.	Recreation
George and Frances Alderson		Where the only purpose and need of a certain segment is for BLM management or authorized private uses such as grazing and minerals, the route should be gated to keep out random ORV traffic.	Routes are evaluated on a case-by case basis, depending on varying resource values.	Travel Management – OHV Route Identification
George and Frances Alderson		We saw ORV tracks in Cottonwood Wash and Burro Wash, indicating a possible violation. Both are good habitat for desert wildlife, and they connect with Capitol Reef NP national park about 1 mile west. Closure would help prevent ORVs from driving into the park boundary.	Closure was considered within the range of alternatives for these routes. The Cottonwood Wash route would be designated to the State land. The Burro Wash route has been identified for closure in coordination with CRNP.	Travel Management – OHV Route Identification
George and Joni Britton jonibritton@gmail.com		regarding the proposal for oil and gas leases in the area of Wayne County and specifically for the Loa , Fremont, Lyman and Bicknell Valley and surrounding area. To avoid the unfavorable impact on wildlife, native American archaeological and religious treasures in this valley and surrounding area, we would like to suggest that you do as was done in Sevier County near Sigurd, and select areas near existing blacktop roads for the oil and gas exploration. It seems this would do the least damage to wildlife and archaeological sites.	Limiting oil and gas activities to areas near existing blacktop roads would adversely affect the potential for oil and gas development.	Minerals and Energy - Oil and Gas
Gerald Mac Donald grmacd1141@yahoo.com		Declare the Canyonland wild burros and their habitat an Area of Critical Environmental Concern (ACEC) as the cumulative impacts to their national populations under BLM management plans and decisions have reduced them to less 2,700 or less with only 5.6 million acres of habitat still remaining. America's wild horses and burros have been declared our national heritage species of historical and cultural importance and I want the BLM to know I value them for the diversity and beauty they add to our lands. Permanent protections must be put in place as they are again "fast disappearing" from the American scene!	The relevant and important values identified in the ACEC process are proposed for ACEC designation in one or more alternatives and in many cases where ACECs are not proposed for designation, these values are provided protective measures by other management actions. The management of ACECs is considered within the entire spectrum of BLM's multiple-use mandate.	Areas of Critical Environmental Concern
Gerald Mac Donald grmacd1141@yahoo.com		I would like to express my support for Alternative D in the Richfield Draft Resource Management Plan that would raise the Canyonland Herd Management Areas wild burro population to a range of 120-200 wild burros. However, I would like the BLM to make the following	There are adequate vegetation resources to increase the herd size to 120-200, however, water sources are very limited. There is not enough water to support this range of herd size year round. There are no actions in the RMP that would elimate or transfer acreage or water within the HMA. There are no actions in the	Wild Horses and Burros

Commentor	Affiliation	Comment	Comment Summary Response	Category
		modifications to ensure the permanent preservation of the Canyonland burros, their HMA and the critical habitat requirements they need to survive. * No acreage or water sources should be eliminated, transferred or sold from the historical Herd Areas or Herd Management Areas. * All natural water sources currently being used by the Canyonland burros must be permanently protected and guaranteed and if necessary to preserve viable herds, water developments must be allowed to be constructed and maintained within the Herd Management Area. * No wild horse/burro range or critical habitat requirements should be transferred to agencies that refuse to protect wild horses and burros (such as the National Park Service, who does not "manage them" and considers shooting them as a humane population control method). * The BLM has acknowledged that the Canyonland wild burros are a rare type of burro in the wild and clear and detailed preservation plans must be provided for them, including proper forage and water allocations to support the proposed population range of 120-200 wild burros, even if it requires reductions in livestock grazing to support viable herds. * Do not allow big game species, whose numbers far outweigh the remaining burros on public lands, to be managed as a priority within the Herd Management Area. *	RMP that would transfer mangement of the wild horses and burros to other agencies. Livestock grazing on 30% of the Canyonlands HMA has been relinquished to the Canyonland Trust, with no plans for livestock grazing to occur in these areas. A detailed plan for the Canyonlands burros is outlined in the AML (Appropriate Management Level). There are no plans to give prioirty to wildlife over burros within the HMA; UDWR manages wildlife populations, BLM's authority is to manage burro populations.	
Glen Nebeker glen.nebeker@ westernls.com	Western Land Services	Extensive use of Visual Resource Management (VRM) classifications is another area of concern in the DRMP. In the Preferred Alternative, 209,000 acres would be designated as VRM Class II, which severely restricts the surface disturbance from oil and gas activities and renders infill development virtually impossible. Large portions of the Covenant Field would be designated as Class II. This restriction on the Covenant Field should be removed to ensure this vital energy resource is accessible to Utah and the nation.	In the Draft RMP/EIS Alternative B, the Covenant Field would be designated as VRM Class IV (Map 2-3).	Minerals and Energy - Oil and Gas
Glen Nebeker glen.nebeker@ westernls.com	Western Land Services	These substantial winter drilling restrictions will shut out operators for six months, leaving a very limited time for oil and gas activity. Land managers should have the flexibility to approve projects that propose innovative ways to mitigate the impacts on wildlife in exchange for yearround drilling, such as directional drilling projects. With winter stips, a drilling rig has to be relocated at the end of the season, which extends the timeframe for drilling activity from a concentrated period of time to several years.	The Draft RMP/EIS includes exceptions for timing limitations on oil and gas leasing (appendix 11). The Final RMP/EIS has been revised to include the following exception for the crucial and high value mule deer and elk habitat timing limitation. "Consider exception if deer and/or elk are not present or if the lessee/operator can demonstrate that adverse impacts can be mitigated."	Minerals and Energy - Oil and Gas
Glen Nebeker glen.nebeker@ westernls.com	Western Land Services	I am very concerned about the proposal to manage lands with wilderness characteristics as socalled Wilderness Study Areas (WSA). There is no justification and no mandate in the Federal Land Policy and Management Act (FLPMA) and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the 603 Process was completed, the agency was done with its Wilderness review. The question of which lands should be included in the National Wilderness	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Preservation System is now between Congress and the American people.	integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	
Glen Nebeker glen.nebeker@ westernls.com	Western Land Services	The Draft RMPEIS failed to adequately consider reasonable access to Federal and private minerals and to consider the effects its proposed management strategy will have on current and future oil and gas exploration and development activities, and on the rural economy.	As stated on page 2-69 of the Draft RMP/EIS: "All motorized or mechanized travel would be prohibited in closed areas, with the following exceptions: – For emergency and other purposes as authorized under 43 CFR 8340.0-5(a)(2),(3),(4) and (5); – Minimum use necessary to exercise a valid existing right or authorized use."	Transportation
Glen Zumwalt		Many of the BLM lands in Sanpete County are on the 'for sale/trade' list. I feel first consideration for any sale or trade should be given to the local, county or state governments for public purposes (wildlife habitat, recreation areas and the like) rather than to private interests.	The local governments were given the opportunity to identify isolated and/or uneconomical parcels that they may have interest in as part of the RMP process. The tables in Appendix 5 identify parcels that local governments desire for potential future community expansion. However, local, county, or state governments may apply for any of the parcels identified in the tables for FLPMA Section 203 sale or other public land under other current authorities for public purposes. Preference is generally given to applicants that would provide a public benefit.	Lands and Realty
Glen Zumwalt		I feel the Criteria for Special Recreation Permits is unrealistic. Ten vehicles or more is a ridiculous number and can include anything from small motorcycles to jeeps. Organized groups and vehicles remains undefmed and can include groups ofneighbors, families, friends, and the like. The advantage ofpermitting lies in the commitment to meet stipulations that are consistent with the RMP. Make it easy and desirable to get a permit.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Glen Zumwalt judyz@cut.net		Many of the BLM lands in Sanpete County are on the 'for sale/trade' list. I feel first consideration for any sale or trade should be given to the local, county or state governments for public purposes (wildlife habitat, recreation areas and the like) rather than to private interests.	The local governments were given the opportunity to identify isolated and/or uneconomical parcels that they may have interest in as part of the RMP process. The tables in Appendix 5 identify parcels that local governments desire for potential future community expansion. However, local, county, or state governments may apply for any of the parcels identified in the tables for FLPMA Section 203 sale or other public land under other current authorities for public purposes. Preference is generally given to applicants that would provide a public	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
			benefit.	
Glen Zumwalt judyz@cut.net		Additionally, dispersed camping is one of the major attractions to undeveloped areas in the RFO management area. The 150 foot limitation from designated routes significantly reduces the opportunity for good dispersed camping experiences. Spurs that access dispersed camp sites need to be identified on the travel plan and campsites within 300 feet of any travel plan route need to be permitted.	The management suggested within the comment was included within the range of alternatives. Many routes which provide access to campsites have been identified and would be designated routes. Appendix 9 provides criteria to consider the addition of designated routes in future if necessary to better address resources and resource use conflicts.	Recreation
Glen Zumwalt judyz@cut.net		visitations to surrounding national parks, monuments, recreation areas and state parks is declining. Visitation to areas similar to those managed in the RFO, such as the GrandStaircaseNational Monument, decreased by 41% from l999 to 2002 (as noted in the DRMP). The Grand Staircase severely limited travel opportunities and dispersed camping, drastically reducing the freedom of outdoor recreationists. Areas available for freedom-loving recreationists are being significantly reduced while the numbers of those people seeking this type of outdoor recreation are increasing. The largest group, and the one with the largest increase, is the OHV recreationist. Public land managers who are not constrained with set aside special purpose lands have an obligation to provide resource benefits to the majority of their users. Alternative B does not properly address that need.	The BLM is required to manage public lands according to the multiple use, sustained yield concepts mandated by FLPMA. The commentor fails to subtantiate any of the claims of use levels.	Recreation
Glen Zumwalt judyz@cut.net		On the ground presence could be enhanced with cooperative agreements with user groups which can promote proper land use ethics as well as communicate RMP designations and restrictions.	The commentor's suggestion valid, and consistent with current BLM policies. Throughout the implementation process the BLM will seek cooperative agreements.	Recreation
Glen Zumwalt judyz@cut.net		I feel the Criteria for Special Recreation Permits is unrealistic. Ten vehicles or more is a ridiculous number and can include anything from small motorcycles to jeeps. Organized groups and vehicles remains undefined and can include groups of neighbors, families, friends, and the like. The advantage of permitting lies in the commitment to meet stipulations that are consistent with the RMP. Make it easy and desirable to get a permit.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Glen Zumwalt judyz@cut.net		First, the proposed travel management plan severely restricts OHV use from the current land use plan. Currently 78% of the RFO lands are open for public travel. It is obvious additional restriction of travel from open (cross country) to designated roads and trails is needed. However, Alternative B recommends only 8,400 acres of open lands, or 0.4%, a decrease of 192 times. Some 1,900 acres are in SanpeteCountynear Mayfield. Such a reduction will concentrate open riders in a few isolated areas, creating additional management problems and over utilizing the ground. It is important to provide recreational opportunities for one of the fastest-growing and largest recreational use by the public. Many of the open areas included in Alternative A would be appropriate in Alternative B.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Glen Zumwalt		Factory Butte SRMA in Alternative B is too small for desired recreational	The Factory Butte emergency closure order is independent of and outside the	Travel

Commentor	Affiliation	Comment	Comment Summary Response	Category
judyz@cut.net		opportunities. Wayne County, which will be most affected by open closures in the Factory Butte area, has offered a compromise plan. This plan has been well thought out, protects on the ground resources, including T&E species, but still allows open recreational opportunities.	scope of this RMP planning process. Further, the BLM has no duty to obtain input from the public prior to issuing a restriction order under the 43 CFR. Threats to threatened and endangered species in the Factory Butte area were first identified as an issue in the 1982 Henry Mountains MFP. Protection of threatened and endangered species in the Factory Butte area has been a management issue ever since and has been carried forward as a management issue in the RMP process by BLM staff.	Management – OHV Area Categories
Glen Zumwalt judyz@cut.net		A significant area of the RFO's 2,100,000 acres needs to be kept open for travel by OHV's and dispersed camping needs to be maintained without undue restraints in the RMP. In order for open areas to provide desirable recreational experiences they must be large enough and dispersed enough to avoid crowding and overuse of the ground. At least ten percent of the RFO's management area should be designated to open travel.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. The comment lacks specificity for consideration of which open areas should be included.	Travel Management – OHV Area Categories
Glen Zumwalt judyz@cut.net		I feel the RMP should provide for establishing new routes, changing open routes, providing looping routes and management and maintenance of the route system.	The PRMP/FEIS has been revised to include a description of the process the Richfield Field Office (RFO) used for developing route designation alternatives for the Richfield Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The appendix includes criteria to be considered when conducting plan maintenance, amendments, or revisions related to OHV area designations or the approved road and trail system within "Limited" areas.	Travel Management – OHV Route Identification
Glen Zumwalt judyz@cut.net		The RFO managed lands already contain 446,900 acres of WSA's, or 21% of the total. Additional areas inventoried as lands with wilderness characteristics and ACEC's dramatically restrict opportunities to expand or improve OHV recreation.	The commentor's request has been largely considered within the DRMP/DEIS range of alternatives. For example, DRMP/DEIS Alternative B would allow OHV recreation to continue on existing routes within WSAs, would reduce the amount of ACECs from the "No Action" alternative and would designate no special management prescriptions for non-WSAs with wilderness characteristics.	Wilderness Study Areas
Glenn Olsen Goawsinstall@msn.com		At the Coral Pinks the Tiger Beetle is the issue and the affected area is fenced off. Fence off the area and monitor it.	BLM will consider fencing sensitive areas on a case-by-case basis as considered necessary. These are individual project decisions; therefore, an RMP decision for this action is unnecessary.	Special Status Species
J.B. Washburn jbw@jbwashburn.com		BLM should recognize the RS2477 road claims that are part of Sanpete, Sevier, Piute, Garfieldand Wayne County Transportations Plans. The validity of these claims should be determined before a final decision is made in this RMP. I believe Sanpete, Sevier, Piute, Garfieldand WayneCountiesshould be consulted regarding all road decisions prior to finalizing the RMP.	As specified in the Draft RMP EIS page 1-10 addressing RS 2477 assertions is 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.	Travel Management – OHV Route Identification
Jack Christensen	U4WDA and Wasatch Cruisers	I do not believe the group size should be limited to 10 vehicles. This number is unrealistic and makes group events such as family events impossible. Additionally, the 2 hour limit is totally unrealistic. I would prefer a group limit of 25 vehicles with no time limits.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Jackie West jwest516@gmail.com		In the Richfield Draft Resource Management Plan/Environmental Impact Statement Alternative B, the BLM aims to strike a balance between protection of resources and multiple uses such as oil and gas development, OHV recreation, and grazing. I appreciate the hard	The DRMP/DEIS includes a detailed evaluation of all options to ensure a balanced approach. This balanced approach will ensure protection of resource values and sensitive resources while allowing opportunities for mineral exploration and production. The PRMP/FEIS will offer management flexibility to	Adequacy of Analysis and Alternatives

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		balancing act that the BLM must do, but I am concerned about the impact of the \"Preferred Alternative\" on the nation\'s energy supplies and the negative economic impacts. I am also concerned about pressure from environmental groups that may result in protecting 682,600 acres of wilderness characteristics areas as de facto wilderness, as specified in Alternative D.	ensure that resource values and uses are protected.	
Jackie West jwest516@gmail.com		In the Richfield DRMP/EIS, the BLM has failed to adequately consider reasonable access to federal and private minerals and to consider the effects its proposed management strategy will have on current and future oil and gas exploration and development activities, and on the rural economy. A recent study by the University of Utah\'s Bureau of Economic and Business Research found that the average wage for oil and gas exploration and production jobs in Uintah County is $84,795, more than double the county average wage of $39,056. Artificially limiting energy development in the Richfield Planning Area and taking 682,600 acres out of productive use will deny the local economy of similar benefits.	The Draft RMP/EIS discloses areas that are available to be leased, there are reasons why certain parcels of land are not available to be leased such as cultural resources, WSAs, ACECs, and habitat for threatened and endangered plant and animal species. Acres unavailable for oil and gas leasing can not be directly correlated to loss of income or economic benefits.	Minerals and Energy
Jackie West jwest516@gmail.com		Another area of restrictions I\'m concerned about is the extensive use of blanket winter stipulations in the Preferred Alternative. These substantial winter drilling restrictions will shut out operators for six months, leaving a very limited time for oil and gas activity. Land managers should have the flexibility to approve projects that propose innovative ways to mitigate the impacts on wildlife in exchange for year-round drilling, such as directional drilling projects. With winter stips, a drilling rig has to be relocated at the end of the season, which extends the timeframe for drilling activity from a concentrated period of time to several years. Multi-well pads must be considerably larger when the rig must be removed and reassembled. When a rig can stay on site year round, drill multiple wells, and then leave, less maneuver room on the pad is necessary, and total drilling time is reduced. The winter stips in Alternative B should be revised to give land managers th! is flexibility.	The Draft RMP/EIS includes exceptions for timing limitations on oil and gas leasing (appendix 11). The Final RMP/EIS has been revised to include the following exception for the crucial and high value mule deer and elk habitat timing limitation. "Consider exception if deer and/or elk are not present or if the lessee/operator can demonstrate that adverse impacts can be mitigated."	Minerals and Energy - Oil and Gas
Jackie West jwest516@gmail.com		BLM completed its wilderness inventories years ago and may not designate new WSAs or any other areas to be protected under the non-impairment standard. BLM has no duty under FLMPA or any other statute to protect \"wilderness characteristics.\" BLM should treat these lands as standard public lands and manage them for multiple use.	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			enough to provide sufficient latitude for periodic adjustments in use. . .” FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	
Jackie West jwest516@gmail.com		I am very concerned about the proposal to manage so-called \"non-Wilderness Study Area (WSA) lands with wilderness characteristics\" to maintain wilderness. There is no justification and no mandate in the Federal Land Policy and Management Act (FLPMA) and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the \"603 Process\" was completed, the agency was done with its Wilderness review. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so would obviate the FLPMA mandate, USC Â§1702 (c) (\"Section 103(c)\"), of multiple use and result in a loss of economic development in the local community and a denial of energy resources for the state and nation.	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM’s authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM’s organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary’s authority to manage lands as necessary to “achieve integrated consideration of physical, biological, economic, and other sciences.” FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . .” FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	Non-WSA Lands with Wilderness Characteristics
Jackie West jwest516@gmail.com		Extensive use of Visual Resource Management (VRM) classifications is another area of concern in the DRMP. In the Preferred Alternative, 209,000 acres would be designated as VRM Class II, which severely restricts the surface disturbance from oil and gas activities and renders in-fill development virtually impossible. Large portions of the Covenant Field, the portion of the planning area with the highest potential for oil and gas, would be designated as Class II. This restriction on the Covenant Field should be removed to ensure this vital energy resource is accessible to Utah and the nation.	BLM currently manages some of the Covenant Field as VRM Class II. The Richfield Field Office has developed and implemented best maangement practices (BMPs) for visual impacts associated with oil and gas development.	Visual Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
James Thompson dc15james@msn.com		Limiting group passes to ten vehicles inhibits family and club travel of organizations that should be supported, youth groups, boy scouts, it fails to monitor the one or two vehicle loads of miscreants that cause damage to historic sites and abuse privilege.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Jan Burton		I have spent a lot of time in Capitol Reef. The Fremont River is also deserving ofthe "Wild and Scenic" designation. I am not familiar with all segments, but the river is certainly scenic from the upscale Red Lodge into Torrey, and beyond.	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Jason Goates	MY4x4 & U4WDA	Also, 10 vehicles is very unrealistic for a group size. I'm in support of the idea of 25 vehicles & 50 people.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Jason Ogden		This line is at the top of hill need to be the new boundry. There is a trail on top of the hill thats why.	This is beyond the scope of the RMP EIS for the RFO. Physical barriers and enforcement of closures on Glen Canyon National Recreation Area is under the NRA's jurisdiction.	Travel Management – OHV Route Identification
Jean McIntyre		Tracts 19 and 20 (T30S, R5E, Sec. 3 E1/2 SE1/4; and T30S, R5E, Sec. 11 W1/2 W1/2 (less mineral patent 43-77-006). Tract 20 is adjacent to my property, and Tract 19 lies in my view shed. These properties provide critical habititat for native species of mule deer, elk and wild turkeys, which in turn provide food sources for bobcats and mountain lions in the area. I have occasionally found the fresh tracks of these large cats on my property, along with claw marks on Pinion and Poonderosa Pines obviously used as scratching posts. These tracts also provide temporary habitat for migrating species.	Prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: "Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action" This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal. BLM will conduct site-specific NEPA analysis that will consider suitability of specific parcels for disposal.	Lands and Realty
Jean McIntyre		Tracts 19 and 20 (T30S, R5E, Sec. 3 E1/2 SE1/4 SE/4; and T30S, R5E, Sec. 11 W1/2 W1/2 (less mineral patent 43-77-006). Tract 20 is adjacent to my property, and Tract 19 lies in my view shed. Last Chance Townsendia, a threatened plant species, grows on these lands. They are worth protecting as a natural habitat from the threat of commercial or residential development.	Conservation strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: "Critical Elements	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
			of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action" This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	
Jean McIntyre		These lands also lie in the viewshed of Utah Highway 12, a designated All-American Highway which attracts tourists from all over the world to the area. The BLM Draft RMP does not acknowledge the impact development would have on Highway 12's distinctive All-American Highway status, and in fact, the BLM's preservation of that viewshed is part of the agreement involved with the All-American Highway designation	BLM is currently developing a management plan for Utah Highway 12. The RMP would be consistent with this plan.	National Trails & Backways
Jeff Richards	PacifiCorp	Issue 15 - Proposed Areas of Critical Environmental Concern, Alternatives C and D (Table 2.;.22, Page 2-120; Pages 4-450 and 4-451; also Map 2-44) The BLM's Map 2-44 represents two areas along the Interstate 89 Corridor northeast of Richfield, UT and north of Marysville, UT as Areas of Critical Environmental Concern (ACEC). These are designated Rainbow Hills and Sevier Canyon. PacifiCorp transmission lines currently extend either through or near these areas, as represented by PacifiCorp's Map 2-44 that superimposes transmission facilities on the BLM base map. Neither of these proposed areas are represented on Map 3-16 as existing areas of critical environmental concern. As Alternatives C and D place the most emphasis on protection of special and sensitive resources, these two options are most restrictive insofar as PacifiCorp's facilities are concerned. If our transmission lines cross these properties, PacifiCorp has concerns that this designation could affect our maintenance and service needs on existing facilities within the areas. Necessary activities (pole replacement, conductor and/or insulator replacement, etc.) would typically occur within the company's existing transmission right-of-way. However, PacifiCorp must retain the right to service our existing power line(s) if maintenance is required within ACEC area(s) represented on the map. Recommended Revision/Action PacifiCorp recommends that the following wording be added in Sections 4.5.3.2.13 and 14 under the heading Impacts from Special Designations (relative to Alternatives C and D) to supplement the discussions: "When work on transmission facilities in designated ACEC areas is required, precautions shall be enacted to ensure that sensitive areas are adequately stabilized and suitable measures are taken to restore the surface, as close as possible, to a pre-construction	The Proposed RMP/Final EIS has been modified to acknowledge administrative access for valid existing rights.	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
		condition. However, necessary service and maintenance work within the established transmission corridors is allowed".		
Jeff Richards	PacifiCorp	Issue 5 - Access Under Emergency Situations - (General) PacifiCorp is concerned that the EIS does not address electrical emergency situations. In an electrical emergency situation, PacifiCorp must be able to enter onto and conduct repairs or adjustments within a rights-of-way area governed by a ROW grant at any time.	If Pacificorp has a valid right-of-way, as authorized within 43 CFR 8340.0-5, it will be honored. See Chapter 2-71 table 2-17 Travel Management Decisions.	Health and Safety
Jeff Richards	PacifiCorp	Issue 1 - Transportation and Utility Corridors (Table 2-18, Page 2-81; Appendix 5, Page A5-10) PacifiCorp recommends that BLM add the following language to this discussion: "Power transmission lines shall be co-located where possible within either new or existing corridors in a manner that protects and preserves the safety and viability of these facilities" .	This concern is addressed in the Draft RMP-EIS, Table 2-18 (page 2-76) desired outcomes for lands and realty. New rights-of-way actions within existing corridors or rights-of-way would include terms and conditions to protect prior existing rights.	Lands and Realty
Jeff Richards	PacifiCorp	Issue 1 - Transportation and Utility Corridors (Table 2-18, Page 2-81; Appendix 5, Page A5-10) PacifiCorp also recommends that BLM designate energy corridors in areas where PacifiCorp has submitted proposed corridors as part of the West-Wide Energy Corridor Programmatic Environmental Impact Statement (PEIS). We have attached a map that shows the locations of the proposed utility corridors contained in the draft EIS as compared to the locations of the proposed energy corridors that were submitted by PacifiCorp to the Department of Energy for consideration as part of the PEIS. It should be noted that PacifiCorp's proposed energy corridors depicted on the map simply connect two end points of energy resource areas and areas of energy demand. We did not apply engineering design or environmental analysis when developing these options. An electronic version of this map is contained on the enclosed CD. PacifiCorp supports the establishment of energy corridors throughout the Richfield BLM Resource Area.	The West-Wide Energy Corridor PEIS would amend the Richfield RMP when it is finalized.	Lands and Realty
Jeff Richards	PacifiCorp	Issue 3 - Managing Rights ofWay (Table 2-18, Page 2-79) Section 2.6.2.5 table 2-18 page 2-79 Managing ROW; second line under "Common to all alternatives" states, "When compatible require multiple communications site users to share same sites and buildings, and same facilities." Recommended Revision/Action PacifiCorp requests that the statement be amended to the following: "Where it does not present a reliability or safety issue, and is a commercially acceptable communication site users shall same sites and buildings, and same facilities".	The language in the Draft RMP-EIS that states "when compatible" implies that safety and reliability issues will be considered in the terms and conditions.	Lands and Realty
Jeff Richards	PacifiCorp	Issue 6 - Impacts from Travel Management (Section 4.4.5; Pages 4-313, 4-315, and 4-316) Under the discussion of Environmental Consequences in Chapter 4, Alternatives B (the Preferred Alternative), C and D discuss travel restrictions within the study area. Paragraphs note: "This alternative would close [specified] acres to motorized use, which would eliminate all opportunities for land use authorizations	Travel management decisions would restrict casual OHV use. Existing ROW holders will retain authorized administrative access for operations and maintenance activities, and therefore no impacts would be anticipated for these uses.	Lands and Realty

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		requiring motorized vehicles or mechanized vehicles". The paragraphs continue with: "The remainder of the RFO ... would limit opportunities for land use authorizations to areas along those designated routes if the activity required motorized or mechanized vehicle access for construction, operation, or maintenance (unless administrative access was granted for such purposes) for land use authorizations to those areas". These statements, particularly the first cited sentence, do not appear to allow necessary access to transmission facilities for inspection and/or maintenance needs.Recommended Revision/Action PacifiCorp requests that the BLM add the following language to this discussion: "Access to and from transmission facilities for operations and maintenance purposes is allowed within existing rights-of-way in all areas where such facilities exist."		
Jeff Richards	PacifiCorp	Issue 8 - Renewable Energy (Section 3.4.5.5, Page 3-76) In Chapter 3 within the discussion on Resource Uses, a referenced study entitled "Assessing the Potential for Renewable Energy on Public Lands" concludes that potential development of energy resources is low due to distance from roads, transportation facilities, and population centers. This statement assumes that transmission facilities are co-located with energy resources. While proximity to transmission or population centers represents one element of energy development, it does not follow that new transmission facilities and corridors would not eventually be needed to distribute energy from other sources across the study area.	The information contained in this section is baseline material included as part of the affected environment. The statements included were quoted from existing reports, including Assessing the Potential for Renewable Energy on Public Lands (USDI and USDOE 2003) and Wind Energy Development, Final Programmatic Environmental Impact Statement (PEIS) (BLM 2005c). The RMP includes a desired outcome (Table 2-18, page 2-76) "Use right-of-way corridors and collocate new proposals within existing sites or right-of-way areas, to the extent practical, in order to minimize adverse environmental impacts and the proliferation of separate rights-of-way."	Lands and Realty
Jeff Richards	PacifiCorp	Issue 16 - Transmission Line Rights of Way Location (Appendix 5 Table A5-9 page A5-1O) Recommended Revision/Action PacifiCorp recommends Note #5 be amended to read as follows: "Transmission lines will be located adjacent to each other where it does not create a reliability or safety concern and as close to each other as allowable under Western Electric Coordinating Council and North American Electric Reliability Company standards."	Table A5-9 Note 5 was modified to incorporate actions allowed under utility standards for safety and reliability.	Lands and Realty
Jeff Richards	PacifiCorp	Issue 17 - Designated Right of Way Corridors (Appendix 5, Table A5-9, Page A5-9 and 10) Recommended Revision/Action PacifiCorp recommends the list of identified corridors should include PacifiCorp 138 kilovolt Sigurd to West Cedar line. Also, the PacifiCorp Sigurd - Antimony/Arizona line is shown as 345 kilovolt; the line is 230 kilovolt.	The following was added to Table A5-9 Designated Right-of-way Corridors: UTU-081591 PacifiCorp (Sigurd-Sevier) 138 kV Transmission Line; ¼ mile each side of centerline.	Lands and Realty
Jeff Richards	PacifiCorp	Issue 20 - Wind Energy Development (Appendix 15, Page AI5-1) For wind energy to develop and operate, there is a need to provide distribution or transmission lines connecting the wind facility to the electric grid. In Appendix 15, there is no mention of ROW development for electric distribution or transmission lines required to support the development and operation ofwind energy facilities. Recommended Revision/Action PacifiCorp recommends adding a third paragraph under the opening comments on page A15 to read: "When wind energy	This concern is addressed in Appendix 15 (page A15-4) in the fourth bullet under plan of development preparation, general: "To plan for efficient use of the land, necessary infrastructure requirements shall be consolidated wherever possible, and current transmission and market access shall be evaluated carefully."	Lands and Realty

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		development is approved, it will allow for the additional electrical transmission corridors that will be required."		
Jeff Richards	PacifiCorp	Issue 18 - Surface Disturbance Due to Oil and Gas Activity (Appendix 12 page AI2-1O) In discussion of surface disturbance, there is no mention of transmission ROW development required to support Oil and Gas development. Recommended Revision/Action PacifiCorp recommends adding the following language to the Summary, "Total surface disturbance ...= 8,180 acres. However, additional ROW will be required for electrical facilities to support oil and gas development."	The anticipated disturbance from oil and gas wells includes associated facilities (see Appendix 12 of the Draft RMP/EIS).	Minerals and Energy - Oil and Gas
Jeff Richards	PacifiCorp	Issue 13 - Potential Best Management Practices: Surface Disturbing Activities (page A14-1,2; AA-2) Recommended Revision/Action Based on these statements, PacifiCorp recommends that alternate procedures be allowed that would accomplish similar results while meeting RMP goals and objectives. We also recommend that the following wording: "An on-the-ground inspection by a qualified archaeologist, historian or paleontologist is not required for sites and areas where significant surface disturbance has previously occurred unless specific knowledge or circumstances warrant further investigation."	The BMPs identified are techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts and negative environmental impacts from management actions. The lands and realty management actions in Chapter 2 allow for flexibility in applying these BMPs. Any change to the NEPA process would be beyond the scope of this RMP planning process.	Other
Jeff Richards	PacifiCorp	Issue 14 - Potential Best Management Practices: Riparian/Wetland Areas (page A14-5) Recommended Revision/Action PacifiCorp recommends that the statement be modified to include the following addition: "Avoid locating roads, trails and landings in wetlands if possible. Where circumstances necessitate locating transmission or other facilities within these areas, such facilities shall include suitable design features and/or mitigation measures as required to minimize impact or disturbances and ensure sensitive resources are adequately protected."	BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions.	Other
Jeff Richards	PacifiCorp	Issue 19 - Best Management Practices Reducing Impacts on VRM Class IT and Class III (Appendix 14 page AI4-5) The first bullet states, "Bury distribution power lines and flow lines in or adjacent to access roads. Recommended Revision/Action PacifiCorp recommends the underground statement be revised to read as follows; "Where feasible due to terrain and geological conditions and where it does not impose a risk to safe and reliable operation of the system, burial of underground distribution power lines in or adjacent to access roads will be considered."	BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions.	Other
Jeff Stevens drtsqrl@frontiernet.net	MoabFriends-For-Wheelin'	The BLM should seek out alternate methods to manage and protect the land, without giving it a WC designation. Some of these areas have historically used machine built roads, historical ranching, and mining impacts.	BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it	Non-WSA Lands with Wilderness Characteristics

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			clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	
Jeff Stevens drtsqrl@frontier net.net	MoabFriend s-For-Wheelin'	We do not believe that group sizes should be limited to 10 vehicles under the proposed Criteria for Special Recreation Permits. This number is unrealistic and makes group events such as family picnics or scouting events very difficult. In addition, we do not believe an SRP should be required to recreate in an area for two or more hours.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Jeff Stevens drtsqrl@frontier net.net	MoabFriend s-For-Wheelin'	BLM should recognize the RS2477 road claims that are part of Sanpete, Sevier, Piute, Garfield and Wayne County Transportations Plans. The validity of these claims should be determined before a final decision is made in this RMP.	As specified in the Draft RMP EIS page 1-10 addressing RS 2477 assertions is 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.	Travel Management – OHV Route Identification
Jeffrey S. Floor jfloor@jps.net		Section 2.6.3.3: The ACECs designated in Alternative B are wholly inadequate. Similar concern as expressed with comments on Section 2.6.1.12, above. Alternative D represents a far more appropriate and thorough treatment of the issue.	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection ACEC. The BLM gave full consideration to the designation and preservation ACEC during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period. A total of 27 ACEC nominations were received and the relevance and importance of each were determined. Two of the ACEC nominations were found to meet both the criteria of relevance and importance and all these were included for special management as proposed ACECs in Proposed RMP. The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
			prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.	
Jeffrey S. Floor jfloor@jps.net		Section 2.6.1.12: Alternative B seems to remove from future consideration any non-WSA lands with wilderness characteristics, almost by default. This not consistent with the agency's own stated goals for this type of land to "Protect or preserve the wilderness characteristics …of non-WSA lands with wilderness characteristics…" and "to preserve their undeveloped character and scenic quality, and to provide opportunities for primitive and unconfined recreational activities and experiences of solitude…" This will leave open to irreparable damage numerous areas of outstanding wilderness value.	A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA. The Proposed RMP/Final EIS has been revised to include management of certain non-WSA lands with wilderness characteristics.	Non-WSA Lands with Wilderness Characteristics
Jeffrey S. Floor jfloor@jps.net		Section 2.6.2.3: It is troubling that Alternative B does not designate SRMA's in the San Rafael Swell or LabyrinthCanyonareas, that it shows a reduced SRMA for the Dirty Devil categorized as "dispersed recreation", and that Factory Butte is designated as an OHV area. The first three issues demonstrate an unwillingness to manage these lands in a manner that is appropriate to the outstanding wilderness character of these areas – counter to the overarching goal of the wilderness designation process as envisioned by Congress over 40 years ago – and the last issue is probably in violation of the Endangered Species	The recommended management is contained within the range of alterantives for the decisionmaker to consider in developing the Proposed RMP and ROD.	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Act. Alternative D is clearly more consistent with agency goals in all these areas mentioned.		
Jeffrey S. Floor jfloor@jps.net		Section 2.6.3.2: Alternative B does take the right step in recommending the Dirty Devil and FremontRiverfor wild and scenic designation, but it would be a missed opportunity to not accord the same to the sections of waterways listed in Alternative D, particularly RobbersRoostCanyon, Sam' s MesaBoxCanyonand TwinCorralBoxCanyon.	The No Action Alternative includes all river segments that are considered eligible for Wild and Scenic River status; however, no suitability decisions (designating WSR status) have been made. Although all eligible segments are considered in the No Action Alternative, it does not mean all of the eligible segments are suitable for Wild and Scenic River status. Alternative B is the preferred alternative because it provides a balanced approach of protection/preservation of natural resources while providing for commodity production and extraction. Alternative B provides for Wild and Scenic River suitability with less management restrictions to allow for more flexibility in considering other land uses. The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Jeffrey S. Floor jfloor@jps.net		Section 2.6.2.4: It seems that by leaving so much wilderness quality land open to OHV use in Alternative B – even "limited to designated routes and trails" – many WSA may be left vulnerable to the many spurious RS2477 claims that dot the region.	A range of alternatives considered a number of options for the inventoried ways in WSAs.	Wilderness Study Areas
Jerry Larsen	Southern Utah OHV Club	The time frame for public comments is too short considering the difficulty in deciphering what you have planned.	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held six open houses around the State to facilitate review of the Richfield DRMP/DEIS.	Process and Procedures
Jerry Larsen	Southern Utah OHV Club	Alternative B allows for some camping up to 150 feet from the road in existing camping areas. While we applaud this, there are many areas that are more than 150 feet that are still suitable camping areas that need to be designated. Please see included map to show some examples.	The management suggested within the comment was included within the range of alternatives. Many routes which provide access to campsites have been identified and would be designated routes. Appendix 9 provides criteria to consider the addition of designated routes in future if necessary to better address resources and resource use conflicts.	Recreation
Jerry Larsen	Southern Utah OHV Club	a. Designate large camping areas in the locations specified on the enclosed map. It is important to be able to have group camping in suitable areas. The areas we have in mind are by the windrow just off the road in Cainville Wash, the area around the turn going west (a	The Final RMP/EIS has been revised to reflect changes in BLM policies requiring additional detail for SRMAs.	Recreation

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		historic camping spot), the large proposed open area behind the motel in Cainville, the area just off the highway between blue valley and Hanksville (T28S RI0E), and other locations on the road toward the Mars Observatory. These areas will accommodate large or small groups with minimal impact.		
Jerry Larsen	Southern Utah OHV Club	g. The area behind the Cainville Motel needs to be designated as an open area. The latest inventory showed no T&E Cactus there and it is an important area for camping and riding. It is a huge financial burden on the motel to have it closed. The area is pretty much surrounded by impassable mountains and would require very little signage to keep people from going north out of the main bowl.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. Other commentors have submitted a proposal regarding Factory Butte that address this commentor's concerns.	Travel Management – OHV Area Categories
Jerry Larsen	Southern Utah OHV Club	We would suggest, based on the apparent lack of inventoried routes, that you include language in the RMP that allows for easily adding undocumented routes missed during the initial inventory without further NEPA requirements and opening routes that were closed if found to be environmentally acceptable.	The commentor is correct. The BLM has crafted language for this and has been added to the Final RMP EIS.	Travel Management – OHV Route Identification
Jerry Larsen	Southern Utah OHV Club	1. The following trails are either left off your map or have inconsistent management plans with the Forest Service. We recommend you adopt their plan. a. SEGV0055-T.26S. R.IE. Sec 27 b. (No Number)-T.26S. R IE. Sec. 27 c. PTGV008I-T.29S. R.2W. Sec 21 & 22 d. (not on map)-T.29S. R.2W. Sec. 2, 10, II-Trail between Pine and rock Canyons. e. PTGV0080 & 80a-T29S. R.2W. Sec. 10, 14, 15 f PTGV0118 & PTGVOI20-T.28S. R.2.W. Sec. 26 g. SESR0802-T.21.S. R.2W. Sec. 15,22 h. SESR0655-T.22.S.R.2W. Sec, 11 1. SEGV0079-T.26S. R.IW. Sec. 13 J. PTSR0580-T.27S. RAW. Sec. 1 k PTSR0261-T.28S. R.3W. Sec5 1. PTSR0304,305-T.27S. RAW m. SESR0317-T.24S. R2W. Sec. 12 n. SESR0344a-R.24S. RAE. Sec. 5, 6 o. SEFJOOSS & SEFJ0064-T.24S. RAE. Sec. 19,30	These routes were already addressed in Comments 346, 350, 351, 352, 353, 357, 359, 360, 242, 374, and 376. The comment regarding the route in T.26 S., R.1 E., Section 27 was reviewed. The route was identified as open. The number did not print due to the scale of the map.	Travel Management – OHV Route Identification
Jerry Larsen	Southern Utah OHV Club	2. The following trails show up on the Event Analysis for the Rocky Mountain ATV Jamboree and have had the NEPA study done. These routes should all remain open. a. GAGV0048-T.31S.RIW. Sec. 31 b. GAGV0045-T.32S. R.IW. Sec. 6 c. PTSR0261-T.28S. R.3W. Sec. 12 d. SESR0491-T.23S. R IW. Sec. 11 e. SESR0431a, SESR0428-T.23S. R.2W. Sec. 24,25	Previous NEPA opened these routes; Alternatives C and D have been corrected to reflect these designations.	Travel Management – OHV Route Identification
Jerry Larsen	Southern Utah OHV Club	3. Specific suggestions with other trails around Marysvale: a. (Angle) Leave trail PTGV0014 open because it connects to PTGV0013a for recreational purposes. b. (Angle) PTGV007 connects to PTGV008a and PTGVOOSd which is not shown on the map and should be. All these routes should remain open for recreation, wood gathering and cattle management. c. (Angle) PTGV007a continues north through Sections 29 & 20 which is not shown on the map and should remain open. d. (Angle) Because PTGV0013 has been closed, PTGV0013a should remain open seasonally for recreation. e. (Water Creek Canyon)	PTGV0014 to PTGV0013a – This error was corrected. PTGV0014 was confused with PTGV0013. PTGV0014 was corrected to be open and connect with PTGV0013a. Portions of PTGV0014 have been designated as 50" or less for safety and resource concerns. PTGV0013 is physically closed on BLM lands. (On maps it appeared that the commentor had confused PTGV 0005A as PTGV0005D). PTGV0005a - Connector route between PTGV0005a and 0007 was GPS'd in the inventory but inadvertently missing from the published maps. PTGV0005a has been extended to connect with 0007. PTGV0007 - Connector route between PTGV0007 and 0007a was GPS'd in the inventory but	Travel Management – OHV Route Identification

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		Designated Paiute Trail # 40 is not shown on the map. It has a right of way south of SESR0313 in section 12. f. (phenolite Hill) PTGV0029a and PTGV0047 should be open year long. These are low country trails and should remain open. They are Pauite #73 and 61. g. (Marysvale)PTSR0564 should remain open as it connects PTSR396 with PTSR0538. h. (Mt. Brigham) PTSR0189 should remain open to PTSR0188 to retain access to PTSRO188 which is shown as open. i. (Mt. Brigham) PTSR0425 should remain open for mining and recreation. j. (Mt. Brigham) PTSR0005 needs to remain open as it is a connector route and is used for cattle management and recreation. k. (Antelope Range) SESR0098 should remain open for public access and recreational opportunities. l. (Water Creek Canyon) SESR0316 is heavily used by the public and is mostly on state lands and is a connector with SESR381 and should remain open. m. (Marysvale) Paiute side trail 74 from Hoovers to #22 needs to remain open. It is not on your map. n. (marysvale peak) PTSR0345 shows a closed section in the middle of the route. This should remain open. o. (Marysvale peak)PTSR0318 should remain open as a connection route to PTSR0319 and PTSR0311 and PTSR0320 p. (Marysvale peak) PTSR0263 is open on the Forest Service. Needs to be open on BLM. q. (Marysvale) Should connect PTSR0062 with PTSR0050. r. We would suggest an Open riding area in TW26 S4W Sections 24,25, 26. There are no open riding areas in this area and there are already many trails and roads in the area.	inadvertently missing from the published maps. PTGV0007 has been extended to connect with 0007a. Paiute Trail #40 was being constructed during BLM inventory meetings. It was addressed as Route SESR0317 but data was not shown on DRMP route maps. This has been resolved. PTGV0029A and PTGV0047 (Piute Trail #73 and 61) are limited by size, 50" or less with no seasonal restrictions. PTSR0564 was originally identified as abandoned, but GPS data notations did not verify that and the route is obvious on the ground utilizing NAIPs data. This error was resolved. PTSR0425 was analyzed and determined to be abandoned and naturally rehabilitating. PTSR0189 begins on private property, was analyzed and closed due to erosion. PTSR0005 has been identified as open. SESR0098 was analyzed and identified by specialists for closure. SESR0316 was reviewed and identified as access to State Lands and other routes. This has been adjusted as open. Paiute Trail 74 was inadvertently left off of maps and has been corrected (PTSR0411). PTSR0345 was a mapping error, was corrected. PTSR0318 was analyzed within the range of alternatives and was identified for closure to consolidate routes and prevent habitat fragmentation. PTSR0261 was reassessed and identified as open with seasonal limitations for consistency with other FS and BLM route designations. PTSR0263 is not identified onto the FS lands, it has been analyzed by BLM as open with seasonal limitations. No data was available and for safety and resources protection no route has been identified to connect PTSR0062 with PTSR0050. Paiute Trail 76 to 22 are not on BLM public lands. The open riding area was analyzed as part of Alternative N as it is currently open.	
Jerry Larsen	Southern Utah OHV Club	b. In order to make the Lower Blue Hills a more viable recreation area, you need to create some loop trails and connect the lower area to the Factory Butte area. There are currently two ways to cross over. The north route would be up through coal mine wash. The closed route in T27S RI0E needs to be at least partially opened to access Coal mine wash. We understand there is a concern over the T & E cactus on that route. You may need to determine if this trail would really pose a threat. If it does, it may be possible to route the trail up the other canyon and come out by the mine.	Routes in this area were analyzed and designated while addressing other resource concerns. A connector between Lower Blue Hills and Factory Butte would require further ground truthing and site specific NEPA analysis to address resource concerns in this area.	Travel Management – OHV Route Identification
Jerry Spangler	Colorado Plateau Archaeological Alliance	General concerns include the absence of a meaningful and representative statistical sample of inventoried lands within the Richfield Field Office whereby the density, diversity and distribution of cultural resources could be adequately considered during the planning process. Quite simply, the BLM cannot manage resources it does not know exist, and management decisions made without baseline data will inevitably result in adverse and unanticipated consequences to the integrity of historic properties.	The baseline cultural resource data that we used for the RMP is the best available information at the present time and constitutes BLM's present knowledge of the current situation, in accordance with FLPMA. Since the Section 106 and 110 inventories that have been done make up all of the cultural resource information that presently exists here, that is what forms the basis for the RMP discussion. Any surface disturbing activities based on future proposals would require compliance with Section 106 and site specific NEPA documentation.	Cultural Resources
Jerry Spangler	Colorado Plateau	General concerns include the failure of the agency to aggressively embrace its Section 110 responsibilities to identify, evaluate and	The BLM takes its Section 110 responsibility seriously. Up until 1980, Section 106 of the NHPA required agencies to consider the effects of their undertakings only	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Archaeological Alliance	nominate properties under its management jurisdiction to the National Register of Historic Places;	on properties listed on the National Register of Historic Places. At that time, there were efforts to nominate sites to the Register so that they could receive the protection afforded by such a listing. However, the situation changed in 1980 when Section 106 was amended to require agencies to consider an undertaking's effects on properties included in or eligible for inclusion in the National Register. Since that time, very few properties have been nominated to the National Register because the management and protection of sites listed in or eligible for Register listing has been the same. Therefore, sites that are listed on the National Register receive no additional protection. Draft RMP/EIS Table 2-6, Cultural Resource Decisions, outlines by alternative which areas would receive priority for Section 110 inventories. Proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the Field Offices.	
Jerry Spangler	Colorado Plateau Archaeological Alliance	General concerns include the failure of the agency to adequately consider the indirect and cumulative effects of various activities on the integrity of historic properties.	The BLM analyzed cumulative impacts in Chapter 4 and presented a reasonable estimate of what may happen to cultural resources as a result of trends in management direction, oil and gas development, increased recreational use of public lands and the protection or lack thereof afforded by the various alternatives. While these impacts are impossible to quantify, the Draft RMP/EIS presents what the BLM considers to be a realistic and qualitative forecast of the general types of impacts that may be expected from various uses. This forecast is comparative; for example, these kinds of impacts would increase or decrease more under one alternative than they would under another. The analysis is based in large part on existing legislation, regulation and policy that require inventory and mitigation on all federal undertakings. The BLM acknowledges that illegal activities such as vandalism and looting may increase as is pointed out in the analysis, but these illegal actions are outside the proposed action and will have to be addressed through law enforcement at the implementation level.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	Among the more specific concerns identified in the Draft EIS include the absence of a clearly stated intent to initiate Section 106 compliance prior to the designation of ORV routes and open play areas;	All the OHV Play Areas identified in the Proposed Plan have had a cultural clearance performed. There would be no impacts to cultural resources in these areas. The BLM will adhere to its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
			require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available.	
Jerry Spangler	Colorado Plateau Archaeological Alliance	Among the more specific concerns identified in the Draft EIS include the failure of the BLM to adequately recognize that Areas of Potential Effect are much greater than the immediate area subjected to direct surface disturbance.	The Area of Potential Effect for any project is determined in consultation with the appropriate SHPO/THPO in accordance with 36 CFR 800.4(a)(1). This will occur upon initiation of the Section 106 consultation process for this RMP.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	Among the more specific concerns identified in the Draft EIS include the absence of a clearly defined public education and law enforcement strategy to promote proper behavior on and around archaeological sites that are adversely impacted by competing uses of public lands.	There has been a program of public education in the Richfield Field Office for years, and it has met with some limited success in increasing awareness of general historic preservation goals. The Richfield Field Office has been heavily involved in Utah Prehistory Week and will continue to do so. Beyond that, no further public education effort is proposed other than responding to requests for presentations and involvement with organizations such as the Utah Statewide Archaeological Society, the Utah Rock Art Research Association, etc. The only other proposals for public education and site interpretation are outlined in the Draft RMP/EIS in Table 2-6, Cultural Resource Decisions, and are site type-specific. Any site types listed here that are proposed to be allocated to public use are then discussed generally in Chapter 4 as requiring further public education.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	The Draft EIS is fundamentally flawed in that previous archaeological surveys collectively constitute an inadequate and statistically invalid sample, and hence the management alternatives are based on incomplete and inadequate data related to the nature, diversity and distribution of cultural resources. As stated in Section 3.3.5 Cultural Resources, BLM lands within the RFO have benefited from previous Section 106 compliance activities associated with natural resource extraction that resulted in a series of Class III investigations that identified "several thousand cultural properties." However, only about 5 percent of the RFO has been subjected to archaeological inventory.	The baseline cultural resource data that we used for the RMP is the best available information at the present time and constitutes BLM's present knowledge of the current situation, in accordance with FLPMA. Since the Section 106 and 110 inventories that have been done make up all of the cultural resource information that presently exists here, that is what forms the basis for the RMP discussion. Any surface disturbing activities based on future proposals would require compliance with Section 106 and site specific NEPA documentation.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	We recommend the Draft EIS be revised to include a commitment to a meaningful and statistically valid inventory of representative lands within the RFO whereby the diversity, distribution and density of cultural resources can be properly considered in future land management decisions.	With current funding and personnel restraints, all federal agencies have to sort their mandates and project schedules according to legislative and budget priorities. While the kind of commitment the commentor asks for would benefit a given program, public land managers need to balance a variety of resources and uses when making budget considerations. Budget considerations are not a land use planning decision and are therefore outside the scope of this RMP.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	We recommend the Draft EIS be revised to reflect the RFO intent to prioritize Class II and Class III cultural inventories that will ameliorate current data gaps through examination of geographic, environmental and ecological ranges that remain unexamined.	Table 2-6, Cultural Resource Decisions, in the Draft RMP/EIS outlines by alternative which areas would receive priority for Section 110 inventories. These inventories focus on areas that are susceptible to impacts and/or contain high interest cultural resources that have not been inventoried.	Cultural Resources
Jerry Spangler	Colorado	We recommend Section 3.3.5 be revised to reflect detailed data. The	By national agreement, individual states maintain electronic cultural databases	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Plateau Archaeological Alliance	casual reference to "several thousand sites" identified in the RFO should be replaced with actual numbers of documented sites. Furthermore, the section on site types would benefit greatly from more detailed statistical data as to the nature and distribution of documented sites within the identified categories. These data are easily available through the IMACS database and are standard on other BLM Draft EIS documents.	that include cultural information collected by BLM. The Richfield Field Office has provided information to the Utah Division of State History for future incorporation into the state-wide IMACS database. The information for the Richfield Field Office is currently not available in the database.	
Jerry Spangler	Colorado Plateau Archaeological Alliance	It is recommended that the EIS be augmented to articulate the RFO commitment to its Section 110 responsibilities, including proactive Class III and Class II inventories of different ecological ranges (see discussion above), areas impacted by increased recreational activities and areas with special management designation.	Table 2-6, Cultural Resource Decisions, in the Draft RMP/EIS outlines by alternative which areas would receive priority for Section 110 inventories. These inventories focus on areas that are susceptible to impacts and/or contain high interest cultural resources that have not been inventoried.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	It is recommended that the EIS should explicitly recognize that proactive cultural resource work is a critical need accentuated by increased ORV use. The level of proactive cultural resource program work to be performed annually should be specifically stated in the RMP, and funding for such work should be prioritized within the RFO budget.	With current funding and personnel restraints, all federal agencies have to sort their mandates and project schedules according to legislative and budget priorities. While the kind of commitment the commentor asks for would benefit a given program, public land managers need to balance a variety of resources and uses when making budget considerations. Budget considerations are not a land use planning decision and are therefore outside the scope of this RMP.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	Funding shortfalls to address issues like site monitoring and protection can be ameliorated through partnerships with advocacy groups, site stewards, nonprofit organizations and research entities through the aggressive use of Challenge Cost Share grants and other non-BLM funding sources. The EIS should explicitly state the willingness of the BLM to engage nongovernmental partners in its proactive cultural resource management initiatives.	The BLM is committed to promoting collaborative partnerships to assist in meeting management goals and objectives for cultural resources.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	Section 3.3.5.3 Cultural History Overview places the beginning of the Archaic Period at 5500 B.C. This temporal delineation may be valid for the Northwestern Plains (cf Frison 1991), but it is not valid for any area within the RFO. The eastern portion of the RFO lies within the northern Colorado Plateau as traditionally defined and where scholars generally agree the Archaic Period began at about 8000 B.C. (cf Agenbroad 1990; Schroedl 1991; see also Jennings 1980 specific to Cowboy Cave in the RFO). The western portion of the RFO lies on the eastern periphery of the Great Basin, where Madsen (1982) has placed the beginning of the Archaic Period at 7000 B.C. An Archaic temporal range of 8000 B.C. to 600 AD. is generally accepted for most of the RFO.	The Proposed RMP/Final EIS has been revised to clarify the discrepancies	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	Section 3.3.5.3 Cultural History Overview places the beginning of the Formative at AD. 700. Most Utah prehistory scholars agree that behavioral characteristics commonly attributed to the Formative were in place centuries prior to that time (e.g., maize agriculture, bow-and-arrow technology, residential and storage structures indicative of greater sedentism). However, the delineation of a "Formative Period" is typically reserved for that time after the introduction of ceramic technologies that enhanced the effectiveness of food processing and storage and resulted	The Proposed RMP/Final EIS has been revised to clarify the discrepancies	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		in population aggregation (see Spangler 2001 for an overview of these data). Scholars typically place the introduction of plain grayware ceramics north of the Colorado River, including all of the RFO, at about AD. 600. By consequence, AD. 600 is the beginning of the Formative as typically defined for most of Utah.		
Jerry Spangler	Colorado Plateau Archaeological Alliance	Likewise, the same narrative states that evidence of agriculture exists in southern and southeastern Utah dated to about 1000 B.C. (DEIS 3-21). No such early maize radiocarbon dates have yet been reported from anywhere in Utah. The earliest maize dates north of the Colorado River were obtained from samples in the Escalante River (B.C. 266 calibrated midpoint) and the Elsinore Burial (B.C. 195 calibrated midpoint). These early dates suggest the possibility of nascent maize horticulture in the RFO as early as 200 B.C., although the vast majority of data suggest an introduction of maize horticulture sometime after A.D. 200 (see Spangler 2001 for an overview of early maize dates).	The Proposed RMP/Final EIS has been revised to clarify the discrepancies	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	Section 3.3.5.1.1 states that "Rock art has not been attributed to specific human groups with any degree of assurance, but it is believed that rock art within the RFO represents groups living from before 9000 B.C. to the present" (DEIS 3-19). Although attribution of prehistoric rock art to "specific human groups" is impossible, rock art is commonly attributed to cultural entities with a shared ideology through time and space. Hence, rock art sites can with some confidence be assigned to Archaic, Fremont, Anasazi, Athapaskan or other cultural entities, many of which have modern descendants who assign ceremonial significance to the images.	The Proposed RMP/Final EIS has been revised to clarify the discrepancies	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	Also problematic is that statement that rock art can be attributed to groups living before 9000 B.C. Although this is possible, there are no data to support such an early date. The oldest rock art style north of the Colorado River is Glen Canyon Style 5, which has a striking similarity to split-twig figurines dated to about 2000 B.C. Turner extended the beginning of this style of rock art in Glen Canyon to 2,000 to 6,000 B.C., suggesting these images constituted " ... the best candidates for the earliest rock art in the New World" (1963:7). There is no evidence in the RFO or elsewhere in North America of rock art images dating to 9000 B.C.	The Proposed RMP/Final EIS has been revised to clarify the discrepancies.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	"Cist" is listed in the catalog of site types as small structures usually built for storage purposes. It states "They are slab lined or coursed masonry, generally about one meter in diameter. They are usually semi-subterranean but can occur on the surface, freestanding or attached to a cliff face or ledge" (DEIS 3-20). Surface masonry structures for storage are typically labeled as granaries, whereas subsurface structures are typically labeled as cists. The term as used in the Draft EIS commingles standard definitions for cists and granaries (see IMACS handbook).	The Proposed RMP/Final EIS has been revised to clarify the discrepancies.	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Hence, the term cist in the Draft EIS should be replaced with "storage" or "storage facilities" to encompass all types of localities where items are stored for future use. It should also be noted that storage facilities were commonly utilized as burial chambers.		
Jerry Spangler	Colorado Plateau Archaeological Alliance	The Draft EIS utterly fails to recognize the agency's mandates under Section 110 of NHPA to identify, evaluate and nominate, instead implying in Section 1.5.1.2.1 that "proposal" of cultural sites to the National Register is an administrative action that does "not require a planning decision to implement" (DEIS 1-9). CPAA strongly disagrees with this conclusion. We believe the nomination of archaeological sites or archaeological districts to the National Register is a fundamental component of land use planning. The BLM should aggressively pursue the nomination to the National Register of historic properties under its jurisdiction, including archaeological sites and archaeological districts of local, regional and national significance. These efforts should explicitly reflect the agency's commitment to Section 110 compliance regardless of which alternative is chosen.	Up until 1980, Section 106 of the NHPA required agencies to consider the effects of their undertakings only on properties listed on the National Register of Historic Places and there were efforts to nominate sites to the Register so that they could receive the protection afforded by such a listing. However, the situation changed in 1980 when Section 106 was amended to require agencies to consider an undertaking's effects on properties included in or eligible for inclusion in the National Register. Since that time, very few properties have been nominated to the National Register because the management and protection of sites listed in or eligible for Register listing has been the same. According to the BLM's planning handbook (BLM-H-1601-1), nominating cultural sites to the National Register of Historic Places is not a land use planning decision and is therefore outside the scope of this EIS.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	The BLM should aggressively seek public input regarding which sites should be prioritized for nomination. This could include discussions with interested Native American tribes, the Utah Professional Archaeological Council, local and statewide historical societies, and historic preservation advocacy organizations such as the National Trust for Historic Preservation.	According to the BLM's planning handbook (BLM-H-1601-1), nominating cultural sites to the National Register of Historic Places is not a land use planning decision and is therefore outside the scope of this EIS. According to the national Programmatic Agreement and individual state BLM/SHPO protocol agreements, the BLM invites SHPO, public, governmental and Native American participation in all planning efforts.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	The Draft EIS does not explicitly state that Section 106 compliance (e.g., Class III inventories) will be required prior to designation of routes currently in use. As such, the Travel Plan is fundamentally flawed on two important points: (1) The failure of the BLM to conduct adequate analysis in the past related to ORV impacts along routes currently being used by motorized vehicles was and still remains an abrogation of agency's Section 106 responsibilities, and the failure of the agency to recognize or correct this deficiency in the new Travel Plan appears to validate and perpetuate the agency's failure to comply with Section 106 requirements in the past; and (2) the failure to require Class III inventories along routes prior to designation suggests the agency official has already made a determination, as per 36 CFR 800.3(a), that travel route designations in such instances are not an undertaking as defined in 36 CFR 800. 16(y).	All the OHV Play Areas identified in the Proposed Plan have had a cultural clearance performed. There would be no impacts to cultural resources in these areas. The BLM will adhere to its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or	Cultural Resources

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			similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available.	
Jerry Spangler	Colorado Plateau Archaeological Alliance	Damage to or destruction of archaeological sites is most prevalent along existing routes, usually within 200 meters of an existing route (cf. Spangler, Arnold and Boomgarden 2006). Hence, the limitation of ORV travel to existing or designated routes may not significantly reduce impacts to cultural resources adjacent to those routes. These data stand in contrast to statements in the Draft EIS that damage would be limited to the immediate vicinity of the designated route (cf. Alternative C DEIS 4-76). There seems to be inherent assumptions throughout the DEIS that (1) all ORVs will remain on the designated trail; and (2) that designated ORV trails will not facilitate pedestrian access to archaeological sites that could be subjected to illegal looting, vandalism, improper surface collection of artifacts and increased erosion and structural degradation caused by public visitation. It must be considered probable that such damage has already occurred along existing routes, and that damage to known and unknown sites will continue in the future.	The Draft RMP/EIS acknowledges that the illegal activities, such as vandalism and looting, may be impacted by changes in access, as is specifically identified in section 4.3.5. The Draft RMP/EIS does not include a detailed analysis of illegal activities. Enforcing the RMP decisions is an implementation-level action. Concerning the impacts from OHV leaving routes that are identified in an alternative, the Draft RMP/EIS analyzes the effects of the proposed actions, which does not include public land users driving off identified routes in areas that where OHV use is limited to identified routes.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	We recommend all ORV travel should be restricted to designated routes and that the designation of all ORV routes must be based on full Section 106 reviews of all direct and indirect adverse effects resulting from enhanced access to backcountry areas and increased use oftrave1 corridors resulting from formal designations.	All the OHV Play Areas identified in the Proposed Plan have had a cultural clearance performed. There would be no impacts to cultural resources in these areas. The BLM will adhere to its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available.	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
Jerry Spangler	Colorado Plateau Archaeological Alliance	We recommend the Class III inventory and site evaluations be conducted along existing and designated routes, and these inventories be expanded to include areas of indirect impacts, with specific focus on identifying cultural resources in adjacent topographic settings that could be impacted by increased vehicular access. This should include, but not be limited to, the identification of rockshelters with potentially intact cultural deposits that are visible from a designated route regardless of distance, and to all other localities within at least 200 meters of an existing route.	All the OHV Play Areas identified in the Proposed Plan have had a cultural clearance performed. There would be no impacts to cultural resources in these areas. The Area of Potential Effect for any project is determined in consultation with the appropriate SHPO/THPO in accordance with 36 CFR 800.4(a)(1). This will occur upon initiation of the Section 106 consultation process for this RMP. The BLM will adhere to its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	We recommend that it camping is allowed along the designated routes, all areas within the corridor where camping, parking and staging should be subjected to Class III inventories, as well as an APE of 200 meters beyond the maximum point allowed for such activities.	The Area of Potential Effect for any project is determined in consultation with the appropriate SHPO/THPO in accordance with 36 CFR 800.4(a)(1). This will occur upon initiation of the Section 106 consultation process for this RMP.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	Historically, site monitoring has consisted of on-site inspections with minimal field notes and substantial reliance on institutional memory as to what the original site condition was. It is recommended that the RMP require that any site monitoring program include a uniform statewide database whereby impacts to cultural resources can be accurately and consistently measured and documented, and site conditions compared and contrasted over time in a manner that will facilitate more informed management decisions.	The potential decisions in the Draft RMP/EIS only apply to the Richfield Field Office. Establishing a uniform statewide database in this RMP is not identified in the BLM's 1601-1 handbook as a land use planning level decision and is therefore outside of the scope of this NEPA document. Any site monitoring will include the resources and methods available to BLM.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	We concur that BLM should encourage "Leave No Trace" and "Tread Lightly" (DEIS 2-44), but we believe such efforts should also include public outreach efforts to educate ORV users about the fragile nature of cultural resources, the laws protecting those resources, "best practices"	The public outreach, education, and programs identified by the commentor currently include this information, and they are updated continually as new information becomes available. Specifically stating the commentor's suggested language neither increases the BLM's ability to perform such outreach, nor	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		expected of ORV users in archaeologically sensitive areas, and proper procedures to follow when encountering cultural resources or when observing improper or illegal behavior. The BLM should also implement a mechanism whereby visitors can report ORV damage and violation of rules to BLM personnel. Various methods of reporting improper activities (e.g., phone numbers, Internet) should be widely advertised to facilitate maximum public participation.	precludes the BLM from actively pursuing such outreach measures. According to the BLM's planning handbook (BLM-H-1601-1), this type of prioritization is not a land use plan decision, and is outside the scope of this NEPA document.	
Jerry Spangler	Colorado Plateau Archaeological Alliance	Route or area closures are an appropriate and proven management tool to mitigate the adverse impacts of ORVs on and around archaeological sites. As demonstrated in Range Creek in eastern Utah, these closures are most effective when accompanied by an administrative commitment to maintain a visible law enforcement presence (Spangler, Arnold and Boomgarden 2006). The plan should clearly specify such a management strategy.	During the development of the land use plan, cultural resource conflicts were considered during the route identification process. Specifying a law enforcement presence for closed routes is outside the scope of this planning document.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	The EIS should clearly state that Class III inventories, site assessments and site mitigations will be completed prior to the designation of ORV routes, including existing routes and open ORV areas, and that cultural resource protection will be a fundamental goal of any transportation planning.	All the OHV Play Areas identified in the Proposed Plan have had a cultural clearance performed. There would be no impacts to cultural resources in these areas. The BLM will adhere to its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available.	Cultural Resources
Jerry Spangler	Colorado Plateau Archaeological Alliance	In the event the BLM leases open play areas near communities, the RMP should state that lease stipulations will include periodic monitoring requirements by qualified archaeologists, as well as provisions to allow the BLM to terminate the lease to protect cultural resources from additional degradation (e.g., closing the area to ORVs) if needed to	As stated in the Draft RMP/EIS in Table 2-17, R&PP lease "requests would be considered on a case-by-case basis subject to an environmental analysis." This would include compliance with Section 106 of the National Historic Preservation Act. This RMP contains multiple statements throughout the document that everything proposed in these alternatives will be done according to law,	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		protect those resources.	regulation and policy.	
Jesse Black Jesse_W_Black @raytheon.com		Vehicles should be allowed to access campsites via existing spur roads within 300 feet of a designated route.	The management suggested within the comment was included within the range of alternatives. Many routes which provide access to campsites have been identified and would be designated routes. Appendix 9 provides criteria to consider the addition of designated routes in future if necessary to better address resources and resource use conflicts.	Recreation
Jevin Croteau jevin.croteau@ encana.com		In the Richfield DRMP/EIS, the BLM has failed to adequately consider reasonable access to federal and private minerals and to consider the effects its proposed management strategy will have on current and future oil and gas exploration and development activities, and on the rural economy.	The Reasonably Foreseeable Development (RFD) scenario (prepared by the BLM, see appendix 12 of the RFO DRMP/DEIS) foresees a certain level of development in the study area as a whole and provides the average number of wells expected to be drilled in four areas. Constraints in the various alternatives could impact exactly where development occurs. However, nearly 80% of the oil and gas wells projected in the RFD are located along the west side of the planning area where public lands are either open to leasing under standard terms or open to leasing with controlled surface use or timing stipulations, as stated in the RMP chapter 4 Alternative N Leasable Minerals – Oil and Gas section. Utilizing the RFD and above stated assumptions, the socioeconomic impacts of the oil and gas development to the local communities are discussed in section 4.6.1. In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Alternative A of the Draft RMP/EIS favors mineral development over protection of resources. Alternative C favors the protection of resources over the extraction of mineral development. Alternative D is the same as Alternative C except it includes management of lands with wilderness characteristics to preserve those characteristics. Alternative B is designed to be a balance between mineral development and protection of resources. Table 2.1 in the Richfield DRMP/DEIS provides in comparative form the management actions associated with each alternative.	Socioeconomics
Jevin Croteau jevin.croteau@		Large portions of the Covenant Field, the portion of the planning area with the highest potential for oil and gas, would be designated as Class	BLM currently manages some of the Covenant Field as VRM Class II. The Richfield Field Office has developed and implemented best maangement	Visual Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
encana.com		II. This restriction on the Covenant Field should be removed to ensure this vital energy resource is accessible to Utah and the nation.	practices (BMPs) for visual impacts associated with oil and gas development.	
Joan Beck fourby@citlink.net	Bullhead 4 Wheelers, Inc. Walapai 4 Wheelers, Inc.	This number, in our opinion, is unrealistic and makes group outings such as family/club picnics, trail rides or other non-profit events impossible. In addition, an SRP should not be required to recreate in an area for two or more hours, not only would this be impossible to enforce, it just isn't practical.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Joan Beck fourby@citlink.net	Bullhead 4 Wheelers, Inc. Walapai 4 Wheelers, Inc.	BLM should recognize the RS2477 road claims that are part of the Sanpete, Sevier, Piute, Garfield and Wayne County Transportation Plans. The validity of these claims should be determined before a final decision is made in this RMP.	As specified in the Draft RMP EIS page 1-10 addressing RS 2477 assertions is 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.	Transportation
Joan Beck fourby@citlink.net	Bullhead 4 Wheelers, Inc. Walapai 4 Wheelers, Inc.	We note that the BLM has, according to the U4WDA "left a plethora of significant roads off of their alternatives—including Alternative B." We strongly request that these significant roads/ways/trails and routes be added to Alternative B, including, as recommended by the U4WDA, the following: Angel Cove Route Hanksville 100k Connector Roads @ T27S-R3W Sevier River Central 100k Connector Route @ T27S-R3W Sevier River South 100k Connector Road East of Bicknell Fremont George 100k Happy Canyon Route Dirty Devil 100k Miners Park Spur Routes Sevier River South 100k Muddy Creek Route @ T27S-R10E Hanksville 100k Sams Mesa Routes Dirty Devil 100k Spur Route @ T31S-R15E Dirty Devil 100k Spur Route @ T27S-R8E Hanksville 100k Wood Bench Spur Route Hanksville 100k	Data available for routes on Sam's Mesa was analyzed and designated as open or open to 50" or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed within Happy Canyon for consistency with other resource decisions of the RMP. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the preferred alternative. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns. T.27 S., R.8 E., spur route Comment lacked specificity to identify Wood Bench Spur Route. Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) were reassessed. WYNC0017 and 0018 were designated for Administrative Use Only due to resource concerns. Insufficient data was available on route #WYNC0017A. If there is a purpose and need for this route in the future, inventory data would need to be gathered and analyzed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the preferred alternative (PTSR0201).	Travel Management – OHV Route Identification
Joel A Webster jwebster@trcp.org	Theodore Roosevelt Conservation Partnership	We believe that the timing of the release of the Richfield RMP DEIS in conjunction with 5 other Utah BLM RMP revisions has not provided the public with adequate opportunity to be involved with the management of the Richfield field office area. Given the comprehensive nature of planning documents and the number of planning documents that have	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-	Process and Procedures

Commentor	Affiliation	Comment	Comment Summary Response	Category
		been released to the public by the Utah BLM over the last 5 months, it is unrealistic to expect that the average citizen has had the time to take a thorough look at the different RMPs and provide meaningful comments. Therefore, we recommend that the Richfieldfield office extend the comment period for the Richfield RMP DEIS to provide the public with adequate opportunity to express their concerns and recommendations.	day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held six open houses around the State to facilitate review of the Richfield DRMP/DEIS.	
Joel A Webster jwebster@trcp.org	Theodore Roosevelt Conservation Partnership	Given the nature of leasing and the need for upfront comprehensive planning, it needs to be known during the RMP process how the Richfield Field Office will establish plans for mitigation, including detailed fish and wildlife monitoring and the use of adaptive management strategies to prevent, minimize or mitigate impacts of oil and/or gas exploration and development for future parcels offered for leasing. It needs to be known what the BLM will do to ensure that areas that are developed get restored so that they can be hunted again during the lifetime of Utahhunters and anglers. Prior to leasing, it needs to be known how long these potential energy developments will take to be implemented, recovered, and mitigated. The Richfield Field Office also needs to know how the amount of money suggested for mitigation will relate to the revenues that will come from the developed area, and how it relates to the habitat base and to the biological needs of fish and wildlife populations being affected. Under the current practice of leasing prior to planning, the Richfield Field Office is sacrificing their ability to adequately plan energy development and accomplish the mitigation tactics of avoiding, minimizing, and reducing impacts on the public's fish and wildlife habitat	BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. As described in Appendix 11 of the Draft RMP/EIS timing limitation stipulations on oil and gas leasing would protect hunting values.	Recreation
Joel A Webster jwebster@trcp.org	Theodore Roosevelt Conservation Partnership	Hunting and Fishing Opportunity The Richfield Field Office manages federal public land that holds some of Utah's finest hunting and fishing. Given the long-term nature of energy development, the BLM should include a plan in the FEIS for compensating hunters for the loss of big game that might occur as a result of energy development. The Richfield Field Office must identify the hunting values of the areas being considered for energy development and then determine how subsequent development will impact the uses our members and other sportsmen make of our federal public lands during oil and/or gas exploration and development on these lands. Because energy development might keep our members from being able to hunt for the rest of their lives in areas managed by the Richfield Field Office, it needs to be determined what the Richfield Field Office will do to provide our members and UT sportsmen with alternative locations where they can continue hunting during the appropriate lease-area determination process	BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. As described in Appendix 11 of the Draft RMP/EIS timing limitation stipulations on oil and gas leasing would protect hunting values.	Recreation
Joel A Webster jwebster@trcp.	Theodore Roosevelt	Comply with Executive Order 13443 and Instructional Memo 2008-006 We believe that the RMP is not adhering to Executive Order 13443,	The Draft RMP/EIS includes common to all alternatives in Table 2-10 that faciltate hunting opportunities and the management of game species habitat on	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
org	Conservation Partnership	issued on Aug. 16, 2007 and Instructional Memorandum No. 2008-006 issued Nov. 12, 2007. Available at: http://www.blm.gov/nhp/efoia/wo/fy08/IM2008-006.htm) According to Bureau of Land Management (BLM) Instruction Memorandum No. 2008-006, Implementation of Executive Order 13443, Facilitation of Hunting Heritage and Wildlife Conservation, the Bureau of Land Management directed State Directors to: Evaluate trends in hunting participation and implement actions that expand and enhance hunting opportunities for the public; Establish short and long term goals to conserve wildlife and manage wildlife habitats to ensure healthy and productive populations of game animals in a manner that respects state management authority over wildlife resources and private property rights; Seek the advice of state fish and wildlife agencies, and, as appropriate, consult with the Sporting Conservation Council (SCC) in respect to Federal activities to recognize and promote the economic and recreational values of hunting and wildlife conservation. The Order also directs the Chairman of the Council on Environmental Quality, in coordination with federal agencies and in consultation with the SCC, state fish and wildlife agencies and the public, to convene, within one year after this Executive Order is signed, and periodically thereafter, a White House Conference on North American Wildlife Policy to facilitate the exchange of information and advice needed to fulfill the purposes of the Order. In addition, the Order calls for a comprehensive 10-year Recreational Hunting and Wildlife Conservation Plan that will set forth an agenda for implementing the actions called for in the Order.[1] Presidential E.O. 13443 and BLM Instruction Memorandum No. 2008-006 further requires the BLM to take the following actions: To carry out the Order, the BLM must collaborate with a diverse cross-section of state, local and tribal governments, scientists, landowners, individual sportsmen, non-profit organizations and other interested parties (Non-Federal Partners). To facilitate collaboration, it is important that we identify the near-term and long-term actions currently ongoing or under consideration throughout the agency. This will result in a coordinated approach to implementation, while also giving due consideration to the missions, policies and authorities unique to each agency. [2] Furthermore, according to Executive Order 13443, which states that the United States Department of Agriculture, and the Department of Interior shall: ·Evaluate the effect of agency actions on trends in hunting participations and, where appropriate to address declining trends, implement actions that expand and enhance hunting opportunities for the public; · Consider the economic and recreational values of hunting in agency actions, as appropriate; · Manage wildlife and wildlife habitats on public lands in a manner that expands and enhances hunting opportunities, including through the use of hunting in	public lands. These management actions include coordinating with the Utah Division of Wildlife Resources to manage big game habitat values.	

Commentor	Affiliation	Comment	Comment Summary Response	Category
		wildlife management planning; · Work collaboratively with State Governments to manage and conserve game species and their habitats in a manner that respect private property rights and State management authority over wildlife resources; · Ensure that agency plans and actions consider programs and recommendations of comprehensive planning efforts such as the State Wildlife Action Plans, the North American Waterfowl Management Plan and other range-wide management plans for big game and upland birds. [3] To TRCP's knowledge, these actions, as outlined by the director of the BLM and by President George W. Bush, have not been implemented in a formal manner, and therefore, the Richfield Field Office should adhere to the direction that the President and the director of the BLM to implement the instructions of this order and instructional memo prior to the issuance of the Richfield RMP FEIS.		
Joel A Webster jwebster@trcp.org	Theodore Roosevelt Conservation Partnership	Commitment to UT Division of Wildlife Resource's Management Objectives The Richfield Field Office manages federal public land identified by the UT Division of Wildlife Resources as having crucial fish and wildlife values. Some of these areas are nationally renowned as world-class destinations including the HenryMountains, one of the most sought-after mule deer hunting units in the nation. Also being considered is the future management of pronghorn and sage grouse habitat, plus the Thousand Lake mule deer limited hunting units, the Henry Mountains bison limited hunting unit and the Central Mountains Manti, Central Mountains Nebo, Fillmore Pahvant, Monroe, Plateau Boulder, Plateau Fishlake and Plateau Thousand Lake elk limited hunting units, extensive desert bighorn sheep crucial habitats, and the blue ribbon East Fork Sevier River fishery.The leasing and development of areas with high fish and wildlife values without first conducting the necessary upfront planning may cause a reduction in hunter opportunity and hunting quality, which could contribute to a reduction in hunter participation numbers and declining revenue to the UT DWR. The BLM fails to show how it will work to maintain wildlife objectives set by the UT Division of Wildlife Resources (UT DWR). Any determination of areas available for leasing and the appropriate development of those leases should be done with careful consideration of wildlife management objectives set by the UT DWR. The BLM also should consider how energy development will impact long-term hunter recruitment, license sales, and corresponding sportsmen-created revenue to the UT DWR and local communities. All important habitat areas should not be opened for leasing until the Richfield Field Office develops a plan for development that uses science-based measurable benchmarks to allow the development to take place in a way that will not considerably impact UT DWR's ability to meet management objectives for fish and wildlife	The Draft RMP-EIS includes management actions under Fish and Wildlife Common to All Alternatives (Table 2-10, page 2-26) that support UDWR management plans and objectives. Impacts to wildlife habitat from oil and gas leasing management actions are discussed generally in Section 4.3.9, page 4-164. Utah BLM will conduct a site-specific review of parcel-specific issues via the BLM's DNA process. This would ensure all aspects of the environment were accounted for and ensure each was adequately addressed or analyzed in the LUP. Impacts to hunting opportunites from proposed management actions is discussed generally in Impacts to Recreation (Section 4.4.3).	Wildlife and Fish

Commentor	Affiliation	Comment	Comment Summary Response	Category
		and provide public opportunities for hunting and fishing. We believe such planning should incorporate a specific conservation strategy in concert with UT DWR on how to maintain current big game and upland game-bird population objectives in the areas that will become available for leasing.		
Joel A Webster jwebster@trcp.org	Theodore Roosevelt Conservation Partnership	Use the Most Recent Peer-Reviewed Scientific Studies Under CEQ NEPA regulations, BLM must make use of all the best available scientific information to assess the effects of land management actions, including cumulative effects from existing, proposed, or foreseeable development projects in the resource management area. Referenced below are peer-reviewed scientific studies on the impacts on sage grouse, elk, and mule deer from vehicle traffic, roads, and oil and gas development. The information from these studies should be incorporated into the FEIS. Big Game: Rowland, M. M., M. J. Wisdom, B. K. Johnson, and M. A. Penninger 2005. Effects of roads on elk: Implications for management in forested ecosystems. March 20, 2004. Transactions of the North American Wildlife and Natural Resources Conference 69. Available at: http://www.fs.fed.us/pnw/lagrande/starkey_na/PDFs_Preprints/ms-04_Rowland.pdf Sawyer, H., R. Nielson, F. Lindzey, and L. McDonald. 2006. Winter habitat selection of mule deer before and during development of a natural gas field. Journal of Wildlife Management 70:396-403. Available at: http://www.bioone.org/perlserv/?request=get-abstract&doi=10.2193%2F0022-541X(2006)70%5B396%3AWHSOMD% 5D2.0.CO%3B2 Sawyer, H., R. Nielson, D. Strickland, and L. McDonald. 2005. Annual Report, Sublette Mule Deer Study (Phase II): Long-term monitoring plan to assess potential impacts of energy development on mule deer in the Pinedale Anticline Project Area. Western Ecosystems Technology, Inc. Cheyenne, WY. Available at: http://www.west-inc.com/reports/PAPA_2005_report_med.pdf Sawyer, H. and F. Lindzey. 2001. Sublette Mule Deer Study. WyomingCooperative Fish and Wildlife Research Unit, Universityof Wyoming, Laramie. 51 pp. Available at: http://www.uppergreen.org/library/docs/Muledeerstudy1.pdf Wisdom, M. J., N. J. Cimon, B. K. Johnson, E. O. Garton, and J. W. Thomas 2005. Spatial partitioning by mule deer and elk in relation to traffic. March 20, 2004. Transactions of the North American Wildlife and Natural Resources Conference 69. Available at: http://www.fs.fed.us/pnw/lagrande/starkey_na/PDFs_Preprints/ms-05_Wisdom.pdf Sage Grouse: Holloran, Matt J. 2005. Greater sage-grouse (Centrocercus urophaisianus) population response to natural gas field development in western Wyoming. PhD Dissertation, Univ.of Wyoming. Laramie, WY. 211 pp. Available at: http://www.sagebrushsea.org/ In Press. Walker, B. L., D. E. Naugle, and	When analyzing the effects of proposed land management actions on resources, BLM staff use a variety of information sources including peer-reviewed literature, government and non-government organizations research and reports, field office inventory and monitoring data, and field observations. By using the BLM's library in Denver, staff have access to the most recent peer-reviewed literature. There is a great amount of data available that presents the best scientific information concerning the impacts of oil and gas development on wildlife. Although the BLM may not have used the specific article listed by the commentor in development of the DRMP/DEIS, the BLM appreciates the commentor supplying the recommended articles. The BLM will review them and use them as needed in the development of oil and gas NEPA analyses.	Wildlife and Fish

Commentor	Affiliation	Comment	Comment Summary Response	Category
		K. E. Doherty. Greater sage-grouse population response to energy development and habitat loss. Journal of Wildlife Management. Available at: http://www.forestry.umt.edu/personnel/faculty/dnaugle/pdfs/Sage-grouse%20Lek%20Analysis_JWM(in_press).pdf In Press. Doherty, K. E., D. E. Naugle, B. L. Walker, and J.M. Graham. Greater sage- grouse winter habitat selection and energy development. Journal of Wildlife Management. Available at: http://www.forestry.umt.edu/personnel/faculty/dnaugle/pdfs/Sagegrouse %20winter%20habitat%20and%20ene rgy_JWM(in_press).pdf		
Joel Tuhy	The Nature Conservancy	The DRMP table of non-listed SSS [Table 3-16] is accurate but appears to lack several species which UTNHP data show to be present within the RPA (though not necessarily on BLM-administered lands). These species potentially to be included are as follows: MOLLUSKS: Common Name: Southern Bonneville Springsnail; Scientific Name: Pyrgulopsis transversa; Utah DWR Status or Utah BLM Sensitive Species Status: Species of Special Concern; Common Name: Ninemile Springsnail; Scientific Name: Pyrgulopsis nonaria; Utah DWR Status or Utah BLM Sensitive Species Status: Species of Special Concern; Common Name: Otter Creek Springsnail; Scientific Name: Pyrgulopsis fusca; Utah DWR Status or Utah BLM Sensitive Species Status: Species of Special Concern; Common Name: Black Canyon Springsnail; Scientific Name: Pyrgulopsis plicata; Utah DWR Status or Utah BLM Sensitive Species Status: Species of Special Concern; MAMMALS: Common Name: Kit Fox; Vulpes macrotis; Utah DWR Status or Utah BLM Sensitive Species Status: Species of Special Concern; PLANTS: Common Name: Creutzfeldt cryptanth; Scientific Name: Cryptantha creutzfeldtii; Utah DWR Status or Utah BLM Sensitive Species Status: Sensitive. In addition, UTNHP data show occurrences of two lizards in the southeastern part of the RPA that are Species of Special Concern: the common chuckwalla (Sauromalus ater) and desert night lizard (Xantusia vigilis). These occurrence records are relatively old, but inclusion of these two lizards on the SSS list may be warranted if they are still believed to be present.	BLM uses the current UDWR sensitive species list, and the Final RMP-EIS will be updated to include the most recent list.	Special Status Species
Joel Webster	Theodore Roosevelt Conservation Partnership	Therefore, we recommend that the Richfield field office extend the comment period for the Richfield RMP DEIS to provide the public with adequate opportunity to express their concerns and recommendations.	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals	Process and Procedures

Commentor	Affiliation	Comment	Comment Summary Response	Category
			to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held six open houses around the State to facilitate review of the Richfield DRMP/DEIS.	
Joel Webster	Theodore Roosevelt Conservation Partnership	We believe that the RMP is not adhering to Executive Order 13443,issued on Aug. 16,2007 and Instructional Memorandum No. 2008-006 issued Nov. 12,2007. (Available at: http://www.blm.gov/nhp/efoia/wo/fy08/IM2008-006.htm)	The BLM is clearly adhering to EO 13443 and WO IM #2008-006. However, this IM is not a planning level IM. It is a project level IM to evaluate and work with state, local and tribal governments, scientists, landowners, individual sportsmen, non-profit organizations and other interested parties (non-Federal partners) in the development of site specific and national projects. To facilitate collaboration, it is important that the BLM identifies the near-term and long-term actions currently ongoing or under consideration throughout the agency. This will result in a coordinated approach to implementation, while also giving due consideration to the missions, policies, and authorities unique to each agency.	Process and Procedures
Joel Webster	Theodore Roosevelt Conservation Partnership	Under CEQ NEPA regulations, BLM must make use of all the best available scientific information to assess the effects of land management actions, including cumulative effects from existing, proposed, or foreseeable development projects in the resource management area. Referenced below are peer-reviewed scientific studies on the impacts on sage grouse, elk, and mule deer from vehicle traffic, roads, and oil and gas development. The information from these studies should be incorporated into the FEIS.	When analyzing the effects of proposed land management actions on resources, BLM staff use a variety of information sources including peer-reviewed literature, government and non-government organization research and reports, field office inventory and monitoring data, and field observations. By using the BLM's library in Denver, staff have access to the most recent peer-reviewed literature. There is a great amount of data available that presents the best scientific information concerning the impacts of oil and gas development on wildlife. Although the BLM may not have used the specific article listed by the commentor in development of the DRMP/DEIS, the BLM appreciates the commentor supplying the recommended articles. The BLM will review them and use them as needed in the development of oil and gas NEPA analyses.	Process and Procedures
Joel Webster	Theodore Roosevelt Conservation Partnership	The Richfield DEIS fails to adequately address oil and gas development and how it can be conducted in a way that does not unnecessarily impact fish and wildlife and their habitats. We recommend that all areas of crucial fish and wildlife habitats available for oil and gas leasing and without NSO stipulations should have upfront planning prior to leasing to ensure that subsequent developments will be conducted responsibly.	The Draft RMP-EIS includes management actions under Fish and Wildlife Common to All Alternatives (Table 2-10, page 2-26) that support UDWR management plans and objectives. Impacts to wildlife habitat from oil and gas leasing management actions are discussed generally in Section 4.3.9, page 4-164. As leases are proposed, site-specific NEPA analysis, including impacts to fish and wildlife habitat, will be conducted.	Wildlife and Fish
Joel Webster	Theodore Roosevelt Conservation Partnership	The DEIS fails to provide a commitment to adequate fund fish and wildlife management, monitoring, and restoration for oil and gas development projects. In times of increasing pressure from energy development on our federal public lands, fish and wildlife management needs more funding, not less.	Funding is approved at the Congressional level and is outside the authority of the RMP. Oil and gas leasees are held to terms and conditions of the lease, which may include financial responsbility for wildlife monitoring and mitigation.	Wildlife and Fish
Joel Webster	Theodore Roosevelt Conservation Partnership	The BLM fails to show how it will work to maintain wildlife objectives set by the UT Division of Wildlife Resources (UT DWR). Any determination of areas available for leasing and the appropriate development of those leases should be done with careful consideration of wildlife management objectives set by the UT DWR.	The Draft RMP-EIS includes management actions under Fish and Wildlife Common to All Alternatives (Table 2-10, page 2-26) that support UDWR management plans and objectives. The specific conservation actions are specified in UDWR management plans, such as the Utah Comprehensive Wildlife Conservation Strategy (UDWR 2005c). Impacts to wildlife habitat from oil and gas leasing management actions are discussed generally in Section 4.3.9, page 4-164. As leases are proposed, site-specific NEPA analysis, including impacts to fish and wildlife habitat, will be conducted.	Wildlife and Fish
John Ashton	Utah Four	I believe that the following routes should remain open and amended to	Data available for routes on Sam's Mesa was analyzed and designated as open	Travel

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Wheel Drive Association	alternative B: Sams Mesa Routes; Happy Canyon Route; Spur Route @ T31S R15E; Connector road east of Bicknell; Muddy Creek Route @ T27S R10E; Spur route @ T27 S R8E; Wood Bench Spur Route; North Pinto Hills Route; Angel Cove Route; Connector roads @ T27S R3W; Miners Park spur routes; Connector Route @ T27S R3W	or open to 50" or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed within Happy Canyon for consistency with other resource decisions of the RMP. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the proposed plan. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns. T.27 S., R.8 E., spur route Comment lacked specificity to identify Wood Bench Spur Route. Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) were reassessed. WYNC0017 and 0018 were designated for Administrative Use Only due to resource concerns. Insufficient data was available on route #WYNC0017A. If there is a purpose and need for this route in the future, inventory data would need to be gathered and analyzed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the preferred alternative (PTSR0201).	Management – OHV Route Identification
John Hall jfhall666@yahoo.com		The public has only 90 days to review and comment on the draft plans. In addition, the BLM has, or soon will, release plans for six regions, making it exceedingly difficult to review and comment on all the plans, and the BLM has refused to extend the comment period.	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held six open houses around the State to facilitate review of the Richfield DRMP/DEIS.	Process and Procedures
John Hall jfhall666@yahoo.com		The BLM has identified 12 eligible river/stream segments for inclusion in the Wild and Scenic River System. However, the BLM's preferred alternative recommends only two river segments as suitable for Wild & Scenic protection.	The No Action Alternative includes all river segments that are considered eligible for Wild and Scenic River status; however, no suitability decisions (designating WSR status) have been made. Although all eligible segments are considered in the No Action Alternative, it does not mean all of the eligible segments are suitable for Wild and Scenic River status. Alternative B is the preferred alternative because it provides a balanced approach of protection/preservation of natural	Wild and Scenic Rivers

Commentor	Affiliation	Comment	Comment Summary Response	Category
			resources while providing for commodity production and extraction. Alternative B provides for Wild and Scenic River suitability with less management restrictions to allow for more flexibility in considering other land uses. The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	
John Hall jfhall666@yahoo.com		The DirtyDevilRiverand all tributaries eligible for Wild and Scenic should be protected.	The information presented by the commentor has been considered in the eligibilty report and subsequent NEPA analysis.	Wild and Scenic Rivers
John Hall jfhall666@yahoo.com		Designated routes in WSAs should be eliminated, and minimized in roadless areas and other lands with wilderness characteristics. Existing routs in these areas should be closed.	A range of alternatives considered a number of options for the inventoried ways in WSAs.	Wilderness Study Areas
John Mason JohnRM@eni.com		Please keep roads open for all uses. Emergency access is not to be overlooked. What if we need it someday in the event of a catastrophe? Please re-open roads that were useful for all purposes and served as emergency access. I'm sure honest citizens would be willing to report anyone who abuses the land and privilege to have open access.	As stated on page 2-69 of the Draft RMP/EIS: "All motorized or mechanized travel would be prohibited in closed areas, with the following exceptions: – For emergency and other purposes as authorized under 43 CFR 8340.0-5(a)(2),(3),(4) and (5); – Minimum use necessary to exercise a valid existing right or authorized use."	Transportation
Johnson Timothy	Congress of the United States	In particular, the BLM is proposing vehicle (ORV) routes in lands that it has inventoried and acknowledged as possessing wilderness values, such as Fisher Towers, Labyrinth Canyon, Goldbar Canyon and Beaver Creek. By officially designating off-road vehicle routes in Utah's roadless areas, the agency is not protecting unique cultural artifacts and wildcrncss values. As a result, these ORV plans will be devastating to some of the most significant public lands and prehistoric cultural resources in the country.	Of those areas listed, on a small portion of Labyrinth Canyon is located in the RFO. BLM does not have "roadless areas," which is a term used by the US Forest Service. The range of alternatives within the Draft RMP EIS include the closure of some routes within the non-WSA lands with wilderness characteristics.	Travel Management – OHV Route Identification
Jon Gum jon.gum@gmail.com	Coalition to Preserve Rock Art	North Otter Creek This region should be designated an ACEC. The images in this region are unique. They were created by the Native Americans of the region that had been pushed out of their historical lands and were taking shelter from persecution by the early Mormon pioneers. These painted glyphs are located within a current campground just south of Greenwich. They represent a unique archeological heritage that must be protected and documented. Campgrounds and rock art are a dangerous combination for rock art protection.	The current campground in the Greenwich area is west of Greenwich. This campground is managed by the Fishlake NF, therefore is outside of the jurisdiction of this NEPA document.	Areas of Critical Environmental Concern
Jon Gum jon.gum@gmail.com	Coalition to Preserve Rock Art	Manning Canyon This area should be designated as an ACEC. This canyon was a likely travel route to the Fish Lake mountains. The rock art and archeology span a broad period of time from the archaic period to modern times. Some of the figures are unique to the area. The rock art panels cover a relatively small area. Due to the small size of this potential ACEC, alternative management options could be considered	As required by BLM's ACEC handbook (1613.41), the Richfield Field Office encouraged the public to submit ACEC nominations during public scoping. ACEC nominations were specifically requested in the Notice of Intent to prepare a land use plan from November 1, 2001. The BLM received several requests for additional ACECs during the public comment period on the Draft RMP/EIS. However, these requests did not contain enough information supplied to assess	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
		which would not disclose the boundaries. Existing OHV spur roads from the Paiute Trail should be closed.	the proposals for their relevant and important values.	
Jon Gum jon.gum@gmail.com	Coalition to Preserve Rock Art	North Wash We believe this canyon should be designated an ACEC. North Wash was a cultural corridor from lower to higher elevation areas. The canyon contains several significant rock art sites including the spectacular Barrier Canyon Style "Moqui Queen" at Hog Springs, panels across the road from this location, archaic panels at mile marker 27, and a Navajo site that receives current cultural use. The panels at mile marker 27 are especially significant because an archaic figure includes a bow and arrow. This provides temporal limits on both the style and the introduction of the bow and arrow into the region. Although this site has received no protection, in the past or under this RMP, it is one of the most important panels in the state.	The North Wash area was considered as an ACEC for cultural R&I values. This area was considered in the range of alternatives as part of the Dirty Devil ACEC for the for the decisionmaker to consider in developing the Proposed RMP and ROD.	Areas of Critical Environmental Concern
Jon Gum jon.gum@gmail.com	Coalition to Preserve Rock Art	Bubble Caves We believe this area should be designated an ACEC. These caves, south of Monroe and east of Joseph have painted figures that tie into the figures previously described under the North Otter Creek area. The panels incorporate unique rock features in the design of the glyphs. OHV traffic on the current roads appears reasonable. However, we are concerned that this area is permitted for oil and gas development. We believe that no surface occupancy for mineral extraction is essential considering the fragile nature of the rock surfaces on which the figures are painted.	As required by BLM's ACEC handbook (1613.41), the Richfield Field Office encouraged the public to submit ACEC nominations during public scoping. ACEC nominations were specifically requested in the Notice of Intent to prepare a land use plan from November 1, 2001. The BLM received several requests for additional ACECs during the public comment period on the Draft RMP/EIS. However, these requests did not contain enough information supplied to assess the proposals for their relevant and important values.	Areas of Critical Environmental Concern
Jon Gum jon.gum@gmail.com	Coalition to Preserve Rock Art	Bull Creek Archeological District West of Bull Creek are several sites of national significance. We believe the district boundaries should be extended to include Upper Town Wash, Avery Seep, and the Stone Corral site south of Upper Town Wash and should be given ACEC protections. These areas include Archaic style sites including a rare Chihuahuan Polychrome site that has been abraded and superimposed with a Barrier Canyon Style figure. Stone Corral was a food processing and habitation site with images on both the ground and ceiling surfaces. We believe that this entire area should be managed to include all of the priorities we list in our ACEC designation.	The Bull Creek Archaeological District was considered as an ACEC for cultural R&I values. This area was considered in the range of alternatives as an ACEC in Alternatives C and D. Therefore, these are available the for the decisionmaker to consider in developing the Proposed RMP and ROD.	Areas of Critical Environmental Concern
Jon Gum jon.gum@gmail.com	Coalition to Preserve Rock Art	Quitchupah Ethnographic surveys conducted by the BLM have indicated that Quitchupah is a sacred canyon to the Paiute tribe who consider the entire canyon to be a ceremonial location. Local lore also indicates that Quitchupah canyon was a route used by the Uintah Ute tribe traveling to Fish Lake for the annual Sun Dance Ceremony. Ute rock art figures are found in the canyon. Sites in the canyon range from ritual locations that consist of only a small clairn to Fremont, Paiute, Ute, and outstanding Barrier Canyon and other Archaic rock art. Current ACEC boundaries proposed in alternatives C and D are so small that they would constitute effective disclosure of archeological site locations and fail to protect important sites. We strongly believe that this ACEC should be	The checkerboard land ownership pattern in the Quitchupah area makes designation and management of a large ACEC impractical. A larger boundary was submitted early in the RMP/EIS process, but the ID Team determined the boundaries as described in the Draft RMP/EIS would protect the R&I values on BLM lands.	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
		implemented under any alternative but that the boundaries be expanded to include all BLM land one mile on either side of the creek from Highway 10 to the Forest Service boundary. This would include more sites of importance while providing less disclosure of their locations. These expanded boundaries would include pithouses, archeoastronomy sites, rock art, and ceremonial locations. Combined these sites create an archeological complex that would be of more importance for scientific understanding of the ancient people who lived in and used the canyon. We also advocate a land swap with State Trust Lands for the parcel of land at the junction of Quichupah and North Creek. This would create a contiguous archeological corridor. We support the suggestions for protection of archeological resources included in the current ACEC description.		
Jon Gum jon.gum@gmail .com	Coalition to Preserve Rock Art	There is no documentation in the RMP of the process used to identify cultural resources requiring protection. All other RMPs that we have reviewed in the past couple of months (Moab, Price, Vernal, Kanab, and Monticello) have clearly identified their cultural resource protection process. We are troubled that the Richfield RMP does not include this information. “Overall, less than 5% of the RFO has been inventoried.” (Page 3-19) Given the lack of information on process it is difficult for our organization to evaluate any of the alternatives as to their effectiveness at protection of cultural resources.	The Draft RMP/EIS states that all applicable laws and regulations will be followed. This includes the laws, regulations and policies outlining the inventory and evaluation of cultural resources. Since the BLM is bound by the same laws and regulations as other Federal agencies, the BLM didn’t feel it necessary to reiterate them all in the Draft RMP/EIS.	Cultural Resources
Jon Gum jon.gum@gmail .com	Coalition to Preserve Rock Art	Only three sites within the region have been nominated to the NRHP, of these only two protect pre-historic cultural resources. Many other sites are eligible, but the BLM has not been pro-active to list them on the NRHP or protect them (Page 3-20/21). This is despite the BLM’s own understanding that site conditions are deteriorating. Given this observation, it is difficult for us to reconcile the minimal level of protection to archeological resources provided under any of the BLM proposals.	The legal protections afforded to cultural sites list on or eligible for the National Register of Historic Places are the same due to a 1980 amendment to the NHPA. As a result, there has been no advantage to listing sites on the National Register since that amendment.	Cultural Resources
Jon Gum jon.gum@gmail .com	Coalition to Preserve Rock Art	It is our understanding that Section 106 (16 U.S.C. § 470f) obligates the BLM to consider the effects of management actions on cultural resources listed or eligible for listing to the National Register of Historic Places. Section 110 of the NHPA requires the BLM to manage and maintain those resources in a way that gives “special consideration” to preserving archaeological and cultural values. Section 110 also requires the BLM to ensure that all historic properties under the jurisdiction or control of the agency are identified, evaluated, and nominated to the National Register of Historic Places. Id. § 470h-2(a)(2)(A). How can the BLM claim to be honoring their legal responsibilities when they are not using real data regarding archeological sites to make management decisions? We do not support a decision-making process which is not based on actual rock art and archeological site inventories.	The baseline cultural resource data that BLM used in the RMP is the best available at the time of publishing and constitutes BLM's present knowledge of the current cultural resource situation. Since the Section 106 and 110 inventories that have been done make up all of the cultural resource information that presently exists, that is what forms the basis for the Draft RMP/EIS discussion.	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
Jon Gum jon.gum@gmail .com	Coalition to Preserve Rock Art	None of the alternatives provided under this RMP provide any information as to how many of the known archeological sites are protected. Without this basic information it is difficult to assess the level of protection being provided to archeological resources under any of the options.	The BLM's policy is to protect all cultural resources. Protection is accomplished largely through avoidance of disturbance of sites, which is the BLM's preferred method of mitigation.	Cultural Resources
Jon Gum jon.gum@gmail .com	Coalition to Preserve Rock Art	In addition to ACECs, Monticello is proposing the designation of Cultural – Special Recreation Management Areas and Cultural - Special Management Areas (C-SMA). Regardless of the designation, whether it be C-SMA, C-SRMA, or Cultural ACEC we think that the significant archeological sites we mention below should be protected with the following minimum provisions: ? Area is managed for archeological resource management and protection ? Site locations should not be publicly disclosed unless BLM conditions for sites managed for public conditions be met ? Archeological resource inventories should be completed and sites fully IMACS documented ? No surface disturbance for oil and gas or mineral development ? No leasing for oil and gas or mineral development since this creates roads that encourage access to archeological locations and causes degradation of sites through dust and vehicular exhaust ? Significant sites should be nominated to the NRHP given the high degree of documentation that this process requires ? OHV access, camping, climbing, and other recreational activities should not be permitted within a quarter mile of sites ? VRM Class 1 since rock art is created in a geographical context ? No gunfire due to the amount of damage that rock art has historically sustained through shooting. In this proposal we generally recommend the use of ACEC designations to protect archeological resources, but we can accept alternative designations that include the previously listed provisions.	The designations the commentor raised are not all designed to manage for the protection of cultural resources. SRMAs are identified to address areas requiring more intensive management than ERMAs, but the management objectives focus on recreational settings, experiences, and benefits. ACECs are designated to protect relevant and important values, and management is developed to specifically protect those values. The management actions for each ACEC were designed to protect and prevent irreparable damage to the relevant and important values. A standard set of management for all ACECs is not practical since each ACEC is designated to address different values and threats. The management protections identified by the commentor are not necessary for the protection of cultural resources. The management identified for each management area is designed specifically to protect the identified values.	Cultural Resources
Jon Gum jon.gum@gmail .com	Coalition to Preserve Rock Art	Fish Creek We are especially concerned about the Fish Creek Cove rock art site. Our concern with this designation is its size. The wild and scenic river designation only covers .25 miles. This effectively constitutes public disclosure of a site location. BLM procedures require the following to take place prior to public disclosure of site location: Sites managed for public values must first have their information potential recovered through appropriate study guided by an approved research design to mitigate the impacts of visitor use and to provide information for interpretation. • Sites where scientific values are present, these values need to be protected or mitigated before the site is turned over to public use, including use related to SRP; • Provide sufficient supervision to protect both the public and the scientific values of these sites; • Provide access to these sites for the identified public users; and • Prepare specific site management plans for sites in this category • Information from test/sampling excavations will be used to define the extent of the sites and to obtain information needed to interpret them.	The size of the eligible Fish Creek wild and scenic river segment is determined by the amount of BLM land in the area (40 acres isolated parcel). The language related to public disclosure of site location is from Appendix 5 of the Price Draft RMP/EIS, and does not reflect BLM policy for the Richfield Field Office. The Fish Creek Cove area was included in the potential Fremont Gorge/Cockscomb ACEC.	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		We do not believe that .25 miles of river are sufficient for wild and scenic river designation and that this location be preserved for the values that it represents – a nationally significant archeological site. We believe that this site should be designated an ACEC.		
Jon Gum jon.gum@gmail .com	Coalition to Preserve Rock Art	Development We are concerned with development near rock art sites including campgrounds, roads, OHV trails, oil and gas exploration and development which includes seismic testing, pipelines access roads, and mineral extraction. It is clear to us that the greater the number of people that have access to a site, the higher the probability that the site will be vandalized. Recent research (Spangler, Jerry: Site Condition and Vandalism Assessments of Archeological Sites, Lower and Middle Arch Canyon; Colorado Plateau Archaeological Alliance; 2006) confirms our experience.	The Draft RMP/EIS acknowledges that the illegal activities, such as vandalism and looting, may be impacted by changes in access, as is specifically identified in section 4.3.5. The Draft RMP/EIS does not include a detailed analysis of illegal activities. Enforcing the RMP decisions is an implementation-level action. Concerning the impacts from OHV leaving routes that are identified in an alternative, the Draft RMP/EIS analyzes the effects of the proposed actions, which does not include public land users driving off identified routes in areas that where OHV use is limited to identified routes.	Cultural Resources
Jon Gum jon.gum@gmail .com	Coalition to Preserve Rock Art	We are concerned about the absence of a clearly stated intent to initiate Section 106 compliance prior to the designation of OHV routes and other development activities. Because roads provide access to site areas their impact is much greater than their narrow road corridor. The location of roads and OHV routes must give consideration both to the archeological resources directly in their path and the resources they provide access to. We believe it is essential that Class II or III cultural inventories be prepared in advance of recreational use or OHV designations. As a result we believe that the proliferation of OHV routes in the area needs to be carefully considered. Those that provide direct access to important archeological resource sites should be closed at least one quarter mile from sites eligible for NRHP status.	All the OHV Play Areas identified in the Proposed Plan have had a cultural clearance performed. There would be no impacts to cultural resources in these areas. The BLM will adhere to its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available.	Cultural Resources
Jon Gum jon.gum@gmail .com	Coalition to Preserve Rock Art	Dirty Devil We support the Wild and Scenic River designation for the Dirty Devil. We are unsure whether the Robber's Roost panels near the river are included in this designation. If not, they should be. The Robber's Roost panel demonstrates ceremonial elements with ties to Hopi rock art of Arizona. This is an area of mixed style images with figures demonstrating elements of Barrier Canyon and Fremont styles	The Draft RMP/EIS identifies specific management prescriptions within one-quarter mile of each side of the rivers identified as suitable. In addition, the area discussed within the comment is within the Dirty Devil WSA which provides management protection. The Robber's Roost pictograph panels next to the Dirty Devil River would therefore be included in the Wild and Scenic River designation.	Wild and Scenic Rivers

Commentor	Affiliation	Comment	Comment Summary Response	Category
		that may be helpful in understanding the transition from Barrier Canyon to Fremont cultures. (Geib; Glen Canyon Revisited)		
Jonathan Wallace jon.wallace@gmail.com		I believe that land use should be based on the best current science and that the use of the land should take in to consideration both current and future generations. I also believe that land not designated as wilderness and opened up for use should not allow one type of user to degrade the experience of all others. Off highway vehicles (OHVs) do exactly that. They scar the fragile desert landscape in a way that is long lasting and disproportionately destructive in comparison to other use groups. My experience is that OHVs leave a trail of destruction where ever they go. The problem these days is the so called "shared use" trails are not very quiet. I get sick of hearing the noise, smelling the exhaust, and seeing the stains and marks where ever they go. I do not support opening up any more land for destructive OHV use. Everyone I know or have met who comes to Utah talks about how beautiful it is. I believe that the future economy will become more and more based on tourism that is on foot or bike. Saving wilderness and limiting destructive land use will only enhance that prospect.	The BLM analyzed the impacts of travel management as outlined and described in Chapter 4 of the DRMP/DEIS. Congress recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. Also, specific decibel limitations on motorized vehicles are under the jurisdiction of the Environmental Protection Agency, and a matter of State Law. As stated in 43 CFR 8343.1(b): “No off-road vehicle equipped with a muffler cutout bypass, or similar device, or producing excessive noise exceeding Environmental Protection Agency standards, when established, may be operated on public lands.”	Travel Management – OHV Area Categories
Judy Hopkins judehop@msn.com		As a property owner living in Grover on Miners Mountain Road I would like to comment concerning two parcels of land that have been identified in the draft proposal for proposed sale under FLPMA Sections 203, Wayne County. The two parcels of land are listed in Table A5-4 as tract 19 and 20. Tract 19 (T.30 S., R. 5 E., Sec. 3 E½SE¼SE¼) 20 acres Tract 20 (T.30 S., R. 5 E., Sec. 11., W½W½-less mineral patent 43-77-0006) +/- 160 acres Concerning Tract 19 1. The Federally listed threatened plant species, Last Chance Townsendia, Townsedia aprica has been identified on this parcel. That should preclude the listing of this property for sale. The BLM should continue to implement conservation measures to reduce adverse impacts to this plant. Concerning Tract 20 1. The Federally listed threatened plant species, Last Chance Townsendia, Townsedia aprica has been identified on this parcel. That should preclude the listing of this property for sale. The BLM should continue to implement conservation measures to reduce adverse impacts to this plant. 2. This property includes Carcass Creek, one of just a couple of perennial streams in this very arid area providing important riparian habitat for resident wildlife populations. It is considered critical Mule Deer and Elk habitat by the Utah Division of Wild Life Resources as it provides food, water and seclusion for the deer and elk that forage in the adjacent agricultural land in large numbers year round. This property provides a corridor from National Forest land to the private agricultural lands for foraging. Additionally it provides vital habitat including the stream, a meadow and tall trees for a large (40+) flock of wild turkey for breeding, nesting and brood-rearing on a year	Conservation strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		round basis. Large herds and flocks spend the winter on this property. It would be a significant loss to the wildlife, nature observers and the local hunters if this valuable property were not maintained in its natural state by the BLM. Carcass Creek is also important in that it provides water for livestock and down stream irrigation. Although not a perennial stream Rock Creek also flows through the subject land.		
Judy Hopkins judehop@msn.com		Scenic Byway 12, also designated as an All American Highway requires preservation of the view shed from the highway. The subject lands are within the view shed of Highway 12. There are many scenic byways but very few have been designated as All American Highways. The Draft RMP has not addressed the impact of view shed preservation under the scenic byway designation.	BLM is currently developing a management plan for Utah Highway 12. The RMP would be consistent with this plan.	National Trails & Backways
Judy Hopkins judehop@msn.com		2. There is plenty of private property in this area for sale so that it does not seem necessary for BLM to put this property up for sale. Grover is unincorporated and does not have the infrastructure to deal with a significant increase in homeowners. This land should remain as a public land to be utilized by all, human and wildlife alike.	include the following and link response to concern addressed in lands and realty: BLM disposal action doesn't mean conflicting development would occur. Future use of the land would need to meet existing planning and zoning restrictions.	Socioeconomics
Judy Hopkins judehop@msn.com		1. If this property was sold and numerous homes built, the availability of domestic water could be put at risk and would be a critical issue. Several current homeowners in the area have had problems in the past with decreased capacity and complete drying up of water in their wells necessitating re-drilling. Several of the existing wells have significantly diminished capacity and static levels during periods of drought.	The federal government has delegated the authority to allocate water within state boundaries to state governments. Water uses are regulated by the State Engineer. This means that property owners must seek water rights from state governments to obtain and provide water for private uses.	Water Resources
Judy Smith		Providing a system of trails and "playrounds" for ORV use makes sense. The extent ,of these ORV areas in the preferred Plan B proposal, however, is too vast and dispersed to be effectively monitored.	As stated on page 2-64 of the Draft RMP/EIS: "If OHV use in areas designated as open or limited causes threats or adverse impacts to resources, the BLM would take appropriate steps, including but not limited to use restrictions or closures, installation of additional signs and barricades, restoration of affected areas, etc."	Transportation
Judy Zumwalt		Many of the BLM lands in Sanpete County are on the 'for sale/trade' list. I feel first consideration for any sale or trade should be given to the local, county or state governments for public purposes (wildlife habitat, recreation areas and the like) rather than to private interests.	The local governments were given the opportunity to identify isolated and/or uneconomical parcels that they may have interest in as part of the RMP process. The tables in Appendix 5 identify parcels that local governments desire for potential future community expansion. However, local, county, or state governments may apply for any of the parcels identified in the tables for FLPMA Section 203 sale or other public land under other current authorities for public purposes. Preference is generally given to applicants that would provide a public benefit.	Lands and Realty
Judy Zumwalt		It appears to me that Alternative B has excluded some historically accessed routes. I believe the following routes should remain open and included in Alternative B: Sam's Mesa Routes, Happy Canyon Route and Spur Route at T31S-R15E (all on the Dirty Devil 100K map); Connector road east of Bicknell (Fremont Gorge 100K map); Muddy Creek Route, Spur route at T27S-R8E, Wood Bench spur route, North Pinto Hills Route and Angel Cove Route (on Hanksville 100K map); Connector roads at T27S-R3W, Miners Park spur routes and connector	Data available for routes on Sam's Mesa was analyzed and designated as open or open to 50" or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed for consistency with other resource decisions of the RMP and coordination with Glen Canyon NRA. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the preferred	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
		route at T27S-R3W (all on Sevier River Central100k map).	alternative. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns. T.27 S., R.8 E., spur route Comment lacked specificity to identify Wood Bench Spur Route. Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) would be reassessed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the preferred alternative (PTSR0201).	
Julianne French		• Declare the Canyonland wild burros and their habitat an Area of Critical Environmental Concern(ACEC) as the cumulative impacts to their national populations under BLM management plans and decisions have educed them to less 2,700 or less with only 5.6 million acres of habitat still remaining.	The BLM ID Team reviewed the Canyonlands HMA for its potential to be an ACEC with the wild burro population as a relevant and important value. The ID Team determined the wild burrs do not meet any of the relevance criteria. Therefore, this area does not qualify as an ACEC and was dropped from further consideration as an ACEC.	Areas of Critical Environmental Concern
Julianne French		• All natural water sources currently being used by the Canyonland burros must be permanently protected and guaranteed and if necessary to preserveviable herds,water developments must be allowed to be constructed and maintained within the Herd Management Area.	There are adequate vegetation resources to increase the herd size to 120-200, however, water sources are very limited. There is not enough water to support this range of herd size year round. There are no actions in the RMP that would elimate or transfer acreage or water within the HMA. There are no actions in the RMP that would transfer mangement of the wild horses and burros to other agencies. Livestock grazing on 30% of the Canyonlands HMA has been relinquished to the Canyonland Trust, with no plans for livestock grazing to occur in these areas. A detailed plan for the Canyonlands burros is outlined in the AML (Appropriate Management Level). There are no plans to give prioirty to wildlife over burros within the HMA; UDWR manages wildlife populations, BLM's authority is to manage burro populations.	Wild Horses and Burros
Julianne French julianne9@cox.net		I would like to express my support for Alternative D in the Richfield Draft Resource Management Plan that would raise the Canyonland Herd Management Areas wild burro population to a range of 120-200 wild burros. However, I would like the BLM to make the following modifications to ensure the permanent preservation of the Canyonland burros, their HMA and the critical habitat requirements they need to survive. ·No acreage or water sources should be eliminated, transferred or sold from the historical Herd Areas or Herd Management Areas. ·All natural water sources currently being used by the Canyonland burros must be permanently protected and guaranteed and if necessary to preserve viable herds, water developments must be allowed to be constructed and maintained within the Herd Management Area. ·No wild	There are adequate vegetation resources to increase the herd size to 120-200, however, water sources are very limited. There is not enough water to support this range of herd size year round. There are no actions in the RMP that would elimate or transfer acreage or water within the HMA. There are no actions in the RMP that would transfer mangement of the wild horses and burros to other agencies. Livestock grazing on 30% of the Canyonlands HMA has been relinquished to the Canyonland Trust, with no plans for livestock grazing to occur in these areas. A detailed plan for the Canyonlands burros is outlined in the AML (Appropriate Management Level). There are no plans to give prioirty to wildlife over burros within the HMA; UDWR manages wildlife populations, BLM's authority is to manage burro populations.	Wild Horses and Burros

Commentor	Affiliation	Comment	Comment Summary Response	Category
		horse/burro range or critical habitat requirements should be transferred to agencies that refuse to protect wild horses and burros (such as the National Park Service, who does not "manage them" and considers shooting them as a humane population control method). ·The BLM has acknowledged that the Canyonland wild burros are a rare type of burro in the wild and clear and detailed preservation plans must be provided for them, including proper forage and water allocations to support the proposed population range of 120-200 wild burros, even if it requires reductions in livestock grazing to support viable herds. ·Do not allow big game species, whose numbers far outweigh the remaining burros on public lands, to be managed as a priority within the Herd Management Area.		
Karen Eng-Toda		I do not believe that group sizes should be limited to 10 vehicles under the proposed criteria for Special Recreation Permits. This number is unrealistic and should be at 25 vehicles or 50 people. Also, I don't believe a SRP should be a time limit of 2 hours in an area. To have a time limit is very impractical.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Karen Eng-Toda		I do not believe that group sizes should be limited to 10 vehicles under the proposed criteria for Special Recreation Permits. This number is unrealistic and should be at 25 vehicles or 50 people. Also, I don't believe a SRP should be a time limit of 2 hours in an area. To have a time limit is very impractical.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Karl Spielman 2karlspielman @comcast.net	Utah Back Country Pilots	Our concerns in this regard are several. One is that we do not believe that we are Off Highway Vehicles. We do not believe that the BLM considers us as such either. This distinction is of great importance to us, because we realize that our access may suffer as a result of responses to impacts for which we are not responsible. 1 The BLM Price Field Office answers questions on its San Rafael San Rafael Travel Plan; http://www.ut.blm.gov/sanrafaelohv/comments.htm REC49 - Mexican Mountain airstrip is illegal and should not remain open. RESPONSE: Closure of backcountry airstrips requires consultation with the Federal Aviation Administration and the State Division of Aeronautics. This comment is beyond the scope of the EA and Route Designation Plan because aircraft are not considered OHVs.	BLM does not define aircraft as OHVs. Closure of backcountry airstrips requires consultation with the Federal Aviation Administration and the State Division of Aeronautics and is beyond the scope of this land use plan.	Transportation
Kathleen Sgamma	IPAMS	On page 2-4 of the DRMP/EIS, the BLM states the following management action would be common to all alternatives: "Manage all BLM and BLM-authorized actions to maintain air quality prescribed by Federal, tribal, state, and local laws and regulations. This includes meeting the National Ambient Air Quality Standards (NAAQS) and ensuring that BLM authorized actions continue to keep the area in attainment, meet Prevention of Significant Deterioration (PSD) Class II standards, and protect the Class I air sheds. Mitigate potential adverse impacts of site-specific actions identified in NEPA documents prepared	Please see revised air quality management actions in Chapter 2 of the PRMP/FEIS. The BLM recognizes that the State of Utah has the regulatory authority and responsibility to enforce air quality regulations. BLM will continue to exercise its land management authority and responsibility to analyze potential air quality impacts, to set levels-of-concern and desired-future-conditions, and to support air resources monitoring.	Air Quality

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		at the time an action is proposed, through best available control technology as part of the state permitting process and PSD review." The BLM must significantly revise this proposed management action because it violates the Clean Air Act (CAA) and potentially unreasonably limits the BLM's ability to effectively manage the public lands. The BLM does not have any direct authority over air quality or air emissions under the Clean Air Act (CAA). 42 U.S.C. §§ 7401 et seq. Under the express terms of the CAA, the EPA has the authority to regulate air emissions. In Utah, the Environmental Protection Agency (EPA) has delegated its authority to the State of Utah, Department of Environmental Quality (UDEQ). The Secretary of the Interior, through the Interior Board of Land Appeals (IBLA) has recognized that the state departments of environmental quality, not the BLM, has authority over air emissions. Wyoming Outdoor Council, et al., IBLA No. 2006155, Order at *12 (June 28, 2006). The BLM does not have authority to regulate emissions in Utah. The BLM must eliminate or revise the proposed management action.		
Kathleen Sgamma	IPAMS	The analysis of ACECs in the DRMP does not demonstrate that the relevance and importance criteria are met for the ACECs, and we believe existing laws and regulations are sufficient to protect the natural resource values identified.	Information associated with the process used for evaluating nominations for ACEC is included in the Draft RMP/EIS in Appendix 1. Full documenation of the process is included in the ACEC Evaluation Report, Richfield Resource Management Plan, January 2005. This report was made available to the public, and is readily available for viewing by the public at Richfield Field Office and on the Richfield RMP planning website.	Areas of Critical Environmental Concern
Kathleen Sgamma	IPAMS	Many of the decisions or possible decisions in this document involve taking large amounts of land that are prospective for development or have development and effectively removing these lands from multiple uses.	Section 203 of FLPMA provides authority for BLM to make land tenure adjustments as stated in Table 2-18 of the Draft RMP-EIS.	Lands and Realty
Kathleen Sgamma	IPAMS	By a 2006 Directive from the BLM Director, the BLM cannot effect a de facto closure of thousands of acres of public lands to oil and gas leasing without following FLPMA's Section 204 withdrawal procedures: "Except for Congressional withdrawals, public lands shall remain open and available for mineral exploration and development unless withdrawal or other administrative actions are clearly justified in the national interest in accordance with the Department of the Interior Land Withdrawal Manual 603 DM 1, and the BLM regulations at 43 C.F.R. 2310." BLM Energy and Non-Energy Mineral Policy (April 21, 2006). The BLM formally adopted this policy through 1M 2006-197. Consequently, the 2006 Energy and Non-Energy Mineral Policy with which the BLM must comply, conditions the closure of lands available to mineral exploration and development on FLPMA's withdrawal procedures.	FLPMA requires the Secretary of the Interior to comply with certain procedural mandates prior to closing an area of 5,000 acres or more to mineral development. Among the other requirements imposed on the Department of the Interior is the requirement for the Secretary of the Interior, as compared to the Director of the BLM or a State Director, to make all withdrawals of federal lands. Withdrawals only apply to the general land laws which includes the Mining Law of 1872, as amended. The alternatives close areas to oil and gas leasing which is discretionary and does not require a withdrawal. Closing an area to oil and gas leasing is different than a withdrawal.	Lands and Realty
Kathleen Sgamma	IPAMS	In addition, many of these decisions that remove lands from mineral leasing require the BLM to follow FLPMA's withdrawal procedures under 43 U.S.c. §1714. Some of these decisions may exceed the authority	BLM guidelines allow areas to be closed to oil and gas leasing when resource management requires this type of restriction. Some areas such as WSAs are closed to leasing by statute, Federal Oil and Gas Leasing Reform Act of 1987.	Minerals and Energy – Leaseable

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		granted BLM under its organic act.	Closing an area to leasing under the land use plan is not the same as withdrawing the land from the Mineral Leasing Act. The Draft RMP/EIS does not recommend withdrawing lands from oil and gas leasing.	
Kathleen Sgamma	IPAMS	The BLM fails to acknowledge in the DRMP/EIS that the impacts from oil and gas are temporary, the footprint is small, and that reclamation is successful to the point that areas with previous oil and gas activity are now being proposed for wilderness protections. The fact that the impact is temporary - on average 20-30 years, the lifespan of a typical well- means that the activity does not irreparably harm the land and therefore does not require vast acreage to be put off limits. Rather, exploration and production activities are compatible with protecting the land, and locking away vast energy resources is not necessary.	The reasonable foreseeable development scenario (Appendix 12) describes the anticipated footprint associated with oil and gas development. The duration of impacts is addressed in Chapter 4 of the Draft RMP/EIS.	Minerals and Energy - Oil and Gas
Kathleen Sgamma	IPAMS	The Energy Policy Conservation Act of 2000 and executive order 13211 place emphasis on identifying and eliminating impediments to natural gas and oil development. The Preferred Alternative would have a long-term adverse impact on mineral resource development in the planning area by placing additional restrictions on oil and gas development: • Decrease the amount of land open to oil and gas leasing under standard stipulations from 1,236,500 to 545,000 acres. • Increase the amount of land with Controlled Surface Use (CSU) and Timing Limitation (TL) restrictions from 409,200 to 1,021,600 acres. • Increase the amount of land designated No Surface Occupancy (NSO) from 22,600 to 110,900 acres.	The Draft RMP/EIS discloses areas that are available to be leased, there are reasons why certain parcels of land are not available to be leased such as cultural resources, WSAs, ACECs, and habitat for threatened and endangered plant and animal species. The acreage available for leasing under Alternative B will be more restricted than under Alternative A. The Draft RMP/EIS analyzed a range of alternatives to evaluate the impacts and select the preferred alternative.	Minerals and Energy - Oil and Gas
Kathleen Sgamma	IPAMS	Another area of restrictions that is of concern is the extensive use of blanket winter stipulations in the Preferred Alternative. These substantial winter drilling restrictions will shut out operators for six months, leaving a very limited time for oil and gas activity. Land managers should have the flexibility to approve projects that propose innovative ways to mitigate the impacts on wildlife in exchange for year-round drilling, such as directional drilling projects. With winter stips, a drilling rig has to be relocated at the end of the season, which extends the timeframe for drilling activity from a concentrated period of time to several years. Multi-well pads must be considerably larger when the rig must be removed and reassembled. When a rig can stay on site year round, drill multiple wells, and then leave, less maneuver room on the pad is necessary, and total drilling time is reduced. The winter stips in Alternative B should be revised to give land managers this flexibility.	The Draft RMP/EIS includes exceptions for timing limitations on oil and gas leasing (appendix 11). The Final RMP/EIS has been revised to include the following exception for the crucial and high value mule deer and elk habitat timing limitation. "Consider exception if deer and/or elk are not present or if the lessee/operator can demonstrate that adverse impacts can be mitigated."	Minerals and Energy - Oil and Gas
Kathleen Sgamma	IPAMS	While the BLM has a duty under section 201 to inventory lands, including those that may contain "wilderness characteristics," BLM may not unlawfully apply the WSA non-impairment standard to any of those lands found to contain wilderness characteristics. State of Utah v: Norton, 96-cv-870, (D. Utah), Stipulated Settlement at Pargrashs 13, 17. The requirements to inventory and protect are distinct. The BLM must	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. The Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA § 603 and required to be managed under § 603's non-impairment standard, and other	Non-WSA Lands with Wilderness Characteristics

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		still provide for multiple use even if certain lands contain what the BLM considers to be the elements of "wilderness." Furthermore, containing elements and properties of "wilderness" is entirely distinct from meeting the statutory definition of wilderness under the Wilderness Act.	lands that fall within the discretionary FLMPA § 202 land management process. See also IM 2003-275.	
Kathleen Sgamma	IPAMS	Thus, the time for the BLM to create and recommend lands for wilderness designation under FLPMA has expired and those lands not included as wilderness study areas should return to the productive, multiple use status envisioned by FLPMA.	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	Non-WSA Lands with Wilderness Characteristics
Kathleen Sgamma	IPAMS	Lands with so-called wilderness characteristics that receive protection exceed the BLM's authority under FLPMA.	BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time	Non-WSA Lands with Wilderness Characteristics

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			wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs. Finally, the Utah v. Norton Settlement Agreement does not affect BLM's authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA § 603 and required to be managed under § 603's non-impairment standard, and other lands that fall within the discretionary FLMPA § 202 land management process. See also IM 2003-275.	
Kathleen Sgamma	IPAMS	The large amount of resources put off limits by management decisions, particularly in Alternative D, should however, be reflected in the economic analyses in Chapters 3 and 1. The charts in Section 4.4.6.1.1.1 show how as the Alternatives become more restrictive, less resource is available under standard lease terms. This makes development of the resource more expensive for operators, and can lead to a situation where it is no longer economically feasible to develop. Restricting access to resources either up front by putting acreage off limits or making it too expensive to drill has the same effect of curtailing development of vital energy resources, and negatively impacting the rural economy of the five county area.	Whether cost impacts result in development becoming noneconomic depends substantially on outside factors such as the price of oil and gas. Moreover, the Reasonably Foreseeable Development (RFD) scenario, appendix 12, foresees a certain level of development in the study area as a whole and provides the average number of wells expected to be drilled under each alternative. Constraints in the various alternatives could impact exactly where development occurs. However, nearly 80% of the oil and gas wells projected in the RFD are located along the west side of the planning area where public lands are either open to leasing under standard terms or open to leasing with controlled surface use or timing stipulations, as stated in the RMP chapter 4 Alternative N Leasable Minerals – Oil and Gas section. In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Alternative A of the Draft RMP/EIS favors mineral development over protection of resources. Alternative C favors the protection of resources over the extraction of mineral development. Alternative D is the same as Alternative C except it includes management of lands with wilderness characteristics to preserve those characteristics. Alternative B is designed to be a balance between mineral development and protection of	Socioeconomics

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			resources. Table 2.1 in the Richfield DRMP/DEIS provides in comparative form the management actions associated with each alternative.	
Kathleen Sgamma	IPAMS	The Socioeconomic analysis in Section 3.6 is fundamentally flawed in terms of depth. On page 3-97 it is stated "Although some resources managed by the RFO may be of regional or national interest, this EIS assumes that RFO management decisions primarily affect the economies of the counties and towns within the five counties encompassed by the planning area boundary." IPAMS believes that is too narrow of a scope for analysis of the impacts. The energy resources in the planning area are vital not only to the local area in terms of jobs, but also to the state in terms of royalties and taxes, and to the nation in terms of domestic oil and gas supplies. The BLM has failed to analyze a major impact of its planning decisions on energy resources available to the community, state and nation,	Federal, State, and local governments' royalties and taxes from natural resources are addressed in section 3.6.2.2 of the DRMP/DEIS. Energy resource contributions in the Richfield Field Office (RFO) will be very small relative to national energy production. The BLM does not expect to see significant energy development (such as that experienced in Uintah Basin or parts of Wyoming) in the Richfield planning area over the life of the plan, as described in chapter 4. Therefore, BLM does not expect large (similar to the other areas noted above) socioeconomic benefits or costs from these activities to national, state, or local communities.	Socioeconomics
Kathleen Sgamma	IPAMS	Despite the positive impacts from economic growth and opportunity from oil and gas development, the DRMP/EIS does not contain a comprehensive analysis of the restrictive management decisions and how they can constrain current and future development. The BLM imposes several layers of severe restrictions on oil and gas development in the DRMP/EIS, without analyzing the full effects of the proposals.	Whether cost impacts result in development becoming noneconomic depends substantially on outside factors such as the price of oil and gas. Moreover, the Reasonably Foreseeable Development (RFD) scenario, appendix 12, foresees a certain level of development in the study area as a whole and provides the average number of wells expected to be drilled under each alternative. Constraints in the various alternatives could impact exactly where development occurs. However, nearly 80% of the oil and gas wells projected in the RFD are located along the west side of the planning area where public lands are either open to leasing under standard terms or open to leasing with controlled surface use or timing stipulations, as stated in the RMP chapter 4 Alternative N Leasable Minerals – Oil and Gas section. In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Alternative A of the Draft RMP/EIS favors mineral development over protection of resources. Alternative C favors the protection of resources over the extraction of mineral development. Alternative D	Socioeconomics

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			is the same as Alternative C except it includes management of lands with wilderness characteristics to preserve those characteristics. Alternative B is designed to be a balance between mineral development and protection of resources. Table 2.1 in the Richfield DRMP/DEIS provides in comparative form the management actions associated with each alternative. As far as the commentor's concern with multiple management layers and restrictions, "layering" is a planning tool. Under FLPMA's multiple-use mandate, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple-use concept, the BLM does not necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands. The process of applying many individual program goals, objectives, and actions to the same area of public lands may be perceived as "layering". The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Inconsistent goals and objectives can lead to resource conflicts, failure to achieve the desired outcomes of a land use plan, and litigation. Whether or not a particular form of management is restrictive depends upon a personal interest or desire to see that public lands are managed in a particular manner. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified for resolution in the land use plan. Layering of program decisions is not optional for BLM, but is required by the FLPMA and National BLM planning and program specific regulations. The FLPMA directs BLM to manage public lands for multiple use and sustained yield (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM's Land Use Planning Handbook requires that specific decisions be made for each resource and use (See Appendix C of the Land Use Planning Handbook "H-1601-1"). Specific decisions must be included in each of the alternatives analyzed during development of the land use plan. As each alternative is formulated, each program decision is overlaid with other program decisions and inconsistent decisions are identified and modified so that ultimately a compatible mix of uses and management prescriptions result. For example, the BLM has separate policies and guidelines, as well as criteria, for establishing ACECs and when the WSAs were established. These differing criteria make it possible that the same lands will qualify as both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies. The values protected by WSA management prescriptions do not necessarily protect those values found relevant	

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			and important in ACEC evaluation, and vice versa. This could apply to any set or series of designations, each with its own policy requirements.	
Kathleen Sgamma	IPAMS	The BLM has failed to analyze at all the economic impact of closing an additional 446,900 acres to energy development, and therefore, has clearly failed to fulfill its FLPMA obligation. Furthermore, the economic analysis fails to account for lost opportunities due to proposed management decisions, and seriously underestimates the negative impact of Alternative D.	An assessment of the socioeconomic impacts of oil and gas development is provided in section 4.6. The Reasonably Foreseeable Development (RFD) scenario, appendix 12, foresees a certain level of development in the study area as a whole. Constraints in the various alternatives could impact exactly where development occurs. The BLM acknowledges that within the range of alternatives, Alternative D places the greatest restrictions on minerals development, emphasizing the protection of resources over mineral development. In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Alternative A of the Draft RMP/EIS favors mineral development over protection of resources. Alternative C favors the protection of resources over the extraction of mineral development. Alternative D is the same as Alternative C except it includes management of lands with wilderness characteristics to preserve those characteristics. Alternative B is designed to be a balance between mineral development and protection of resources. Table 2.1 in the Richfield DRMP/DEIS provides in comparative form the management actions associated with each alternative. BLM acknowledges that some alternatives would have greater impacts on resource development than others. BLM believes that the preferred alternative appropriately minimizes such impacts while balancing other resource uses and values.	Socioeconomics
Kathleen Sgamma	IPAMS	In Section 3.6.2.1, it is stated that mining continues to provide the highest-paying jobs in the planning area, although there has been a decline over the last decade. However, this is based on data only up to 2000, before the important discovery of the Covenant Field in 2004. Again on page 3-107, the amount of severance tax is judged to be negligible in "recent years," although the data for that analysis stopped at 2003. The daya for the socioeconomic study should be updated to	The BLM acknowledges the importance of the Covenant Field to the local economy, especially in the form of fiscal impacts such as mineral lease payments, property taxes and severance taxes. The BLM will add a discussion of the Covenant Field and its production from 2004-2007 to Chapter 3. A large portion of the Field is located on non-BLM land, which is unaffected by planning decisions. The BLM will add to Chapter 4 an updated discussion of the fiscal impacts from current oil and gas production on public lands. Given that most	Socioeconomics

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		reflect the increased activity since that time, otherwise, the benefits from oil and gas development will be underrepresented. In section 4.6, on page 4-463, it is stated that the benefit to the local economy is small due to the low level of development. Again, this assumption is based on data before the Covenant Field discovery in 2004. The economic analysis in the DRMP should include the impacts from that discovery, especially since it was over three years ago.	recent production has been on non-BLM lands, the BLM expects the fiscal impacts attributable to BLM lands to be relatively small.	
Kathleen Sgamma	IPAMS	A recent study by the University of Utah's Bureau of Economic and Business Research(2) found that the oil and gas industry in Uintah and Duchesne counties accounts for 49.5% of employment and 60% of total wages. The average wage for exploration and production jobs is $84,795. Oil and gas accounts for 19.9% of direct employment and 34.8% of total wages. This shows that the 19.9% of direct employment is multiplied throughout the economy and results in 49.5% of employment, with a similar multiplier effect for wages from 34.8% to 60%. This study demonstrate the multiplier effect of oil and gas development. The same type of multiplier effect would be seen in the RFO; but the analysis in section 4.6 does not show an appreciation for this multiplier. Imposing additional restrictions on oil and gas activity would deny similar benefits to the rural economies of the five counties.	The University of Utah's The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry Phase I - The Uinta Basin study was found to have no information which would have altered the approach taken in the impact analyses of Chapter 4 in the DRMP/DEIS. The University of Utah study only looks at the oil and gas impact from current development and production. It doesn't consider different oil and gas development scenarios, nor does it report how much direct expenditures "leak out" of the study areas, which is crucial for determining the economic impact of changes in production. Further, the level of oil and gas development in the Uinta Basin is much greater than the level anticipated for the RFO. As a result, measurements of multiplier effects for the Uinta Basin are not valid for the RFO. The BLM acknowledges that there are important employment and income impacts from oil and gas activities, and findings on these “multiplier effects” have been incorporated in the PRMP/FEIS, based on BLM’s own analysis for Uintah County using date form the US Bureau of Labor Statistics, and the State of Utah Division of Oil, Gas and Mining that it will use as a proxy. to estimate job and income impacts from oil and gas exploration and development, and production, attributable to BLM lands. Additional analysis/discussion of employment and income impacts from oil and gas production has been added to the PRMP/FEIS. With respect to the comment on “additional restrictions,” BLM acknowledges that there are more restrictions in some alternatives than others. In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each	Socioeconomics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			management prescription or action. Alternative A of the Draft RMP/EIS favors mineral development over protection of resources. Alternative C favors the protection of resources over the extraction of mineral development. Alternative D is the same as Alternative C except it includes management of lands with wilderness characteristics to preserve those characteristics. Alternative B is designed to be a balance between mineral development and protection of resources. Table 2.1 in the Richfield DRMP/DEIS provides in comparative form the management actions associated with each alternative. BLM believes that Alternative B, the preferred alternative, appropriately minimizes restrictions on oil and gas development, allowing for economic access to and utilization of oil and gas resources while balancing other resource uses and values.	
Kathleen Sgamma	IPAMS	IPAMS recommends, that the data from this Utah State University study (Review of the Socioeconomic Analysis in the Draft Environmental Impact Statement Prepared by the USDI-Bureau of Land Management Richfield Field Office; Daniels, S.; Burr, S.; Gale, Jody; Godfrey, B.; Keith, J.; Krannich, R.; and Reiter, D. Utah State University, October 1, 2006.) be used in the socioeconomic analysis of the DRMP. We were surprised that this study, which is a review of the socioeconomic analysis of the DEIS, was not included in the references of the DRMP.	BLM has reviewed the study Utah State University, October 2006, Review of the Socioeconomic Analysis in the Draft EIS prepared by the USDI – BLM RFO (also known as the AOG study). It expressed concerns with the socioeconomic analysis of livestock grazing, oil and gas production, socioeconomic groups (or "neighborhoods"), and OHV use for the counties. The AOG study was a critique of the original DEIS; the current, public DEIS has been modified considerably, and has taken into account, directly or indirectly, many of the concerns expressed in the original AOG critique. The AOG study will be referenced in the PRMP/FEIS Based on the organization the commentor refers to, BLM assumes that the commentor's particular concern with respect to the AOG study is the analysis of oil and gas exploration and production in the AOG study and how that could apply to the RFO. Figures in that section refer to data from the Uinta Basin. The level of oil and gas development in that basin is much greater than the level of development expected in the RFO. Therefore, the jobs and income multiplier effects reported in the AOG study are not valid for the RFO. This section of the AOG study also contains an analysis of economic impacts in the six county AOG area for the Covenant field. However, important assumptions are missing from the discussion of this analysis, so its validity and usefulness for the RFO RMP/EIS cannot be determined. BLM has undertaken its own analysis for Uintah County using date form the US Bureau of Labor Statistics, and the State of Utah Division of Oil, Gas and Mining that it will use as a proxy to estimate job and income impacts from oil and gas exploration and development, and production, attributable to BLM lands. The assumptions in BLM's analysis, and the results, will be clearly stated in the PRMP/FEIS. BLM believes its methodology constitutes a reasonable approach to the economic impact analysis, producing valid results, within the guidelines for sufficient analysis established in Sec. 1502.2 Implementation of the CEQ regulations setting forth how the BLM is to prepare environmental impact statements.	Socioeconomics
Kathleen Sgamma	IPAMS	The BLM fails to disclose how the restrictions may combine to increase the consumer cost of gas which may be disproportionately borne by low-income populations, thereby not following Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-	The DRMP/DEIS Environmental Justice analysis in section 3.6.3 follows Executive Order 12898. This analysis determined there are no environmental justice populations in the socioeconomic study area. In addition, oil and gas development in the DRMP/DEIS study area is not large enough relative to total	Socioeconomics

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Income Populations, 59 Fed. Reg. 7629 (1994).	national and global oil and gas development to impact pump prices. Therefore, low-income communities would not be disproportionally impacted from oil and gas development restrictions in the DRMP/DEIS. Thus, actions required to identify and mitigate impacts to such populations are not required.	
Kathleen Sgamma	IPAMS	It is not clear from the document if the designation of large portions of the planning area as Class II is included in the acres of mineral estate that are considered as subject to major constraints, despite the fact that Class II restrictions would constitute a major impediment to development. Since oil and gas development is a temporary disturbance to the surface with temporary visual impacts, as most wells are abandoned after twenty to thirty years, the VRM provisions do not provide a reasonable balance between protecting vistas and developing energy resources needed by the nation. Full development of oil and gas resources would be virtually impossible in the 209,000 acres under the Class II designation. The blanket Class II designations violate EPCA, which mandates fewer restrictions on development of energy resources.	BLM currently manages some of the Covenant Field as VRM Class II. The Richfield Field Office has developed and implemented best maangement practices (BMPs) for visual impacts associated with oil and gas development.	Visual Resources
Kathleen Sgamma	IPAMS	Oil and gas activities should be allowed to proceed in WSAs, since the land can be returned to a pristine enough state after the resources are extracted that the impacts cannot be perceived.	A range of alternatives considered a number of options included permitting oil and gas in non-WSA lands with wilderness characteristics.	Wilderness Study Areas
Kathleen Sgamma	IPAMS	In table A 11-1, Oil and Gas Lease Stipulations, the sage grouse stipulations beginning on page A11-10, the Preferred Alternative specifies a half mile buffer around all sage grouse leks, and a two-mile buffer in Alternatives C and D from March 15 to June 1. These buffers are excessive. Normal practice throughout the Intermountain West is for 0.25 mile buffers around leks, which should be the same in the final RMP.	The commentor's recommendation has been considered within the range of alternatives. The BLM can choose to impose stipulations for animals so that they not be listed under ESA.	Wildlife and Fish
Kathleen Sgamma	IPAMS	In sage grouse brooding habitat, timing limitations would apply from April 1st to July 15th each year. However, the DRMP/EIS should instead specify a buffer around actual nesting habitat, as is common practice throughout the Intermountain West, rather than a blanket restriction for the entire potential habitat. The highest concentration of nesting is within two miles of a lek. The final RMP/EIS should only limit activity within a two mile buffer around leks within potential sage grouse habitat, rather than a blanket timing restriction in areas that may or may not have sage grouse. According to a study(1), two-mile stipulations are effective in protecting nesting and brood-rearing habitat and preserving breeding behavior.	The commentor's recommendation has been considered within the range of alternatives. The BLM can choose to impose stipulations for animals so that they not be listed under ESA.	Wildlife and Fish
Keith Larsen kevwilliams1@ msn.com		I have reviewed the RMS draft and EIS draft and believe the Mayfield White Hills Area should have been considered in the following areas. No indication of, or reference to a botanical inventory having been taken at Mayfield White Hills Area. Chapter 2:28 Table 2-10 Fish and Wildlife Decisions … the Mayfield White Hills is deer and elf range winter and summer. Chapter 2-45 Table 2-16 Special Recreation Management	The RFO conducted a botanical survey of the Mayfield White Hills Area early in 2008. Based upon this survey, the proposed alternative in the PRMP/FEIS would eliminate cross country OHV use for the protection of rare plants.	Help

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Areas … Chapter 2-65 Table 2-17 of the areas listed, the Mayfield White Hills area is the only area within one half mile of a community Chapter 2-73 Table 2-17 Routes where Seasonal Closure are needed to protect deer and elk Chapter 2-137 Impact Summary Table – OHV limited to designated routes on 90% of Richfield field office land area. Chapter 3-96 Areas of Critical Environment Concern 3.5.3.2.3 Rainbow Hills Potential ACEC 2-118 References mule deer, natural systems and special status plant species. Map 2-44 Mayfield White Hills area is the same geological formation and soil type as the Rainbow Hills area Map 3-3 Pinion and juniper exist in Mayfield White Hills area Map 3-6 & 3-7 Mayfield White Hills is deer and elk habitat summer and winter		
Keith Larsen kevwilliams1@ msn.com		I oppose the designation of the Mayfield White Hills as an open play area in favor of a designated route area. A buffer zone is need between the propose land use and private property to minimize the impact to people, livestock and fences. Because of open riding, tracks are being made in every direction on every hill and is visible from the town of Mayfield. The tracks are very ugly and cause erosion during rainstorms. Large mudflows are being created during rain storms. They flood the highway and damage neighboring farms. The soil is heavy clay and if left undisturbed will absorb large amounts of rainwater. Seasonal freeze causes clay to expand and stay loose. This all changes when the clay is compacted from vehicle travel. A hard smooth surface is created, rain water is not absorbed causing large mud flows to erode the ravines flooding the highway and private farm land. UDOT has started to fence their right away to stop motocross bikes from using the highway to climb steep hills. I opposed the Open Area Designation inn favor of a designated route system in the Mayfield White Hills Area. If a cross country and open play is desired it should be out of visual and audible range of private property and populated areas. I own property that boarders the Mayfield White Hills Area for approximately ½ mile the public access to the area is across my property. As a result of what is tolerated in the White Hills Area, the fence has been destroyed for over ¼ mile (burn, cut or knocked down, and gates destroyed or left open). ATV open areas cause disregard for private property. EXAMPLES OF POOR LAND MANAGMENT Motocross track unauthorized on neighboring property. Roads wander to over 50 FT wide. 2 roads to the same area within 300 yards of each other.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Kelly Taylor	Historic Restoration Blue Valley & Old Giles Town	Concerned Input #1 of 8 regarding (roads, ditches, trails) in Sec20, T28So., R10E. SLB&M. Evidence: We own acreage adjacent to this 80 ac. parcel of BLM property. All access to this 80 acres is only available across private property. This 80 acre parcel is isolated from adjoining BLM property on it's only South side access by the cliff's of Steamboat Butte (privately owned). I submit this 80 acre parcel has absolutely zero	Based on the following information, the described parcel of land does not meet the disposal criteria: 1) a segment of the Fremont River runs through the described 80 acre parcel of land, which includes riparian resource values; 2) the land is accessed via an old existing county-maintained road, which has been and is currently highly used by the general public; 3) said public land is located within and between the Blue Bench and Cathedral Allotments and is currently utilized in	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		managability for continued federal ownership. I request it be studied for sale into the private ownership of adjacent landowners. I request this consideration due to the parcel's historic involvement with early pioneers of historic old Giles townsite of 1898. This parcel was the pioneer farm of the Robinson family living there. The historic pioneer irrigation ditchline crosses this parcel. I would like to restore the farm and ditchline as an A.T.V. trail to the historic River diversion damsite.	conjunction with the Bureau's Range program. Livestock trailing occurs between allotments and corralled in an existing corral that is located between the south side of US Highway 24 and the north side of the Fremont River.	
Kelly Taylor	Historic Restoration Blue Valley & Old Giles Town	Concerned input #2 of 8 regarding roads/trails in Sec 24, T28S, R10E, SLB&M. Evidence: We own acreage adjacent to this Historic Old Blue Valley Dugway of 1898. This was hired constructed by our early Wayne Co. Commissioners and was established as the new alignment for the County road between Cainsville and Hanksville. Dugway was constructed by Arthan Chaffin and was use continually until the 1965 Construction of the new Hwy U-24 thru Capitol Reef Nat'l Park following the fremont River Corridor. This Historic Buyway I propose to continue useage over route as an A.T.V. trail as we have for the past 37 years accessing the (3) 1898 a top mesa gravesites and the Historic fremont River irrigation diversion Damsite accesssable from mesa top.	Historically, the entire area managed by the Richfield Field Office has been open to unrestricted OHV use. However, beginning in 1972 with the signing of Executive Order 11644 Use of Off-Road Vehicles on the Public Lands, restrictions began to be implemented to avoid the adverse impacts to soil, vegetation, and other natural and cultural resources. Public awareness of these effects also began to increase. As a result, OHV access into the Blue Valley portions of the public lands in Wayne County is currently restricted to existing roads and trails and will remain so until those effects have been eliminated and measures have been implemented to prevent future recurrence. BLM had no route data in the area identified in the comment. Therefore, this route was not analyzed. Ground truthing and site specific NEPA analysis would need to be completed following RMP completion.	Travel Management – OHV Route Identification
Kelly Taylor	Historic Restoration Blue Valley & Old Giles Town	Concerned input #3 of 8 regarding roads/trails in Sec. 19, T28S., R10E, SLB&M. Evidence: We own private deeded property in Sec 19 being SW1/4 of the NE1/4, there being 5.5 acres of this holding which sits atop the mesa designated the Sky Line Rim. The cliff edge of this rim is also the boundary of the closed & proposed No access emergency closure area. I, however, have private property accessable by no other means than continuing use of the A.T.V. trail we have been using the past 35 years. A county road access is open only so far, to the stock watering reservoir used by Rancher John Jackson of Cainsville, Ut. This 5.5 ac. mesa top is of great importance to me and all landowners in Blue Valley for views & communications equipment towers of phone & internet.	Route WYNC0134 was analyzed to Section 18. No data was available beyond that section. A right-of-way could be applied for to provide access to the private property. Historically, the entire area managed by the Richfield Field Office has been open to unrestricted OHV use. However, beginning in 1972 with the signing of Executive Order 11644 Use of Off-Road Vehicles on the Public Lands, restrictions began to be implemented to avoid the adverse impacts to soil, vegetation, and other natural and cultural resources. Public awareness of these effects also began to increase. As a result, OHV access into the Blue Valley portions of the public lands in Wayne County is currently restricted to existing roads and trails and will remain so until those effects have been eliminated and measures have been implemented to prevent future recurrence. BLM had no route data in the area identified in the comment. Therefore, this route was not analyzed. Ground truthing and site specific NEPA analysis would need to be completed following RMP completion.	Travel Management – OHV Route Identification
Kelly Taylor	Historic Restoration Blue Valley & Old Giles Town	Concerned input #4 of 8 regarding roads/trails in Sec 33, T28S, R10E, SLB&M. Evidence: We being local land owners and A.T.V.'ers for the past 35 years and having ridden these roads and trails continuously for the entire 35 years claim ongoing right of useage to the connector trail which allows access from Lower Blue hills riding area up to the higher sky line rim elevation on which factory Butte sits. There are no other trail access routes between these geographic levels for 5 miles each way. Those being SR U-24 highway & Coal Pits wash roadway which is also proposed to be closed. There are no, none, zero other access trails between lower & upper A.T.V. riding areas. My/our usage of this trail for	Historically, the entire area managed by the Richfield Field Office has been open to unrestricted OHV use. However, beginning in 1972 with the signing of Executive Order 11644 Use of Off-Road Vehicles on the Public Lands, restrictions began to be implemented to avoid the adverse impacts to soil, vegetation, and other natural and cultural resources. Public awareness of these effects also began to increase. As a result, OHV access into the Blue Valley portions of the public lands in Wayne County is currently restricted to existing roads and trails and will remain so until those effects have been eliminated and measures have been implemented to prevent future recurrence. BLM had no route data in the area identified in the comment. Therefore, this route was not	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
		35 years cannot be denied.	analyzed. Ground truthing and site specific NEPA analysis would need to be completed following RMP completion.	
Kelly Taylor	Historic Restoration Blue Valley & Old Giles Town	Concerned input #5 of 8 regarding roads/trails in Sec 24, T28S, R10E, SLB&M (Rge.) Evidence: We being land owners and A.T.V. riders in the Blue Valley ara make claim for continued roads and trails use to access the historic fremont River diversion works constructed by early pioneers of 1883 for open ditch line's (irrigation canals) carrying water from diversion on River 10 miles to the East on both sides of the river for irrigated farm lands. These old ditch lines following a gradual gradient contours are used today and for the past 35 years as A.T.V. trails to see the historic constructed remains of the lives of 116 families who lived, worked and died trying to maintain agriculture livelyhood.	Historically, the entire area managed by the Richfield Field Office has been open to unrestricted OHV use. However, beginning in 1972 with the signing of Executive Order 11644 Use of Off-Road Vehicles on the Public Lands, restrictions began to be implemented to avoid the adverse impacts to soil, vegetation, and other natural and cultural resources. Public awareness of these effects also began to increase. As a result, OHV access into the Blue Valley portions of the public lands in Wayne County is currently restricted to existing roads and trails and will remain so until those effects have been eliminated and measures have been implemented to prevent future recurrence. BLM had no route data in the area identified in the comment. Therefore, this route was not analyzed. Ground truthing and site specific NEPA analysis would need to be completed following RMP completion.	Travel Management – OHV Route Identification
Kelly Taylor	Historic Restoration Blue Valley & Old Giles Town	Concern input #6 of 8 regarding (Historic) roads/trail to access North Cainsville Mesa in Sections 32, T27S., R8E, and in Section 5, T28S, R8E. Evidence: I (we) being land owners in this area (Blue Valley) have been riding A.T.V.'s from Blue Valley Campsite North along lower blue hills up and over the jump off trail (discussed as Concern #4) onto the upper Blue hills accessing the factory Butte County road exiting West at Coal Mine Wash and following the North Cainsville reef road to the jet. (in Sec 32) which leads back over/thru the reef Barrier to a hiking trail head in the SW1/4 of Sec 5 T28So., R8E, this route and trailhead is the one and only access up into the top of North Cainsville Mesa. This route was was funded by Wayne County Funds ($) for dynamite and repairs to the trail for local stockmens stock to access the mesa top. We have had continued use of this trail for the past 35 years for our annual ride/hike atop North Cainsville Mesa. (Now a Wilderness Area)	Routes within the Lower Blue Hills and Factory Butte area have been analyzed and designated consistently with other resource decisions in the RMP. RMP and route decisions made for this area provide for a variety of motorized and non-motorized activities. The North Caineville Mesa ACEC would continue to be closed to OHV use. BLM does not have jurisdiction, nor have we made route designations for State lands (Section 32).	Travel Management – OHV Route Identification
Kelly Taylor	Historic Restoration Blue Valley & Old Giles Town	Concern Input #9 regarding (3) historic graves in Sec 24, T28S, R9E. Evidence: This means hilltop is the historic route of access to and from Blue Valley during early pioneer settlement. The (3) three graves are of young children who died of typhoid fever and were buried alongside the old wagon road just at the top of the historic old Blue Valley Dugway (Territorial Funds) constructed in "1892 - 1905". (Commission minute). These graves are crudly fenced and we have looked after them for 35 years. These graves and the historic Blue Valley dugway are inside the restricted boundary along skyline rim. I propose the BLM consider realignmed of the restricted boundary to exclude #24 section, T28S., R9E. Also exclude See 19, T28So., R10E. Section 24 contains necessary open public access to (1) Wayne County T.V. towers (2) Wayne Co. gravel pit, presently used, (3) old emergency airstrip still use today (4) 3, historic graves 1890's (5) historic Blue Valley diversion damsite (6) Hitoric Blue Valley dugway (7) Historic blue Valley irrigation	Numerous routes were analyzed in the area described in the comment. Route designations were made for consistency with other resource decisions of the RMP.	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
		canal routes.		
Ken Castles	Hoovers Cafe/Winkelman Cabins	You have overlooked trails #74 (Paiute) and trail #21 which give access to Hoovers and Big Rock Candy Mtn. Our businesses need this trails to keep ATV traffic and tourism coming to our resorts.	Paiute Trail 74 was inadvertently left off of maps and has been corrected (PTSR0411). Paiute Trail 21 was not overlooked but is not displayed where it originates on private property.	Travel Management – OHV Route Identification
Ken Salo	Capital Trail Vehicle Association	There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the "603 Process" was completed, the agency was done with its Wilderness review. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSA's, the BLM should have no part in this issue. To do so is a tragic loss of management resources.	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	Non-WSA Lands with Wilderness Characteristics
Ken Salo	Capital Trail Vehicle Association	Our comments document that the current management trend towards massive motorized closures (25 to 75% of the existing routes) is not responsible to the public's needs for motorized access and recreation and is contrary to the multiple-use management directives specified by congress.	The BLM considered a range of alternatives that closed between less than 2% of miles of motorized routes in Alternative N to 28% in Alternative D. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of motorized access and recreation.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	The proposed action must meet the needs of motorized recreationists both today and tomorrow. We respectfully request that the evaluation and proposal be directed to adequately address these issues and goals.	The current and trend of motorized use was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	The project has a critical flaw which is the lack of a true "pro-recreation" alternative that adequately addresses motorized recreation. All of the alternatives developed for consideration represent a significant reduction in routes available for motorized use. Not one Alternative even sustains the current opportunity.	BLM has provided a reasonable range of alternatives. As required by NEPA, the Draft RMP/EIS analyzes the current management (Alternative N). Each alternative, except for Alternative N, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (November 2001 through April 2002) and was further developed throughout the process in coordination with our cooperating agencies and during	Process and Procedures

Commentor	Affiliation	Comment	Comment Summary Response	Category
			the public comment period.	
Ken Salo	Capital Trail Vehicle Association	Therefore, it is incumbent upon the project team to formulate at least one alternative that maximizes motorized recreation, or at least does not reduce motorized recreational opportunities in the planning area. Therefore, we request that the project team formulate a wide range of alternatives including at least one Alternative that maximizes motorized recreational opportunities in the project area.	Alternative N addresses sustaining the current management and opportunities throughout the decision area. This includes managing OHV use on more than 77% of the decision area as open to cross country OHV use with over 98% of the miles of inventoried routes open for OHV use.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed. Ignoring cumulative effects allows the agency to continue to close motorized routes unchecked because the facts are not on the table. CEQ guidance on cumulative effects was developed to prevent just this sort of blatant misuse of NEPA.	Cumulative impacts to motorized recreation opportunities are identified the Draft RMP/EIS Section 4.7.4.1.15, Travel Management.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	The existing level of motorized access and recreation must not be dismissed without adequate consideration because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it.	Alternative N addresses sustaining the current management and opportunities throughout the decision area. This includes managing OHV use on more than 77% of the decision area as open to cross country OHV use with over 98% of the miles of inventoried routes open for OHV use.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	The difference between an RMP (general guidance) and the Travel Plan (implementation decision) is not clearly described in the DEIS. The FEIS should clearly articulate the difference.	As stated on page ES-7 of the Draft RMP/EIS: "Within the limited area designation, inventoried routes would be designated for motorized use or closed. In some cases, designated routes would be closed seasonally or restricted by vehicle size/width. It should be noted that route designations are implementation decisions and that the resulting transportation network could change over time."	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	We are concerned that many of the restrictions in all of the Action Alternatives are simply not justified. The FEIS should clearly draw a connection between the facts on the ground and the decision made.	CEQ regulations implementing the National Environmental Policy Act (NEPA) require agencies evaluating effects on the human environment in an environmental impact statement (EIS) to identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 CFR 1502.22). As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available. Additional information on incomplete or unavailable information can be found in section 4.2.4 of the Draft RMP/EIS.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	Note that the Richland project area includes many important RS 2477 routes. We request that this planning project include adequate research of the county records and adequate formal consultation and coordination with the county to get their input on RS 2477 routes.	The Proposed RMP/Final EIS will not address RS 2477 ROW assertions. Such assertions will be settled administratively on a case-by-case basis or as confirmed through other legal means. See Draft RMP/EIS page 1-10.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	The plan for this project area does not recognize and address this trend. The management plan for the Richland project area must adequately recognize and address this trend. The national planning policy does not recognize and address this trend.	The current and trend of motorized use was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	The agency must develop a true No Action alternative in compliance with NEPA and other planning regulations. The agency must formulate a lawful “No Action” alternative so that the public and decision makers may reasonable compare and contrast other management alternatives.	Alternative N addresses sustaining the current management and opportunities throughout the decision area. This alternative is in compliance with planning regulations, NEPA, and FLPMA.	Process and Procedures

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Under the existing conditions motorized recreationists have a reasonable number of choices and variation of opportunities. Under most proposed conditions, motorized recreationists have a significantly reduced number and variety of opportunities.		
Ken Salo	Capital Trail Vehicle Association	We request the full and fair disclosure of this information to the public. The starting benchmark could be considered deceptive. NEPA requires adequate disclosure of the potential impacts of a proposed action as stated in CEQ Sec. 1500.1 Purpose. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. It shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies shall focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data. Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses. These requirements have not been met. We request that these deficiencies be addressed by developing a starting benchmark alternative that identifies all of the existing roads and trails available to motorized recreationists including non-system routes and those falling under some undefined definition of "unusable" and those additional routes required to meet the needs of the public.	The best available route information was used as a starting point for identifying routes/trails. In addition, to the route inventory, routes identified during the public scoping and public comment period were integrated into the baseline route inventory and will be considered in preparing the Proposed RMP/Final EIS. Maps of the inventory were available for public review during the public comment period. Copies of the maps were available in the Richfield Field Office, at six public meetings, on CD, and on the BLM planning website.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	We request that the environmental document adequately addresses the social, economic, and environmental justice issues associated with multiple-use access and motorized recreation. We request that the environmental document include a travel management alternative for the project area that adequately responds to these issues and the needs for multiple-use access and recreation.	The social, economic, and environmental justice issues are addressed in section 4.6.1 of the Draft RMP/EIS. BLM has provided a reasonable range of alternatives. As required by NEPA, the Draft RMP/EIS analyzes the current management (Alternative N). Each alternative, except for Alternative N, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period (November 2001 through April 2002) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period.	Process and Procedures
Ken Salo	Capital Trail Vehicle Association	The current approach is inequitable because it takes the current motorized route inventory and tries to make it the route inventory for all users. It leaves out possibilities for constructing or otherwise developing non-motorized trails and ignores existing non-motorized trails that exist in both the planning area and adjacent lands.	The route/trail identification process is an implementation level decision. Future implementation level decisions can be made to adjust user types, alignments, or user conflicts.	Recreation
Ken Salo	Capital Trail Vehicle Association	We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.	The route/trail identification process is an implementation level decision. Future implementation level decisions can be made to adjust user types, alignments, or user conflicts.	Recreation
Ken Salo	Capital Trail	Please explain why the needs of non-motorized recreationists are	The range of alternatives provides for a wide selection of motorized and non-	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Vehicle Association	provided for at a much higher level (quality and quantity) than motorized recreationists?	motorized uses for consideration.	
Ken Salo	Capital Trail Vehicle Association	Most of the non-motorized focus areas have designated routes open to motorized vehicles within them. If implemented as written in Alternatives B, C and D, many visitors will perceive these focus areas as establishing blanket restrictions on motorized use. The unintended consequences will likely result in increasing, not reducing actual or perceived "user conflict."	SRMAs managed for a non-motorized experience may have identified routes within them, however these routes are identified to provide access to non-motorized activities within the SRMA.	Recreation
Ken Salo	Capital Trail Vehicle Association	Because vehicles are not permitted to travel off designated routes - for any reason - the Richland BLM is proposing a "vehicle camping only in designated campsites" in the entire Field Office. Such a restrictive policy would be appropriate for National Parks or National Monuments, but for Public Lands this is truly unheard of.	The management suggested within the comment was included within the range of alternatives. Many routes which provide access to campsites have been identified and would be designated routes. Appendix 9 provides criteria to consider the addition of designated routes in future if necessary to better address resources and resource use conflicts.	Recreation
Ken Salo	Capital Trail Vehicle Association	All planning projects should disclose the added benefit to non-motorized recreational resources resulting from the closure of roads by adding the miles of closed roads to the miles of existing non-motorized trails. We request that this procedure be used by this project and all future agency projects. Additionally, we request that the cumulative negative impact on motorized recreationists resulting from this lack of adequate accounting be evaluated and adequately mitigated.	The impacts requested by the commentor are already contained in the Draft RMP/EIS chapter 4 under Section 4.4.3, Impacts to Recreation.	Recreation
Ken Salo	Capital Trail Vehicle Association	The different management plans being developed by the BLM and Forest Service are using generated, estimated and inadequate data to forward an agenda of eliminating access and motorized recreation from public lands. The economic impact of these closures will be devastating to small communities throughout the West. Models can be manipulated to predict any result. Economic models such as Implan should not be used when the input data is estimated and not factual or actual. Adequate effort must be exercised by the agencies to gather true on the ground data from businesses and individuals that use our public lands. We request that the economic analysis use actual local data to determine the true economic and social impact of proposed motorized access and closures on the public.	The commentor's assertion in the first sentence is not true. BLM's preferred alternative accommodates substantial opportunities for motorized recreation on public lands. The comment provides no data to support the assertion of "devastating" impacts. Little local data suitable for determining economic and social impacts is available. BLM made use of trail usage data in section 3.4.4.1. However translating this data into economic impacts is not possible because the data does not differentiate local and non-local usage. This difference is fundamental to estimating economic impacts. Development of new "on the ground data" is beyond the scope of the DRMP/DEIS process.	Socioeconomics
Ken Salo	Capital Trail Vehicle Association	We request adequate evaluation of the economic and social impacts of this proposed action be considered in the analysis and decision-making. Additionally, we request that the cumulative negative impact resulting from inadequate evaluation of economic and social impacts in past actions are considered in the analysis and decision-making and that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.	BLM reviewed available data and conducted socioeconomic analysis according to best practices. BLM believes that social and economic impacts have been adequately considered. The comment does not provide specifics on the past impacts of concern. Many changes in social and economic conditions have occurred due to larger social and economic trends in the area and region, rather than BLM decisions. Further, mitigating past negative impacts, to the extent any such impacts are due to past BLM decisions as opposed to larger social and economic trends, is not within the scope of this RMP/EIS.	Socioeconomics
Ken Salo	Capital Trail Vehicle Association	The site specific analysis of each road or trail to be closed must address or identify where the public would go to replace the motorized resource proposed for closure. In other words, the analysis must adequately	See section 4.7.4.1.15 which discusses past, present and reasonably foreseeable future actions as well as cumulative impacts.	Travel Management – OHV Route

Commentor	Affiliation	Comment	Comment Summary Response	Category
		evaluate the site specific value of a road or trail proposed for closure to motorized recreationists. It must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing. An incomplete analysis is not acceptable under NEPA requirements.		Identification
Ken Salo	Capital Trail Vehicle Association	Note that some new construction may be required to accomplish a reasonable system of loops. Therefore, new construction must be included in the scope of the project.	New construction of routes is beyond the scope of the Draft RMP EIS. Site specific NEPA analysis for new construction would be required on a case-by-case basis.	Travel Management – OHV Route Identification
Ken Salo	Capital Trail Vehicle Association	We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision.	A variety of data sources were utilized in developing the route inventory. Criteria was set and ID Team meetings were held to analyze individual routes. An appendix was added to the Final RMP EIS that describes the process used for route designations.	Travel Management – OHV Route Identification
Ken Salo	Capital Trail Vehicle Association	The maps and figures are not easily understood. There are no identifiable or named features and no road and trail numbers on the maps. It is very difficult for the public to orient themselves and to interpret the proposed action for each specific road and trail. Therefore, the public cannot adequately evaluate the proposal and cannot develop comments with reference to specific roads and trails.	BLM has provided detailed maps within the document. Maps of finer detail can be accessed at the RFO reading room. Maps were created to differentiate the designation of the route, not the route classification.	Travel Management – OHV Route Identification
Kent Gilbert kentg@emerytelcom.net		Will Cainville be lost forever as a MX spot? Did the BLM take inventory of single track prior to closure? Currently offer “200 miles of designated routes that offers challenges to all level of skill riders”. Only if you find driving a car challenging! Who else uses the land as well as Motocrossers? If Cainville does not stay completely open we may lose the greatest spot to ride motorcycles on earth.	Maps were created to differentiate the designation of the route, not the route classification. This level of detail is not appropriate for the level of planning within the Draft RMP EIS. There are routes identified for 50" or less for OHV use which will be discussed in implementation level planning. Single track trails were not inventoried in the initial route inventory. The commentor lacks specificity to make any individual route evaluations. Route designations are an implementation level decision subject to change. Maps of finer detail can be accessed at the RFO reading room.	Travel Management – OHV Area Categories
Kent Grover kfgrover@xmission.com		Please avoid creating any artificial wilderness with the WC designation. Land should not be managed like wilderness unless it is designated such by Congress.	BLM’s authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM’s organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary’s authority to manage lands as necessary to “achieve integrated consideration of physical, biological, economic, and other sciences.” FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . .” FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	
Kent Grover kfgrover@xmission.com		In my opinion Special Recreation Permits as described are excessively restrictive. Club outings should be encouraged rather than being discouraged, because they provide training, education, and peer pressure to "Stay on the trail". We sometimes have as many as 20 vehicles on our outings, and feel it is counterproductive for you to set numerical limits that discourage our outings, most of which are 1-day activities.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Kent Grover kfgrover@xmission.com		I live in Lehi, Utah, and am an outdoor enthusiast, primarily getting around this beautiful state in my Jeep. I enjoy going into the back country and actively seek out challenging trails and beautiful scenery. Whenever possible I take family members or other passengers, and I frequently travel with the Lone Peak 4-Wheelers jeeping club. I am a member of the Trail Patrol and frequently volunteer my time for trail maintenance and clean-up. I feel it is very important that we have adequate motorized vehicle recreation opportunities throughout Utah, and in particular in the Richfield area. I am supportive of the insight and comments provided by the Utah 4 Wheel Drive Association, and am in agreement with their recommendations. I prefer Alternative B with some minor revisions, as I recognize that some changes are needed. I would ask that you not close any existing routes within the SRMAs that are proposed in Alternative B. I also ask that any SMRAs have emphasis on motorized recreation, including additional camping and OHV travel opportunities.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Kent Grover kfgrover@xmission.com		Alternative B is missing some historically accessed routes. The Utah 4 Wheel Drive Association (U4WDA) has brought all of these routes to your attention. I believe they should be added to Alternative B as open motorized routes. I also believe that the BLM should recognize the RS2477 road claims that are part of Sanpete, Sevier, Piute, Garfield and Wayne County Transportation Plans. The validity of these claims should be determined before a final decision is made in this RMP. I believe these counties should be consulted regarding all road decisions prior to finalizing the RMP. I believe that the following routes should remain open to motorized access and amended to Alternative B: Trail Name or Location Located on Map: ---------- ---------- Sams Mesa Routes Dirty Devil 100k Happy Canyon Route Dirty Devil 100k Spur Route @ T31S-R15E Dirty Devil 100k Connector road east of Bicknell	As specified in the Draft RMP/DEIS (pg. 1-10), addressing RS 2477 assertions is 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. Data available for routes on Sam's Mesa was analyzed and designated as open or open to 50" or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed within Happy Canyon for consistency with other resource decisions of the RMP. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the preferred alternative. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Fremont George 100k Muddy Creek Route @ T27S-R10E Hanksville 100k Spur route @ T27S-R8E Hanksville 100k Wood Bench Spur Route Hanksville 100k North Pinto Hills Route Hanksville 100k Angel Cove Route Hanksville 100k Connector roads @ T27S-R3W Sevier River Central 100k Miners Park spur routes Sevier River South 100k Connector Route @ T27S-R3W: Sevier River South 100k Please resist the temptation to close routes because they get little use or because they need maintenance for average motor vehicular access. It is important that marginal and "impassible" routes be kept open for those with interest and modified vehicles such as myself who are constantly looking for more challenging routes. Thank you for your interest in providing accessible, enforceable, and maintainable access to our public lands.	is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns. T.27 S., R.8 E., spur route Comment lacked specificity to identify Wood Bench Spur Route. Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) were reassessed. WYNC0017 and 0018 were designated for Administrative Use Only due to resource concerns. Insufficient data was available on route #WYNC0017A. If there is a purpose and need for this route in the future, inventory data would need to be gathered and analyzed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the preferred alternative (PTSR0201).	
Kent Grover kfgrover@xmission.com		I am opposed to any additional route closures in currently designated Wilderness Study Areas, including routes that border and provide access to those areas. I ask that the BLM allow vehicles access to campsites on existing spur roads within 300 feet of the designated routes.	A range of alternatives considered a number of options for the inventoried ways in WSAs. The IMP precludes motorized access within 300 feet of the designated routes within WSAs.	Wilderness Study Areas
Kevin Arrington	Paiute ATV Trail Committee	The open riding areas were not shown on the maps provided to the public in the public meetings. The only map showing these areas was so small it was impossible to determine and understand the boundaries of these areas. Therefore it is impossible to expect meaningful comment from the public without providing adequate information to base comments upon.	BLM has provided detailed maps within the document. Maps of finer detail can be accessed at the RFO reading room. Maps were created to differentiate the designation of the route, not the route classification.	Maps
Kevin Arrington	Paiute ATV Trail Committee	The RMP describes thousands of acres of closed areas but the maps provided to the public did no show these areas and their respective boundaries. How could the public effectively comment on the closed areas without being provided maps showing the closed areas.	BLM has provided detailed maps within the document. Maps of finer detail can be accessed at the RFO reading room. Maps were created to differentiate the designation of the route, not the route classification.	Maps
Kevin Arrington	Paiute ATV Trail Committee	The maps should show Open, Limited access, and closed areas, without giving the public this information it is impossible to expect meaningful comments from the public. The maps did not effecively differentiate between limited width trails and standard width trails. How can the public effectively comment on the routes if they are not shown as limited width vs. standard width.	BLM has provided detailed maps within the document. Maps of finer detail can be accessed at the RFO reading room. Maps were created to differentiate the designation of the route, not the route classification.	Maps
Kevin Arrington	Paiute ATV Trail Committee	Land sale proposals are described, but only a single small map of the entire district was shown to the public. How can the public effectively comment on land disposal issues if no map showing their respective acreage and boundaries was available to the public.	The RMP EIS has a total of five maps showing disposal areas divided into manageable areas to show appropriate detail and information. Any map of a larger geographical scale would not show the disposal areas accurately.	Maps
Kevin Arrington	Paiute ATV Trail	The Area indicated by the boundry and highlighted in Light Green should be designated as an Open Riding Area. This region has been heavily	Poverty Flat Area. The area described in the comment was addressed within Alternative N of the Draft RMP/EIS but was not selected to be carried forward as	Travel Management –

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Committee	mined and consists of many many roads and trails. The Marysvale area is heavily trafficked by OHV and desperately needs a designated Open Riding Area. This area is secluded from view from US Highway 89, cannot be seen from Marysvale or any other communities in the area and cannot be seen from popular viewpoints on either the east or west side of Marysvale including Monroe Peak. Marysvale has the largest concentration of riders on the Paiute Trail system. Currently there is no open riding area. A designated open riding are should be created. The OHV community desires open riding areas and currently there are none in the Paiute Trail system area. This open riding area can be expect to reduce the impact on other designated trails in the area. This Area spans the Marysvale Quad map and the Antelope Range Quad Map and the Mount Brigham Quad. See the included highlighted areas on the Antelope Range Quadand Mount Brigham Quad. This Area consists of RW4, TS26S Sections 9, 10, 11, 12, 13, 14, 15, 16, 21, 22, 23, 24, 25, 26, 27, 28 R3W TS27 S Sections 1, 2, 3, 4, 5, 8 (west of river) 9, 10, 11. Not all of each section is required. Some sections are only partially used as indicated in the map shading. A small portion of the boundry does enter the US forest near RW3 TS27S Sect 3 and could be excluded provided the trail on the eastern and southern end of SESR0085 and PTSR0348 through the Forest remains open.	an open riding area for consistency with other resource decisions.	OHV Area Categories
Kevin Arrington	Paiute ATV Trail Committee	Specific suggestions for Alternative B trails: Angle - Leave Trail PTGV0014 open because it connects to PTGV0013a for recreational purposes. Angle - PTGV007 Connects to PTGV0007a and PTGV005d which is not shown on the map and should. All these routes should remain open for recreation, wood products gathering and cattle management. Angle - PTGV007A continues north through Sections 29 and 20 which is not shown on the map and should be and should remain open. Angle - PTGV0005 and PTGV0005D should remain open as it loops back to PTGV007 and PTGV007A. These routes should remain open for recreation, wood products gathering and cattle management. Angle - Because PTGV0013 has been physically closed, PTGV0013A should remain open seasonally for recreational purposes. Water Creek Canyon - Designated Paiute Trail 40 is not shown on the maps. It has a right of way south of SESR0318 in section 12. Phonolite Hill - PTGV0029A and PTGV0047 Should be open annually. These are low country trails and should remain open. These are Paiute Trail #73 and 61 and should remain open. Marysvale - PTSR0564 should remain open as it connects PTSR396 with PTSR0538. Mt. Brigham - PTSR0425 should remain open for mining and recreational access. Mt. Brigham - PTSR0189 should remain open to PTSR0188 to retain access to PTSR0188 which is shown as open. Mt. Brigham - In section 25 route from PTSR0185 to PTSR0190 is showing open through private land and	PTGV0014 to PTGV0013a – This error was corrected. PTGV0014 was confused with PTGV0013. PTGV0014 was corrected to be open and connect with PTGV0013a. Portions of PTGV0014 have been designated as 50" or less for safety and resource concerns. PTGV0013 is physically closed on BLM lands. (On maps it appeared that the commentor had confused PTGV0005A as PTGV0005D). PTGV0005a – GPS data was not available to connect PTGV0005a to PTGV0007. This route would need to be analyzed in the future, following collection of additional data. PTGV0007 - Connector route between PTGV0007 and 0007a was GPS'd in the inventory but inadvertently missing from the published maps. PTGV0007 has been extended to connect with 0007a. Paiute Trail #40 was being constructed during BLM inventory meetings. It was addressed as Route SESR0317 but data was not shown on DRMP route maps. This has been resolved. PTGV0029A and PTGV0047 (Piute Trail #73 and 61) are limited by size, 50" or less with no seasonal restrictions. PTSR0564 was originally identified as abandoned, but GPS data notations did not verify that and the route is obvious on the ground utilizing NAIPs data. This error was resolved. PTSR0425 was analyzed and determined to be abandoned and naturally rehabilitating. PTSR0189 begins on private property. The BLM route was analyzed and closed due to erosion. This closed designation would affect or apply to the private lands. PTSR0185 to PTSR0190 - PTSR0185 is shown on our data as a County maintained route. The private property owner would need to address this issue with the County. PTSR0005 has been identified as open.	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
		BLM, this route is closed at the private land boundary on the north and should be marked as closed. Mt. Brigham - PTSR0005 should remain open as it is a connector route and is used for cattle management and recreation. Antelope Range - SESR0098 should remain open for public access, recreational opportunities. Water Creek Canyon - SESR0316 is mostly on state lands and is a connector route with SESR381 and should remain open. This is heavily used by the public. Marysvale - Designated Paiute Side Trail 74 along the Railroad Grade to PTSR0411A and PTSR0412 (Paiute Side Trail 22) is not shown on the maps. It should be shown and remain open. Marysvale - PTSR0305 and PTSR0304 is a county road and should remain open. Marysvale - PTSR0345 shows a closed section in the middle of the route, this should remain open, possibly a mapping error. Marysvale - PTSR0580 Beginning on forest is open, closing it eliminates a loop to PTSR0584, this should remain open. Marysvale - PTSR0318 Should remain open as it is a connecting route to PTSR0319 and PTSR0311 and PTSR0320. Marysvale - PTSR0261 should remain open to allow access to PTSR0263 and PTSR0262 for recreational opportunities and cattle management. Marysvale Peak - PTSR0263 is open on the Forest Service route designation maps and shows closed to the edge of the forest. Mt. Brigham - Should connect PTSR0062 with PTSR0050. The trail from the end of trail 76 along the freeway, corssing under the freeway near joseph and joinin the Paiute ATV designated side trail 22 is not shown on the maps, this trail should be on the maps and should be desigated.	SESR0098 was analyzed and identified by specialists for closure. SESR0316 was reviewed and identified as access to State Lands and other routes. This has been adjusted as open. Paiute Trail 74 was inadvertently left off of maps and has been corrected (PTSR0411). PTSR0305 has been physically closed by a fence and berms. It was re-analyzed and would remain closed. PTSR0304 was analyzed and was identified as open. PTSR0345 was a mapping error, was corrected. PTSR0580 was reassessed and identified as open for consistency with FS and to create loop. PTSR0318 was analyzed within the range of alternatives and was identified for closure to consolidate routes and prevent habitat fragmentation. PTSR0261 was reassessed and identified as open with seasonal limitations for consistency with other FS and BLM route designations. PTSR0263 is not identified onto the FS lands, it has been analyzed by BLM as open with seasonal limitations. No data was available and for safety and resources protection no route has been identified to connect PTSR0062 with PTSR0050. Paiute Trail 76 to 22 is not on BLM public lands.	
Kevin Holdsworth kholdswo@wwcc.wy.edu		We have owned property in WayneCountyfor over twenty years. We are very interested in the management plan currently open to public comment. We would urge the agency to change its preferred alternative to “D.” We have a great many concerns with the preferred alternative “B.” To be entirely frank, this management plan seems hurried and incomplete. Much more work needs to be done to make it a workable and viable plan. Comments from other agencies, citizens and interest groups need to be more fully incorporated into the document. We understand the pressure from Washingtonto get this plan approved before the current administration leaves office. This hurry, however, is not in keeping with the best interests of the public. Therefore, we urge you to take more time to develop a more complete, inclusive and careful document. We also urge you to adopt alternative D, or a similar least-action alternative, as the agency’s preferred one.	The BLM started working on the RMP 7 years ago in 2001 using the best available information. The PRMP/FEIS resulted from public involvement and the gathering of the best available information. The BLM had posted a Notice of Intent (NOI) in the Federal Register to initiate the scoping phase of the planning process on November 1, 2001. Citizens and groups submitted comments from November 2001-April 2002, helping the BLM identify the issues addressed during this planning process. Based on both agency expertise, and issues raised by the public the BLM prepared a Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS) with a full description of the affected environment, a reasonable range of alternatives, and an analysis of the impacts of each alternative. The BLM posted the Notice of Availability (NOA) of the DRMP/DEIS on October 26, 2007. The public submitted comments on the DRMP/DEIS from October 2007-January 2008. Based on comments on the DRMP/DEIS and internal review, the BLM wrote the PRMP/FEIS including the Proposed Plan. The range of alternatives includes consideration of additional ACECs as well as management actions in accordance with FLPMA.	Adequacy of Analysis and Alternatives
Kevin Holdsworth		Alternative B: --Does not do enough to protect the unparalleled vistas throughout the affected area, including, of course, not just BLM land, but	The Draft RMP/EIS considers a range of alternatives.	Visual Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
kholdswo@wwcc.wy.edu		nearby national parks, national forests, and other areas of world-class landscapes.		
Kiel Denwick	U4WAA	I believe that having a special rec permit limit of 10 vehicles is not very appropriate as it doesn't allow family groups and small clubs to enjoy the outdoors.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Kiel Denwick	U4WAA	I find that if you limit motorized access to camsite to 150 feet instead of the previous 300 feet it will cut way down on the existing camp site thus making trail widening a good possibility.	The management suggested within the comment was included within the range of alternatives. Many routes which provide access to campsites have been identified and would be designated routes. Appendix 9 provides criteria to consider the addition of designated routes in future if necessary to better address resources and resource use conflicts.	Recreation
Kiel Denwick	U4WAA	After reviewing all the area maps for the closed roads several roads are left off including some roads that I have had the priveledge to driving like Angel Cove Route, Happy Canyon Route. Plus Miners Park Spur Routes.	Data available for routes on Sam's Mesa was analyzed and designated as open or open to 50" or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed within Happy Canyon for consistency with other resource decisions of the RMP. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the preferred alternative. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns. T.27 S., R.8 E., spur route Comment lacked specificity to identify Wood Bench Spur Route. Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) were reassessed. WYNC0017 and 0018 were designated for Administrative Use Only due to resource concerns. Insufficient data was available on route #WYNC0017A. If there is a purpose and need for this route in the future, inventory data would need to be gathered and analyzed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the preferred alternative (PTSR0201).	Travel Management – OHV Route Identification
Kurt Becker suwa@suwa.org		The plan clearly favors loud and damaging gasoline-powered recreation over all other forms such as hiking, camping, equestrian. A more suitable plan is one that provides true open space - areas where one can get miles away from a road.	The range of alternatives provides for a wide selection of motorized and non-motorized uses for consideration.	Recreation
Kurt Williams	U4WDA	We do not believe that group sizes should be limited to 10 vehicles	The RFO established the group numbers in consultation with other agencies for	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		under the proposed Criteria for Special Recreation Permit. This number in our opinion is vastly unrealistic and makes group events such as club trail rides, large family picnics or scouting events impossible. In addition, we do not believe an SRP should be required to recreate in a single area for two or more hours, not only would this be difficult/impossible to enforce, it just isn't practical. We also believe the rules and authorized exceptions for theses SRP's should be clarified and added to the final decision. Reference: Table 2-16, Page 2-62.	the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	
Kurt Williams	U4WDA	We believe the BLM should allow vehicles to access campsites via existing spur roads within 300 feet of the designated routes. The proposed change to 150 feet will limit the amount of available campsites throughout the field office. We believe this will lead to crowding and over-use in the campsites that do fall within the 150 ft. designation. Reference: Table 2-17, Page 2-74.	The management suggested within the comment was included within the range of alternatives. Many routes which provide access to campsites have been identified and would be designated routes. Appendix 9 provides criteria to consider the addition of designated routes in future if necessary to better address resources and resource use conflicts.	Recreation
Kurt Williams	U4WDA	We believe that Alternative B is missing some historically accessed routes. We believe they should be added to Alternative B as open motorized routes. Trail Name or Location: Sams Mesa Routes, Location on Map: Dirty Devil 100k. Trail Name or Location: Happy Canyon Route, Location on Map: Dirty Devil 100k. Trail Name or Location: Spur Route @ T31S-R15E, Location on Map: Dirty Devil 100k. Trail Name or Location: Connector road east of Bicknell, Location on Map: Fremont George 100k. Trail Name or Location: Muddy Creek Route @ T27S-R10E, Location on Map: Hanksville 100k. Trail Name or Location: Spur route @ T27S-R8E, Location on Map: Hanksville 100k. Trail Name or Location: Wood Bench Spur Route, Located on Map: Hanksville 100k. Trail Name or Location: North Pinto Hills Route, Located on Map: Hanksville 100k. Trail Name or Location: Angel Cove Route, Located on Map: Hanksville 100k. Trail Name or Location: Connector roads @ T27S-R3W, Located on Map: Sevier River Central 100k. Trail Name or Location: Miners Park spur routes, Located on Map: Sevier River South 100k. Trail Name or Location: Connector Route @ T27S-R3W, Located on Map: Sevier River South 100k	Data available for routes on Sam's Mesa was analyzed and designated as open or open to 50" or less depending on what was appropriate for the current conditions of these routes. Happy Canyon routes were analyzed and closed within Happy Canyon for consistency with other resource decisions of the RMP. T.31 S., R.15 E., Spur Route Connector road east of Bicknell - The comment lacked specificity, however, there are two routes in this area which have been addressed. Route WYPM0424 is a connector route from Bicknell to the Great Western Trail and has been identified for designation in the preferred alternative. Route WYPM 0422 by Sunglow Campground has been analyzed and identified as closed to OHV. This route connects with a FS trail and is open to equestrian and hiking use only. Numerous routes were analyzed near Muddy Creek in T.27 S., R.10 E. Some of these routes were closed due to other resource concerns. T.27 S., R.8 E., spur route Comment lacked specificity to identify Wood Bench Spur Route. Routes have been identified and designated in this area according to route designation criteria. North Pinto Hills routes (WYNC0017, 17a, 18) were reassessed. WYNC0017 and 0018 were designated for Administrative Use Only due to resource concerns. Insufficient data was available on route #WYNC0017A. If there is a purpose and need for this route in the future, inventory data would need to be gathered and analyzed. The trail to Angel Cove is a non-motorized route within a WSA. Motorized routes have been designated to access the trail heads for the non-motorized use. The non-motorized section has been removed from the motorized route designation map. T.27 S., R.3 W., connector - Many routes were analyzed within this township. Unable to address due to lack of specificity. Miners Park Spur - The comment lacked specificity. The Paiute ATV Route #77 occurs in this area and has been identified for designation in the preferred alternative (PTSR0201).	Travel Management – OHV Route Identification
Larry Svoboda	U.S. EPA	we believe damage to soils, vegetation, cultural and paleontological resources, scenic quality, riparian, aquatic and/or other important resources should be more fully disclosed, and site-specific mitigation	The DRMP/DEIS Chapter 4 discloses OHV impacts to vegetation, cultural resources, paleontological resources, scenic quality, riparian, aquatic and other important resources. Site specific mitigation measures will be addressed at the	Adequacy of Analysis and Alternatives

Commentor	Affiliation	Comment	Comment Summary Response	Category
		measures (i.e., signage, fencing and other barriers) be proposed in the FEIS to ensure these resources are restored and protected. Such disclosure and mitigation is particularly important for other heavily used areas proposed to remain open for OHV travel under Alternative B: 1) Big Rocks Trials Area (270 acres) which provides trials motorcycle/rock crawling recreational opportunities; 2) Glenwood Play Area (3,300 acres) to be managed as a community OHV area; 3) Aurora Play Area (310 acres) to be managed as a community OHV area; and 4) Mayfield Open Area (1,900 acres) to be managed as a community OHV play area.	activity level planning during implementation. The RFO conducted a botanical survey of the Mayfield White Hills Area early in 2008. Based upon this survey, the proposed alternative in the PRMP/FEIS would eliminate cross country OHV use for the protection of rare plants.	
Larry Svoboda	U.S. EPA	The DRAFT RMP/EIS does not describe nor calculate the projected concentrations for any of the alternatives. We recommend that BLM disclose projected National Ambient Air Quality Standard (NAAQS) and visibility pollutant concentrations in the Final EIS (FEIS).	BLM's draft air resources guidance states that quantitative dispersion modeling is inappropriate in the absence of detailed emission data, especially source location information. BLM would consider dispersion modeling for project-specific EIS associated with a proposed project.	Air Quality
Larry Svoboda	U.S. EPA	The results of the semi-quantitative analysis omit potential impacts to ozone, visibility, or deposition. The planning area encompasses the Class I area of Capital Reef National Park which requires special protection of air-quality related values. Also, adjacent to or near the RFOPA are the Class I areas of Bryce Canyon and Canyonlands National Parks. Ozone may be of particular concern because of the potential emissions of volatile organic compounds and oxides of nitrogen from sources in the planning, including oil and gas development (e.g., the new Wolverine Field).	Thank you for your interest in Utah's air resources. Please see the revised air quality impact analysis section of chapter 4 of the PRMP/FEIS.	Air Quality
Larry Svoboda	U.S. EPA	it is important to assign future responsibility for project-specific air quality analyses. We recommend that the FEIS contain wording similar to the following excerpt from the Rawlins, Wyoming Draft RMP/EIS, which used a comparative, emissions-based approach: As project-specific developments are proposed, quantitative air quality analysis would be conducted for project specific assessments performed pursuant to NEPA.	Please see the revised air quality impact analysis section of chapter 4 of the PRMP/FEIS. BLM has added this language as suggested.	Air Quality
Larry Svoboda	U.S. EPA	Additional disclosure is needed on the resource values associated many of the ACECs being considered for designation to clearly demonstrate whether or not special management attention is warranted to protect and prevent irreparable damage to relevant and important historic, cultural and scenic values; fish, wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards.	Information associated with the process used for evaluating nominations for ACEC is included in the Draft RMP/EIS in Appendix 1. Full documenation of the process is included in the ACEC Evaluation Report, Richfield Resource Management Plan, January 2005. This report was made available to the public, and is readily available for viewing by the public at Richfield Field Office and on the Richfield RMP planning website.	Areas of Critical Environmental Concern
Larry Svoboda	U.S. EPA	For example, we recommend designation of a portion of the new Badlands Potential Research Natural Area in/around Factory Butte given the resource damage that has occurred, and could continue to occur, from open OHV travel. However, a more complete discussion on the relevance and importance of the scenic, special status species, natural processes, riparian, and relict vegetation values associated with this ACEC is needed in the FEIS.	Information associated with the process used for evaluating nominations for ACEC is included in the Draft RMP/EIS in Appendix 1. Full documenation of the process is included in the ACEC Evaluation Report, Richfield Resource Management Plan, January 2005. This report was made available to the public, and is readily available for viewing by the public at Richfield Field Office and on the Richfield RMP planning website.	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
Larry Svoboda	U.S. EPA	Parker Mountain ACEC: this new ACEC would provide needed special management attention to protect and prevent irreparable damage to a number of important resource values including sagebrush steppe, sage grouse, Utah prairie dog, and Pygmy rabbits habitats in/around the 270 acre Big Rocks Trials Area.	The sagebrush-steppe habitat was one of the resources found to be relevant and important for the potential Parker Mountain ACEC.	Areas of Critical Environmental Concern
Larry Svoboda	U.S. EPA	Rainbow Hills ACEC: this new ACEC would provide needed special management attention to protect and prevent irreparable damage to a number of important resource values including mule deer habitat, natural systems,and special status species (i.e., Utah phacelia, Arapien stickleaf, Wards penstemon, rainbow rabbitbrush, Sigurd townsendia, and Glenwood milkvetch) in/around the 3,300 acre Glenwood Play Area.	This area was considered in the range of alternatives and is available for the decisionmaker to consider in developing the Proposed RMP and ROD.	Areas of Critical Environmental Concern
Larry Svoboda	U.S. EPA	We also recommend that: 1) dispersed camping activities be closely monitored in this area for additional impacts to these threatened cacti;	Monitoring impacts to endangered species is a requirement under both FLPMA and the Endangered Species Act. This will be accomplished according to monitoring plans developed in coordination with the USFWS.	Recreation
Larry Svoboda	U.S. EPA	We also support the BLM's preferred method of managing community OHV play areas and the Paiute Trail System through partnering with local, county, and state, and federal agencies, and recommend that the BLM promote collection of user fees through these agencies if additional resources are needed in order to restore, maintain, and protect cultural and natural resources that have been or may be impacted.	The ability to collect fees is regulated by Federal Lands Recreation Enhancement Act (FLREA) and is outside the scope of this NEPA process. Protection of cultural resources is provided by NHPA and ARPA. Protection of natural resources is provided by FLPMA and EO 11644 and EO 11989.	Recreation
Larry Svoboda	U.S. EPA	we recommend that, in collaboration with its local partners,BLM maintain a credible field presence for promoting and monitoring recreational user compliance by hiring seasonal (spring through fall) field technicians to: 1) inform OHV and other recreational users of the management prescriptions in place; 2)construct signage and fencing or other barriers to prevent further impacts; 3) promptly remediate any new impacts to further discourage land use violations; and 4) document and report violations to BLM enforcement officers for ticketing.	Allocation of budgets is outside the scope of this NEPA document.	Recreation
Larry Svoboda	U.S. EPA	The Draft RMP/EIS makes no specific mention of carbon dioxide (C02) as a greenhouse gas that would be emitted from various sources in the planning area and does not generally address potential effects on climate change. The Final RMP/EIS should include information on these effects from fires and other sources (e.g., oil and gas development).	While uncertainties remain about global warming and climate change, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.	Scope of Document
Larry Svoboda	U.S. EPA	EPA is concerned that the BLM will be unable to adequately control and mitigate ongoing and future impacts to cultural, paleontological, riparian, visual, soil, vegetation, rare plant and animal species, and other unique and valuable resources in/around these open OHV travel areas as proposed under Alternative B. Our detailed comments recommend actions (e.g., special designations) EPA believes are needed to	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. Enforcement and fines are beyond the scope of this document.	Travel Management – OHV Area Categories

Commentor	Affiliation	Comment	Comment Summary Response	Category
		successfully address these impacts.		
Larry Svoboda	U.S. EPA	In the open OHV travel area in/around Factory Butte where significant resource damage has occurred, we also commend the BLM for closing off areas to protect-threatened and endangered plant species including the Wright Fishhook and Winkler cacti. In order to provide long-term protection of these resources, we recommend that open OHV travel be limited to the area that includes most of the Mancos shale badlands in/around Swing Arm City by continuing to restrict OHV travel to designated routes.	The Factory Butte emergency closure order is independent of and outside the scope of this RMP planning process. Further, the BLM has no duty to obtain input from the public prior to issuing a restriction order under the 43 CFR. Threats to threatened and endangered species in the Factory Butte area were first identified as an issue in the 1982 Henry Mountains MFP. Protection of threatened and endangered species in the Factory Butte area has been a management issue ever since and has been carried forward as a management issue in the RMP process by BLM staff.	Travel Management – OHV Area Categories
Larry Svoboda	U.S. EPA	It is our understanding that decisions on designating travel routes throughout the RFOPA proposed in the various Alternatives was the result of a collaborative effort involving a number of stakeholders, including local land owners and county governments. However, we could not find information in the Draft RMP/EIS specifically describing the process that BLM used to date in deciding which travel routes to formally designate. Given the sensitivity around this issue, we recommend that BLM disclose this process in the FEIS in the interest of all stakeholders. We suggest the RFO consider disclosure through an appendix, similar to how the BLM's Moab Office provided this information in its Draft RMP/EIS (see Appendix G entitled "Travel Plan Development").	A variety of data sources were utilized in developing the route inventory. Criteria was set and ID Team meetings were held to analyze individual routes. An appendix was added to the Final RMP EIS that describes the process used for route designations.	Travel Management – OHV Route Identification
Larry Svoboda	U.S. EPA	2) that a portion of this area immediately adjacent to the Capitol Reef Country Scenic Byway on Utah Highway 24 be reclassified from VRM Class IV to III to help protect important visual resources for other users (e.g. scenic drivers and photographers).	The suggested management is contained within the range of alterantives for the decisionmaker to consider in developing the Proposed RMP and ROD.	Visual Resources
Laura Romin	U.S. Fish & Wildlife Service	Page 3-73, 3.1.5.1.2 We recommend the RFO pursue acquisition of State-owned lands near North Caineville and South Caineville mesas, Hartnet draw, and Caineville wash. This would provide for consistency in land management relative to recreational land use planning and endangered plant conservation.	The RFO may consider the commentor's recommendation when considering future land acquisitions "to acquire access to public lands and protect important resources."	Lands and Realty
Laura Romin	U.S. Fish & Wildlife Service	Map 2-24, Map 2-25, Table A5-4, Chapter 2 Maps - Some sale parcels are near known listed or sensitive plant species habitat (WN-02, WN-03, WN-17, WN-05, WN-22, WN-23, and WN-24). We recommend that suitable habitat on these sale parcels be surveyed prior to any disposal, and retained in federal ownership if they provide important habitats.	In Table 2-18 of the Draft RMP-EIS, the last bullet of the desired outcomes identifies the initial criteria used to identify the parcels for sale. This bullet has been modified in the Final EIS to further clarify BLM's preliminary review process. Additional site-specific inventories would be completed in the NEPA analysis and decision-making process, at which time resources may be identified that would preclude disposal suitability. If determined suitable for disposal, publication notices would be sent to federal, state, local governments and interested parties to provide opportunity for coordination regarding land tenure adjustment actions.	Lands and Realty
Laura Romin	U.S. Fish & Wildlife Service	Map 2-29, Chapter 2 Maps, We recommend that the Notom road corridor be designated a ROW Exclusion Area to protect sensitive plant habitat.	This area was proposed as an avoidance area in Alternatives C and D (Maps 2-32 and 2-33) and analyzed in the range of alternatives.	Lands and Realty
Laura Romin	U.S. Fish & Wildlife	Page 2-40, Table 2-15 Special status species and fish and wildlife resources should be added as grazing management considerations	The Standards for Rangeland Health include management for "desired species, including native, threatened, endangered, and special-status species" (Standard	Livestock Grazing

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Service	under "Common to All" or as a separate Issue.	#3). In addition Standards for Rangeland Health include management for uplands (Standard #1), riparian and wetland areas (Standard #2), and water quality (Standard #4), which fully consider fish and wildlife habitat requirements, as well as special status species.	
Laura Romin	U.S. Fish & Wildlife Service	Page 4-27, 4.3.3 Impacts from Livestock Grazing: The DEIS claims that livestock grazing does not contribute significant nutrients to surface water. While this was the conclusion regarding the Fremont River TMDL, it may not be applicable to all grazing allotments within the Richfield District, especially where grazing occurs within or adjacent to waterbodies. Livestock grazing can affect water quality (e.g., nutrients and sedimentation) via erosion of streambanks and soil disturbance resulting in erosion, as well as animal wastes. Reevaluation or restatement of this claim in the DEIS may be warranted.	According to the Utah Division of Water Quality 303(d) list, livestock grazing isn't a signficant contributor of nutrient loading to surface water. Known seeps and springs that may be considered at risk have been fenced in accordance with the BLM Utah Standards for Rangeland Health.	Livestock Grazing
Laura Romin	U.S. Fish & Wildlife Service	Page 2-82, Table 2-19 Special Status Species and Fish and Wildlife Resources should be added as Minerals and Energys considerations under "Common to All" or as a separate Issue.	Special status species and fish and wildlife resources are considered in all alternatives, but the management prescriptions vary by alternative.	Minerals and Energy
Laura Romin	U.S. Fish & Wildlife Service	Page A14-3, Appendix 14 The Mineral Exploration and Development section should include the following stipulations: 1) Cover heater treaters to prevent perching of birds; 2) Completely net oil pits and brine pits to preclude avian access to them; 3) Avoid areas with biological soil crusts to the extent possible. The stipulations should also include success criteria for revegetation of reclaimed areas, including criteria for noxious weeds.	The best management practices listed in Appendix 14 of the Draft RMP/EIS is not a exhaustive list. Additional best management practices could be applied on a site-specific basis.	Minerals and Energy - Oil and Gas
Laura Romin	U.S. Fish & Wildlife Service	Page A14-3, Appendix 14 Mineral Exploration and Development: Onsite bioremediation of oil field wastes and spills may not be appropriate in all instances. The list of stipulations should include provisions for proper removal and disposal of oil field wastes and spills as well as remediation (and possible mitigation) of soils and wildlife habitat.	The best management practices listed in Appendix 14 of the Draft RMP/EIS is not a exhaustive list. Additional best management practices could be applied on a site-specific basis.	Minerals and Energy - Oil and Gas
Laura Romin	U.S. Fish & Wildlife Service	Page A14-5, Appendix 14 Best management practices should include: 1) restoration of riparian/wetland vegetation if disturbance is unavoidable; 2) specific practices for avoiding the transfer of aquatic nuisance species.	The best management practices listed in Appendix 14 of the Draft RMP/EIS is not a exhaustive list. Additional best management practices could be applied on a site-specific basis.	Minerals and Energy - Oil and Gas
Laura Romin	U.S. Fish & Wildlife Service	Page 2-16, Table 2-5 The RMP/DEIS does not provide a rationale for reducing the riparian buffer width from 500 feet to 330 feet for the Preferred Alternative; a wider buffer would benefit numerous resources, including water quality and fish and wildlife habitat. Comment also relevant to page 2-32, Table 2-10.	The Draft RMP/EIS has been revised to reflect that the 500 foot buffer for riparian areas applies only to the portion of the Richfield Field Office that is under the Cedar/Beaver/Garfield/Antimony RMP.	Riparian
Laura Romin	U.S. Fish & Wildlife Service	Page #ES-7, Executive Summary Route Designations: OHV use under all action alternatives may impact Bonneville cutthroat trout, Colorado River cutthroat trout and potentially other fish and wildlife sensitive species. Both of the cutthroat trout species are managed under Conservation Agreements which are voluntary cooperative plans in which the BLM and other state and federal agencies are participants. As	BLM is committed to implement the Conservation Agreements and Recovery Plans as necessary to protect and recover species. Table 2-9, page 2-24 specifically includes a desired outcome that states "Continue to work with USFWS and others to ensure that plans and agreements are updated and implemented as necessary to reflect the latest scientific data."	Special Status Species

Commentor	Affiliation	Comment	Comment Summary Response	Category
		such, planning documents like this RMP should assist with identification of threats to these species and provide conservation measures to pro-actively conserve and protect these species where they occur in the project area and are susceptible to surface disturbing impacts, including OHV use. OHV trail closures and elimination of instream crossings should be implemented in stream areas with sensitive species in order to reduce sedimentation and disease transfer risk.		
Laura Romin	U.S. Fish & Wildlife Service	Page 1-12, Table 1-2 should include in its listed plans the Conservation Agreements and Strategies for sensitive species. Conservation Agreements should include those for: Bonneville cutthroat trout, Colorado River cutthroat trout, roundtail chub, bluehead sucker, flannelmouth sucker, and northern goshawk.	The Final RMP-EIS has been modified to include these agreements in this table.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 2-1, Chapter 2, Special Status Species and Fish and Wildlife Management Action sections: See Attachment 1 to this spreadsheet (FWS Species-Specific Recommendations for Use in BLM RMP Planning Efforts, May 2003). We recommend incorporating applicable guidelines (particularly those for "All Species") into Alternative B, as the Preferred Alternative. Incorporation of these measures will help to strengthen the management direction for special status species and migratory birds.	The BLM reviewed and incorporated many of the applicable guidelines identified in the PRMP/FEIS.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 2-25, Table 2-9 Landscape scale evaluations and NSO closures should also be considered as a strategy to avoid or reduce habitat fragmentation for special status species; common to all alternatives.	The Final RMP-EIS will be modified to include "Landscape scale evaluations" in the bulleted list. Fragmentation of special status species habitat is a concern that is addressed in the EIS. To help address this potential impact, some 110,900 acres would be managed through No Surface Occupancy (110,900 acres). Some 450,500 acres would be closed to oil and gas leasing, and 1,021,600 acres would be open to leasing subject to controlled surface use and/or timing limitations. Acres open to oil and gas leasing with standard stipulations would cover 545,000 acres. Even in this area, the standard stipulations provide protection to listed species and their habitat. The conservation measures resulting from section 7 consultation with FWS on the BLM oil and gas leasing progam in Utah would also be included as applicable to the issuance of oil and gas leases. BLM believes that all of these measures would reduce impacts associated with habitat fragmentation.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 2-131, 2.7, Table 2.25 Specify the species and acreages "protected" by the OHV use restrictions and NSO restrictions as applied under the different alternatives. Simply stating that more or less area would be closed or managed is not specific enough to determine actual impacts or benefits of each of the alternatives.	Implementation of the proposed OHV restrictions and NSO designatons will benefit nearly every special status plant or animal species located within the planning area boundaries. However, due to the lack of GIS coverages for some of these species, a quantitative analysis could not be compelted. Therefore, a qualitative analysis was used.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-30, 3.3.8.1, the bald eagle is no longer listed under the Endangered Species Act. The species is still protected by the Migratory Bird Treaty Act and Eagle Protection Act. Please update the document accordingly.	The Final RMP-EIS will be updated to reflect current information.	Special Status Species
Laura Romin	U.S. Fish &	Page 3-30, 3.3.8.1 Table 3-15: The common name for Pediocactus	The Final RMP-EIS will be edited to reflect the correct information.	Special Status

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Wildlife Service	despainii is San Rafael cactus and for Pediocactus winkleri is Winkler cactus. Please edit the table accordingly.		Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-30, 3.3.8.1 Ute ladies'-tresses is not known to occur within the RFO.	The commentor is correct, however, this information was included because potential habitat does occur within the planning area. In addition, occupied habitat is located both north and south of the planning area.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-32, 3.3.8.1.5 In addition to the translocation program for Utah prairie dogs, "control of plague vectors" should be included as an authorized activity in this plan. These two management activities for UPDs (translocation and control of plague vectors) should be documented in all sections related to the species.	Control of plague vectors will continue to be an important part of Utah prairie dog management in accordance with the species recovery plan and other documents. The common to all actions portion of Table 2-9 on page 2-24 of the Draft RMP/EIS has been changed to read: "Implement species-specific conservation measures to avoid or mitigate adverse effects to known populations of BLM sensitive plant and animal species on public lands."	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-33, 3.3.8.1.6 We recommend the RMP provide more specific translocation language in the UPD section such as, "Allow translocations of listed and sensitive species to aid in conservation and recovery efforts. Implement necessary habitat manipulations and monitoring in translocation plans and allow identification and manipulation of Utah prairie dog translocation sites, to achieve suitable conditions for successful translocations".	BLM concurs that translocation and associated habitat manipulations is key in management of the Utah Prairie Dog. Section 3.3.8.1.5 describes the existing situation as part of the affected environment; proposed management actions are discussed in Chapter 2. The common to all actions section found in Table 2-9 will be modified to specifically address dusting to reflect the concerns reflected in this comments.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-35, 3,3,8.1.10 The common name for Pediocactus winkleri is Winkler cactus.	The Final RMP-EIS will be edited to reflect the correct information.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-35, 3.3.8.1.11 Threats to Last chance townsendia include livestock trampling.	The Final RMP-EIS will be updated to reflect information presented in this comment.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-35, 3.3.8.1.12 Ute ladies'-tresses is not known to occur within the RFO.	The commentor is correct, however, this information was included because potential habitat does occur within the planning area. In addition, occupied habitat is located both north and south of the planning area.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-37, 3.3.8.2 BLM does not list Mentzelia argilosa as special status species. Mentzelia argilosa is endemic to the Arapien shale in Sevier and Sanpete Counties with over half of the known population on the clay hills west of Mayfield, Utah. Special management consideration should be given to M. argilosa this species is sympatric with Phacelia utahensis and Townsendia jonesii var lutea, both BLM special status species. The Mentzelia is the rarest of the three.	Utah BLM is currently in the process of updating the State Director's Sensitive Plant Species list. Mentzelia argilosa is certainly worthy of consideration for inclusion on that list. Also, BLM has updated the draft EIS and proposed plan to restrict OHV use in Mentzelia argilosa, Phacelia utahensis, and Townsendia jonesii var lutea habitat located in the White and Rainbow Hills to designated roads and trails.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-37, 3.3.8.2.1.1 Populations of California floater have been located at Piute, and Otter Creek reservoirs (Mock et al. 2004. Genetic diversity and divergence among freshwater mussel (Anodonta) populations in the Bonneville Basin of Utah Molecular Ecology 13:1085–1098).	The Final RMP-EIS will be updated to reflect information presented in this comment.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 3-41, 3.3.8.2.5 Recent evidence indicates that the southern leatherside chub (Lepidomeda aliciae), the species in the RFO, is one of two taxa formerly known as leatherside chub (Snyderichthys copei) and qualifies as a unique species (Johnson and Jordan 2000, Dowling et al.	The Final RMP-EIS will be updated to reflect information presented in this comment.	Special Status Species

Commentor	Affiliation	Comment	Comment Summary Response	Category
		2002, Belk et al. 2005, Johnson et al. 2004).		
Laura Romin	U.S. Fish & Wildlife Service	Page 3-44, 3.3.8.2.6.13 The correct latin spelling for this plant is Lepidium montanum var. claronensis.	The Final RMP-EIS will be updated to reflect information presented in this comment.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 4-117, 4.3.8 One assumption states that, "Special status species would be managed for the benefit of those species as a priority over other resources allocations and uses." This assumption will greatly skew any impact analysis, particularly given that this prioritization is not the case with most of the alternatives, including the Preferred Alternative. The Goals and Objectives for Special Status species do not include this assumption. Remove this statement as an assumption, or add it to the preferred alternative.	Table 2-9 (Special Status Species Decisions) beginning on page 2-24 of the draft EIS, identifies a series of goals, objectives, and management guidance that, if properly implemented, will accomplish the assumption referred to by the commentor. The implementation of these measures will reduce the extent of potential impacts to special status species and their habitat. However, under the BLM multiple use management mandate, this does not mean that every acre of special status species habitat must be protected. Various mitigation measures are available to offset potential impacts. Flexibility is required in the decision-making process.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 4-118, 4.3.8 Impacts from Water Resources: It is not accurate to state "…no actions..under any of the alternatives would adversely affect water quality or reduce water quantity…" For example, potential effects to water resources are described in section 4.3.3. Revise this section and describe the potential for activities to affect water resources supporting special status species.	This paragraph presents an analysis of potential impacts to special status species and their habitat that would result from implementation of actions related to the management only of water resources (specified in Table 2-4, page 2-12). Potential impacts to special status species resulting from implementation of other programs is analyzed in other paragraphs found in this secton. BLM believes that the management of water resources identified in the preferred alternative would not adversely affect special status species or their habitat.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 4-132, 4.3.8 Leasable Minerals -- Oil and Gas: Only 4 special status species are listed as occurring in open areas or controlled surface use/timing stipulations areas. This should be revisited as we believe there could be many more species affected by oil and gas development. All special status species should be evaluated for their potential to occur in these areas. This comment applies to all Alternatives in this section.	The species listed are examples of species that could be most affected but is not intended to be an all inclusive list. This sentence has been modified in the Final RMP-EIS to better reflect this intent.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 4-132, 4.3.8 Leasable Minerals, Coal: Define "Federally-designated habitat…" Does this infer that restrictions only apply to designated critical habitat, or does it mean suitable habitat?" If it only applies to designated critical habitat, then there would still be impacts to threatened and endangered species from coal development. This comment applies to all Alternatives in this section.	Criterion 9 (defined in Appendix 8) goes beyond designated critical habitat as follows "Federally designated critical habitat for listed threatened or endangered plant and animal species, habitat proposed to be designated as critical for listed threatened or endangered plant and animal species or species proposed for listing, and habitat for Federal threatened or endangered species which is determined by the Fish and Wildlife Service and the surface management agency to be of essential value and where the presence of threatened or endangered species has been scientifically documented, shall be considered unsuitable."	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 4-139, 4.3.8 Impacts from Fish and Wildlife: The first two paragraphs describe effects only to the Mexican spotted owl, bald eagle, and Cronquist wild buckwheat. Describe effects to other special status species from habitat manipulations, range developments, and vegetation treatments.	The species listed are intended as examples of species that could be most affected and is not intended to be an all inclusive list. This sentence has been modified in the Final RMP-EIS to better reflect this intent.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page A9-1, Appendix 9 Utah prairie dog (T) and California Condor (E) should be included in the listed species section. Leatherside chub (State Species of Concern), Bonneville cutthroat trout (Conservation Agreement species), and Colorado cutthroat trout (Conservation	To avoid conclusion Appendix 9 has been removed. The species lists previously in Appendix 9 have been updated in Chapter 3 of the PRMP/FEIS.	Special Status Species

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Agreement species) should be included under Sensitive/Native Species. Bald eagles are no longer Federally-listed. Uinta Basin hookless cactus and Graham beardtongue do not occur in the RFO and should be removed from the list. Please edit the list accordingly.		
Laura Romin	U.S. Fish & Wildlife Service	Page A11-125, Appendix 11 Plant lease notices have recently been updated for plants in the Vernal Field Office area. The same notices should be applied to the Richfield Field Office area. Please obtain these notices from the State Office and incorporate into the RMP.	The updated lease notices will be incorporated in the Final RMP-EIS.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page A-14-16, Appendix 14 As such we believe that 100-year floodplain drilling can not occur if this conservation goal is to be achieved. We recommend that "no 100-year floodplain drilling" be moved to its own bulleted number and that it stand alone. There should be no provisions made for drilling in 100-year floodplains due to the fact that spills or leaks in areas with sensitive fish species could be catastrophic.	These are approved conservation measures that have already been consulted on. The intent of Measure 6 is clear and should not be modified. The introduction of this section states "Additional conservation measures, or other modified versions of these measures, may be applied for any given BLM-authorized activity upon further analysis, review, coordination efforts, and/or appropriate levels of Section 7 consultation with the USFWS."	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Map 2-36, Chapter 2 Maps We recommend leasing constraints (e.g., no surface occupancy) to protect listed plant habitat in the following areas: Eastern Sevier County (South of I-70); along Hartnet Road; between Hartnet road and the Caineville Mesa Road; on both sides of Notom Road; and to the east to Thompson Mesa.	The lease notice that appears in Appendix 11 Attachment F (lease notice for listed plant species) and other stipulations attached to oil and gas leasing permits would be sufficient to protect listed plant species in these areas. As specific projects are proposed, site-specific NEPA analysis and necessary consultation with USFWS will be conducted.	Special Status Species
Laura Romin	U.S. Fish & Wildlife Service	Page 2-121, 2.6.4, Table 2-23 Roads and trails can cause the loss, degradation, and fragmentation of special status species habitats. Special Status Species and Fish and Wildlife Resources should be included as issues in this section.	Routes where seasonal closures are needed to protect wildlife species are address under Travel Management in Table 2-17 of the Draft RMP/EIS.	Transportation
Laura Romin	U.S. Fish & Wildlife Service	Page 2-65, Table 2-17 Alternative B (Travel Management): The Mayfield Open Area (1,900 acres) and Glenwood Play Area (3,300 acres) should be omited until further survey and protection measures are established for M. argilosa and P. utahensis. All OHV recreation areas on Arapien shales should be evaluated for impacts to these 2 species. Factory Butte Play area (2,600 acreas) should be closely evaluated for impacts to Sclerocactus wrighteae.	Final decisions for motorized area designations in the final RMP have been made with consideration and consistency with other resource concerns and decisions.	Travel Management – OHV Area Categories
Laura Romin	U.S. Fish & Wildlife Service	Map 2-14, Map 2-16, Chapter 2 Maps Notom/ Bullfrog Road, Hartnet Road, and Caineville Wash Road. Management (and possible site-specific closures) of trails/roads to OHV may also be necessary along Notom/ Bullfrog Road, Hartnet Road, Caineville Wash Road to ensure conservation of plant species. Monitoring can help determine appropriate management strategies, including determining if any trail modifications or closures are needed.	A variety of data sources were utilized in developing the route inventory. Criteria was set and ID Team meetings were held to analyze individual routes. An appendix was added to the Final RMP EIS that describes the process used for route designations. Impacts to plant species were considered during route identification and analysis. Monitoring and evaluation of routes to ensure conservation of plant species will be considered as site specific planning occurs during implementation.	Travel Management – OHV Route Identification
Laura Romin	U.S. Fish & Wildlife Service	Page 2-14, Table 2-5 Design and implementation of vegetation treatments should consider wildlife habitat requirements and special status species. The current wording suggests that the Standards for Rangeland Health will be the priority factor for selecting and implementing treatments.	For Alternative B, the decision states that vegetation treatments would be implemented "to achieve or maintain Stadards for Rangeland Health and desired vegetation condition." The order these items are presented does not imply a preference for one over the other. Additionally, the Standards for Rangeland Health include management for "desired species, including native, threatened, endangered, and special-status species" (Standard #3) and "riparian and wetland	Vegetation

Commentor	Affiliation	Comment	Comment Summary Response	Category
			areas are in properly functioning condition" (Standard #2). In addition management for uplands (Standard #1) and water quality (Standard #4), the Standards for Rangeland Health fully consider wildlife habitat requirements, as well as special status species.	
Laura Romin	U.S. Fish & Wildlife Service	Page 4-39, 4.3.4 The assumption that vegetation will reestablish within 5-10 years seems overly optimistic for native species.	The assumption is not intended to mean the site will be at its pre-disturbance level within 5-10 years, but that there would be adequate vegetation to stabilize the disturbed site. The assumption also doesn't distinguish between native and non-native species, nor the potential for management intervention (e.g., seeding).	Vegetation
Laura Romin	U.S. Fish & Wildlife Service	Page 4-121, 4.3.8 Management of Noxious Weeds and Invasive Species: The document should identify any biological control agents that might be utilized and their potential effects on special status species.	The RFO considers biological controls as a potential tool among many. If taken out, then ALL consideration for biological control could be eliminated for practical consideration for the next 20 years (or more). Due to the rapidly changing science involved in biological controls, it is impossible to predict what researchers may develop in the future. Leaving biological control in the plan simply affords the possibility of keeping the toolbox more complete. The following statement has been added to the document: "future consultation would be needed for biological controls in threatened and endangered species habitats".	Vegetation
Laura Romin	U.S. Fish & Wildlife Service	Page 3-29, 3.3.8 The document should identify and adopt the State's Wildlife Action Plan.	The Draft RMP-EIS includes management actions under Fish and Wildlife Common to All Alternatives (Table 2-10, page 2-26) that support UDWR management plans and objectives. The specific conservation actions are specified in UDWR management plans, such as the Utah Comprehensive Wildlife Conservation Strategy (UDWR 2005c).	Wildlife and Fish
Laura Romin	U.S. Fish & Wildlife Service	Page 3-50, 3.3.9.3.11 We recommend the RMP provide more discussion on the potential species diversity and distribution of other (non-sensitive) non-game species that may occur in the RFO planning area. These species are important in that they provide prey base, and may be keystone or indicator species. We encourage the RFO to pursue increasing its baseline data on its non-game species.	BLM recognizes the importance of other non-game species. The information presented in this section is limited, as supporting data is limited. The Utah Natural Heritage Program database referenced provides the best information available.	Wildlife and Fish
Laura Romin	U.S. Fish & Wildlife Service	Page 3-50, 3.3.9.4 We recommend the Migratory Birds section specifically describe the potential for sensitive migratory birds to occur within the RFO area. We recommend focusing on the FWS Birds of Conservation Concern, the Partner's in Flight Priority Species, and the Utah Comprehensive Wildlife Conservation Strategy (many species overlap in these plans). These plans identify those species that should be prioritized for management attention. The RMP should describe the habitats for these species, the potential season of use, and (in Ch. 4) the potential for impacts to these species from activities in the RFO area	The Final RMP-EIS was updated to include the common to all management action to: "Consider the USFWS Birds of Conservation Concern and the Utah Partners in Flight Priority Species to identify and conserve priority nesting habitats for migratory birds."	Wildlife and Fish
Laura Romin	U.S. Fish & Wildlife Service	Page 4-18, 4.3.2 This section of the DEIS does not specifically identify what the restrictions will be (e.g., dates, areas, activities) nor does it identify areas considered to be "crucial" habitat. Crucial habitats, however, were identified in maps 3-4 through 3-7, but additional habitats for sensitive wildlife such as sensitive species, raptors and migratory birds should also be considered.	This analysis presents the impacts from fish and wildlife management actions presented in Chapter 2. The sentence will be clarified in the Final RMP-EIS to better tie the analysis to the action analyzed in Chapter 2. The information presented on maps 3-4 through 3-7 is for UDWR defined crucial habitat. Information available on crucial habitats for other sensitive wildlife species is limited and/or not available.	Wildlife and Fish
Laura Romin	U.S. Fish &	Page 4-55, 4.3.4 Impacts from Fish and Wildlife: Alternative C includes	The sentence will be clarified in the Final RMP-EIS to better tie the analysis to the	Wildlife and Fish

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Wildlife Service	"more restrictions on OHV use in crucial wildlife habitats" than the Preferred Alternative B. Please provide a list of the restrictions applicable to all alternatives so that they can be compared.	action analyzed in Chapter 2.	
Laura Romin	U.S. Fish & Wildlife Service	Page 4-115, 4.3.8 "Displacement of individuals" is mentioned but likely refers to movement of individuals away from an area, and while human disturbance can result in displacement, it can also result in more, such as modification of behavior. We recommend this section include a discussion on the impacts of human disturbance (e.g., OHV activity) to special status species in addition to the discussion on impacts to habitats.	DRMP/DEIS Page 4-117 states: "impacts to SSS would likely result from actions proposed under the following resource management programs: …Travel Management".	Wildlife and Fish
Laura Romin	U.S. Fish & Wildlife Service	Page 154, 4.3.9 Methods and Assumptions: The list of assumptions states that mitigation will be required for all surface disturbing activities; however, it is unclear in the DEIS what mitigation is available for direct loss (and fragmentation) of habitat from permanent surface disturbing activities such as development of new roads and oil fields.	In most cases, oil fields and corresponding roads are intended to be of a temporary (NOT permanent) nature on public lands. Some examples of mitigation can be found in the DRMP Chapter 2- • Use strategies to avoid or reduce habitat fragmentation when possible, including: – Collocating communication and other facilities – Employing directional drilling for oil and gas – Closing and reclaiming roads – Using topographic and vegetative screening to reduce the influence of intrusions • Mitigate the effects of proposed projects that have the potential of causing long-term or permanent habitat impacts or losses by enhancing, restoring, or creating other habitat within the project's region of influence. Consider protecting the habitat when the habitat type is rare and under severe development pressures. Protection should only be a portion of the mitigation and must contain elements of restoration or enhancement. • Use species-specific buffers and seasonal, temporal, and spatial restrictions to conserve habitat for special status species (see Appendix 11 and Appendix 14).	Wildlife and Fish
Laura Romin	U.S. Fish & Wildlife Service	Page 4-164, 4.3.9 Impacts from Minerals and Energy: This section does not include a discussion of the impacts to migratory birds from habitat loss and alteration associated with oil and gas development. Depending on which alternative is selected, a significant amount of acres (habitat) could be altered or lost, resulting in some cases in significant declines in migratory bird populations. This section should include a sizeable discussion on migratory birds, including identification of areas (and acres) subject to standard leasing conditions (for migratory birds), controlled surface use restrictions (e.g., nesting season), and areas closed to oil and gas or where no surface occupancy will occur. Estimates of population reductions for migratory birds resulting from habitat loss and alteration should also be included in this section (e.g., a relative comparison between the alternatives).	The RMP-EIS includes a range of alternatives for designations (such as wild and scenic rivers, wilderness areas, and areas of critical environmental concern) that would restrict activities and associated impacts to wildlife including migratory birds. As specific projects are proposed, site-specific NEPA analysis, including impacts to migratory birds, will be conducted. Due to the extensive habitat range of migratory birds, information is available but including detailed information in the RMP is impractical. The RMP includes BMPs for raptors (Appendix 10) and for listed species (Appendix 14). The Final RMP-EIS will be updated to refelect BLM WO 2008-050 Migratory Bird Treaty Act – Interim Management Guidance.	Wildlife and Fish
Laura Romin	U.S. Fish & Wildlife Service	Page A10-4, Appendix 10 Unoccupied Nests (last paragraph): The document states that "empirical evidence would suggest that the 3-year non-use standard has been effective in conserving raptor species." We recommend the Kanab FO retain the seven-year non-use standard for nest protection as stated in the Raptor Guidelines. This seven year standard may be adjusted on a site-specific basis, depending on raptor	The 3-year non-use standard varies from the Guidelines' suggested 7-year non-use standard before declaring nest abandonment. This variation is based upon UT-IM-2006-096 and a similar standard that has been applied for more than 20 years in two administrative areas within Utah. Empirical evidence would suggest that the 3-year non-use standard has been effective in conserving raptor species. The 3-year standard has been applied without legal challenge or violation of	Wildlife and Fish

Commentor	Affiliation	Comment	Comment Summary Response	Category
		species and other site-specific factors.	"Take" under the MBTA or the Eagle Protection Act.	
Laura Romin	U.S. Fish & Wildlife Service	Page A10-8, Appendix 10 The purpose of monitoring active raptor nests is more than simply documenting the impacts of an activity on the behavior and survival of raptors.	Appendix 10 of the Final RMP-EIS has been modified to recognize that adjustments to a site-specific project may be made based on monitoring results.	Wildlife and Fish
Leo Leckie suwa@suwa.org		I bring out my family and friends from Wisconsin regularly (at least twice a year) to visit and enjoy the Dirt Devil area regularly. They in turn have spread their experiences with extended networks of family and friends. As a result, this area has a growing list of admirers and users, nationally, rave of the areas beauty, peaceful and serene aspects. After taking a look the BLM's plans for raods and recreational ORV trails in the area, I am concerned that your preferred alternative for the Richfield RMP Travel Plan would severely damage the beauty and recreational value of the area for non-ORV recreators. The Dirty Devil has many unique, rare vales that will be severely affected by a motorized route, as will the many of us who appreciate the area for its motorless qualities as well. Thank you for your consideration of this extremely important issue.	None of the alternatives propose the Dirty Devil River area as open to OHVs. Motorized use would be limited to designated routes or closed.	Travel Management – OHV Area Categories
Liz Dyer suwa@suwa.org		I am e mailing to urge ya'll to consider that the Richfield Draft RMP fails to adequately protect Central Utah's Basin and Range region. This is gorgeous country. There's not much left of unspoiled, pristine land in our country. I have hiked these mountains and have sometimes been disturbed by the roar of off road vehicles. I am glad that some restrictions have been imposed on the off road vehicles. It is very much worth working further on the draft RMP to insure that Central Utah's Basin is protected now and for future generations.	The commentor provides no supporting evidence that the DRMP/DEIS fails to adequately protect Central Utah's Basin and Range. The BLM analyzed the impacts of travel management as outlined and described in Chapter 4 of the DRMP/DEIS. Congress recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. Also, specific decibel limitations on motorized vehicles are under the jurisdiction of the Environmental Protection Agency, and a matter of State Law. As stated in 43 CFR 8343.1(b): "No off-road vehicle equipped with a muffler cutout bypass, or similar device, or producing excessive noise exceeding Environmental Protection Agency standards, when established, may be operated on public lands."	Travel Management – OHV Area Categories
Lloyd V. Warner warwoods@infowest.com		Closing the Factory Butte area to all off road use is not in the best interest of land. It is an attempt to stop all OHV use, whether it be motorcycles, jeeps, ATVs or anything else. With millions of acres already closed where do the outdoors loving people go to enjoy their form of recreation. Why should hundreds be denied the use of our land. The false pretense of saving it for our grandchildren is absolutely ridiculous. What about the now generation, we have worked hard and saved so that in our "golden years" we might enjoy the spoils of our labor. Thank you for taking the time to read my objections.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. San Rafael, Hondo Arch, and Hidden Splender area are not within the RFO.	Travel Management – OHV Area Categories
Lonney Steinhoff lsteinhoff@CoorsTek.com		I would hope that the environmental impact study is conducted in a far and realistic manner, collecting factual data not just from the self-centered wilderness groups that want to shut all public lands off regardless of usage and/or impact. The public lands are enjoyed by hundreds of thousands of people who respect these lands. A great deal of our State and National economy depend on this recreational resource. Managing/controlling this resource is a better solution rather than shutting all access or turning it in to wilderness areas.	As part of its wilderness characteristics inventory maintenance, BLM used a combination of field checks, Interdisciplinary team review, range files, county and BLM GIS data, and review of high resolution 2006 aerial photographs.	Non-WSA Lands with Wilderness Characteristics

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Mari Dickson levelacres@wi.rr.com		Motorized vehicles should NOT be allowed to enter delicate ecosystems. Only hikers should have access to these areas.	BLM is required to follow EO 11644 and EO 11989 and 43 CFR 8340 in respect to motorized vehicle use in delicate ecosystem. These EOs and regulations guide the management of motorized vehicles.	Recreation
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	the Council respectfully disagrees with failing to include several rivers as suitable in the preferred alternative. The Council supports all of the following rivers as suitable to become Wild and Scenic Rivers with the classifications listed: • Dirty Devil River: Wild • Fremont River – Below Mill Meadow Dam: Scenic • Fremont River – Fremont Narrows: Recreational • Fremont River – Fremont Gorge: Wild • Fremont River – below Capital Reef National Park to Caineville Ditch Diversion: Recreational • Beaver Wash Canyon: Wild • Robbers Roost Canyon: Wild • Larry Canyon: Wild • No Man's Canyon: Wild The Council recommends that the above rivers be determined suitable for Wild and Scenic status and classified in the manner listed above.	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	There is absolutely no basis to find a river not suitable simply because other types of protections already exist or are being proposed. The Richfield Field Office should not find any river not suitable simply because the river is located in an area that has some administrative or congressional protection other than Wild and Scenic River designation. Layering of protection or designating a river as a Wild and Scenic River when the river is located in an area that already has or is proposed to have some other form of protection is not duplicative.	Wild and scenic river determinations are made on a case-by-case basis for their own values. The BLM's Wild and Scenic River Manual (8351.33A) includes factors to consider in the making suitability determinations. One of those factors is the "Ability of the agency to manage and/or protect the river area or segment as a WSR river, or other mechanisms (existing and potential) to protect identified values other than WSR designation." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	In the Draft RMP any and all river segments which have a proposed project that would threaten the values or free-flowing condition or outstandingly remarkable values of the river should be found suitable to become a Wild and Scenic River.	There is no language in law, regulation, or policy that is consistent with the commentor's claim.	Wild and Scenic Rivers
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	Dirty Devil Recommendations The Council fully supports the Richfield Field Office's finding the Dirty Devil suitable as a Wild river. The Council strongly recommends the Dirty Devil be found suitable and classified as follows: • Dirty Devil (54 miles): Wild The Council recommends that the Dirty Devil be found suitable for wild and scenic status and classified in the manner listed above. Values of River The values of the Dirty Devil River are clearly outlined by the Richfield Field Office in the Wild and Scenic River Preliminary Eligibility and Tentative Classification Report of 2004. I will not go into detail here, but incorporate them here by reference. Scenic and Recreation The Dirty Devil ranks as a Class A scenic quality by the BLM due to its sheer cliffs of Navajo Sandstone, 1,500 foot deep canyons, ephemeral waterfalls, and high plateaus. The area is truly incredible and can be enjoyed by the adventurous individuals. In addition to those who venture down into the canyon, the magnificence of the Dirty Devil can be seen from several viewpoints accessed by Highway 95. The area is a fantastic area to be explored by adventurous souls. Spring runoff draws kayakers and canoers from all	The information presented by the commentor has been considered in the eligibilty report and subsequent NEPA analysis.	Wild and Scenic Rivers

Commentor	Affiliation	Comment	Comment Summary Response	Category
		over the nation. Hikers, backpackers, and equestrians explore this incredible river also. From Hanksville to the Lake Powell, the Dirty Devil is one of the most beautiful easy kayak runs in the state. The water is calm in low flows and is usually Class I to II with some fun sand waves. The Dirty Devil and its tributaries are the perfect place for stunning desert backpacking. The area is remote and dry but has spectacular canyon hiking and historical areas of interest including Robbers Roost canyon. Fish and Wildlife As one of the few perennial streams in the area the Dirty Devil provides critical habitat for a wide range of fish and wildlife. The list of wildlife in the area is long. Some of the big range animals include mule deer, antelope and desert bighorn sheep. The intermittent riparian community of cottonwood, willow, cattail, and common reed support populations of fox, coyote, badger, and an abundance of bird species. Additionally, sensitive species such as Golden Eagle, Bell's vireo, and peregrine falcon have been spotted on the cliffs that surround the river. The river canyon provides habitat for bald eagles, golden eagles, and peregrine falcons. Habitat supports special status species such as the Mexican spotted owl, Southwest willow flycatcher, and yellow-billed cuckoo. The riparian corridor is also crucial for big game, neo-tropical migratory birds, non-game mammals, bats and small rodents. Geologic and Cultural The geology along the Dirty Devil is truly spectacular. The Dirty Devil has created a microcosm of the Colorado Plateau itself, revealing eight separate geologic strata and exposing layers as far down as the Cedar Mesa Sandstone. One of the most unique geologic features is the Block, a 1,000 foot tall mesa of Wingate and Kayenta Sandstones. The cultural values of the river corridor are truly outstanding and range over a period of thousands of years. From 5000 BC to 500 AD the northern part of the Dirty Devil		
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	Fremont River Recommendations The Council fully supports the Richfield Field Office's finding Fremont Gorge of the Fremont River suitable as a Wild river. However, the Council disagrees with the Richfield Field Office's finding that the Fremont River from Capital Reef National Park to the Caineville Diversion Ditch is not suitable as a Wild and Scenic River. The Council strongly recommends that all segments of the Fremont River be found suitable and classified as follows: • Fremont River – Below Mill Meadow Dam: Scenic • Fremont River – Fremont Narrows: Recreational • Fremont River – Fremont Gorge: Wild • Fremont River – below Capital Reef National Park to Caineville Ditch Diversion: Recreational The Council recommends that both segments of the Fremont River be found suitable for wild and scenic status and classified in the manner listed above. Values of River The values of the Fremont River are clearly outlined by the Richfield Field Office in the Wild and Scenic River Preliminary Eligibility and Tentative Classification	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Report of 2004. I will not go into detail here, but incorporate them here by reference. Scenic The Fremont River gorge is a spectacular sight as it cuts and carves its way down into the landscape. The Fremont River offers visitors driving through Capitol Reef an excellent opportunity to explore the geology of the Waterpocket Fold. Giant Fremont cottonwoods lining the riverbank provide beautiful green contrast to the brown Kayenta cliffs of the lower gorge, adorned with waterfalls and cataracts. Geologic The erosive processes of the Fremont have carved the deep gorge, exposing the oldest rocks in the Waterpocket Fold. A walk down the river offers a trip backwards in geologic time: Kaibab Limestone and Cutler Formations overlay Navajo, Wingate, and Kayenta sandstones, exposing spires and domes fluted by water erosion.		
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	Robbers Roost Recommendations The Council disagrees with the Richfield Field Office's finding that Robbers Roost is not suitable to become a Wild and Scenic River. The Council strongly recommends Robbers Roost Canyon be found suitable and classified as follows: • Robbers Roost Canyon: Wild The Council recommends that Robbers Roost Canyon be found suitable for wild and scenic status and classified in the manner listed above. We are extremely concerned with the approach to the suitability review of Robbers Roost provided in the Draft due to the lack of justification for the conclusions reached regarding the suitability of Robbers Roost Canyon. In fact all of the information provided in the suitability factors for Robbers Roost appears to reach a positive suitability finding rather than a not suitable finding. The decision to not include Robbers Roost Canyon is completely arbitrary and is not supported by the documentation in the Draft RMP. Therefore, Robbers Roost Canyon is in fact suitable to become a Wild and Scenic River and should be listed as such in the Final RMP. For example, under the factor 'current status of land ownership and human use of the area' the information states that 31 of the 33 miles are on BLM lands and only 2 miles is state lands. There is zero private land, which would make management difficult. Additionally, most use in the canyons is recreational. The final sentence states that the entire corridor is located within the Dirty Devil WSA. Nothing here would lead to a not suitable finding. The fact that 31 of 33 miles are managed by BLM and no private land make management of the corridor easy. Also, there are no uses which are incompatible with a Wild and Scenic River, in fact the recreational use may be enhance by designation. Robbers Roost is located within a WSA, but that has no impact on manageability of the area or any conflict of use. Thus, all information under this first factor leads towards a positive suitability finding. All information under the second factor 'uses…' also leads towards a positive suitability finding. For example, "Designation would be compatible with BLM proposals to	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers

Commentor	Affiliation	Comment	Comment Summary Response	Category
		maintain riparian values, protect the watershed and high quality water, protect potential habitat for Mexican spotted owl…" Also, "There is no proposal or potential for dam building on this segment…no such development is proposed of likely considering the area's WSA status." Finally, "Designation of Robbers Roost Canyon into the NWSRS would be compatible with and enhance wilderness use and management of the area." All of these are positive for finding Robbers Roost suitable. The third factor, also leads towards a positive suitability finding. Regarding sharing of costs of administration, "…if the river was designated as a portion of the larger Dirty Devil Watershed, there would be opportunity for joint management with the adjacent National Park Service river segment of the Dirty Devil River." Since the Richfield Field Office is recommending that the Dirty Devil be found suitable then a positive suitability finding for this segment would allow the entire river system to be managed together in collaboration with the National Park Service. Thus, this is also a plus for a positive suitability finding. The fourth factor, dealing with estimated costs if the river is designated, also leads towards a positive suitability finding. No funding for acquisition would be needed, as there is no private land within the river corridor. Since there would be no costs for acquisition this leads towards a positive suitability finding. However, there would be some additional costs for administration, but no amount is mentioned other than simply noting what types of plans would be needed to be developed. The fifth factor, states that the BLM has the capability of managing this segment as a Wild and Scenic River and such designation would not significantly elevate costs above current levels. This is definitely a plus towards a positive suitability finding. The final factor clearly lays out that there are no existing rights which may be adversely affected by designation. There are no valid mining claims, mineral leases, private lands or other existing rights within the eligible segment that would be affected by congressional designation. Furthermore, development is unlikely and there are no issues regarding upstream or downstream affects. In summary, as has clearly been demonstrated all six of the suitability factors lead towards a positive suitability finding for Robbers Roost Canyon. The Draft RMP recommendation under the preferred alternative that Robbers Roost Canyon is not suitable is arbitrary, not based on any documentation, and in fact is counter to what the documentation in the suitability factors state. The Council urges the Richfield Field Office to recommend Robbers Roost Canyon as suitable to become a Wild and Scenic River in the preferred alternative. Values of River The values of Robbers Roost are clearly outlined by the Richfield Field Office in the Wild and Scenic River Preliminary Eligibility and Tentative Classification Report of 2004. I will not go into detail here, but incorporate them here		

Commentor	Affiliation	Comment	Comment Summary Response	Category
		by reference. Robbers Roost, as the Richfield Field Office states, possesses outstandingly remarkable scenic, recreation, historic, and cultural values.		
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	The Council supports all of the rivers that the Richfield Field Office recommends as suitable to become Wild and Scenic Rivers in the preferred alternative. However, the Council respectfully disagrees with failing to include several rivers as suitable in the preferred alternative.	The No Action Alternative includes all river segments that are considered eligible for Wild and Scenic River status; however, no suitability decisions (designating WSR status) have been made. Although all eligible segments are considered in the No Action Alternative, it does not mean all of the eligible segments are suitable for Wild and Scenic River status. Alternative B is the preferred alternative because it provides a balanced approach of protection/preservation of natural resources while providing for commodity production and extraction. Alternative B provides for Wild and Scenic River suitability with less management restrictions to allow for more flexibility in considering other land uses. The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	There is absolutely no basis to find a river not suitable simply because other types of protections already exist or are being proposed. The Richfield Field Office should not find any river not suitable simply because the river is located in an area that has some administrative or congressional protection other than Wild and Scenic River designation. Layering of protection or designating a river as a Wild and Scenic River when the river is located in an area that already has or is proposed to have some other form of protection is not duplicative. As has been shown above, each type of protection is unique and is designed to protect something different the freeflowing character of a river for Wild and Scenic River designation.	Wild and scenic river determinations are made on a case-by-case basis for their own values. The BLM's Wild and Scenic River Manual (8351.33A) includes factors to consider in the making suitability determinations. One of those factors is the "Ability of the agency to manage and/or protect the river area or segment as a WSR river, or other mechanisms (existing and potential) to protect identified values other than WSR designation." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	Thus, a potential water resource development or other project would make the river segment a higher priority for being found suitable and having its values protected. Failing to find the segment suitable would cause the values of this river segment to be lost or negatively impaired.	There is no language in law, regulation, or policy that is consistent with the commentor's claim.	Wild and Scenic Rivers
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	We are extremely concerned with the approach to the suitability review of Robbers Roost provided in the Draft due to the lack of justification for the conclusions reached regarding the suitability of Robbers Roost Canyon. In fact all of the information provided in the suitability factors for Robbers Roost appears to reach a positive suitability finding rather than a not suitable finding. The decision to not include Robbers Roost Canyon is completely arbitrary and is not supported by the documentation in the Draft RMP. Therefore, Robbers Roost Canyon is in fact suitable to become a Wild and Scenic River and should be listed as	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers

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		such in the Final RMP.		
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	The fact that 31 of 33 miles are managed by BLM and no private land make management of the corridor easy. Also, there are no uses which are incompatible with a Wild and Scenic River, in fact the recreational use may be enhance by designation. Robbers Roost is located within a WSA, but that has no impact on manageability of the area or any conflict of use.	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	Designation would be compatible with BLm proposals to maintain riparian values, protect the watershed and high quality water, protect potential habitat for Mexican spotted owl. Also, there is no proposal or potential for dam building on this segment such development is proposed of likely considering the areas WSA status.	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	In summary, as has clearly been demonstrated all six of the suitability factors lead towards a positive suitability finding for Robbers Roost Canyon. The Draft RMP recommendation under the preferred alternative that Robbers Roost Canyon is not suitable is arbitrary, not based on any documentation, and in fact is counter to what the documentation in the suitability factors state. The Council urges the Richfield Field Office to recommend Robbers Roost Canyon as suitable to become a Wild and Scenic River in the preferred alternative.	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Mark Danenhauer mark@utahrivers.org	Utah Rivers Council	The Council supports all of the following rivers as suitable to become Wild and Scenic Rivers with the classifications listed: Dirty Devil River: Wild Fremont River Below Mill Meadow Dam: Scenic Fremont River Fremont Narrows: Recreational Fremont River Fremont Gorge: Wild Fremont River below Capital Reef National Park to Caineville Ditch Diversion: Recreational Beaver Wash Canyon: Wild Robbers Roost Canyon: Wild Larry Canyon: Wild No Mans Canyon: Wild	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	Wild and Scenic Rivers
Mark Luttrell suwa@suwa.org		One of my pivotal outdoor experiences occurred at the end of a solo road trip camped at Starr Springs on the south end of the Henry Mountains. It was late summer/early fall when most visitors had gone elsewhere. But not all. A group of 3 or 4 ATV riders camped nearby and in the evening and during the next day supplied a constant source of noise and disruption. In a campground, I can live with that. But they went off road north of the campground zipping between the junipers and near a large concentration of lithics (over 100,000! of them). I put distance between me and them but I continue to remember the intrusion more than the peaceful high elevation vistas I eventually gained. They deserve a place to play. But so do I and the rest of low-impact Americans. Utah has thousands of miles of off road tracks. Enough is enough. Save some of the wildland for the rest of us.	The BLM analyzed the impacts of travel management as outlined and described in Chapter 4 of the DRMP/DEIS. Congress recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. Also, specific decibel limitations on motorized vehicles are under the jurisdiction of the Environmental Protection Agency, and a matter of State Law. As stated in 43 CFR 8343.1(b): "No off-road vehicle equipped with a muffler cutout bypass, or similar device, or producing excessive noise exceeding Environmental Protection Agency standards, when established, may be operated on public lands."	Travel Management – OHV Area Categories

Commentor	Affiliation	Comment	Comment Summary Response	Category
Mark R. Werkmeister mark.r.werkmeister@intel.com		ØIt is not legal for the BLM to create wilderness areas even if they call it something else like a (WC) area. Congress reserves the right to declare wilderness areas and it is becoming extremely tiresome for the federal land management agencies, under the political pressure of the 'greens' to keep trying to dream up new schemes for creating illegal wilderness. Stop it.	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. BLM has long acknowledged that FLPMA section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court, affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when protected as WSAs.	Non-WSA Lands with Wilderness Characteristics
Mark R. Werkmeister mark.r.werkmeister@intel.com		There doesn't seem to be any real difference in management prescriptions between "non WSA lands with wilderness characteristics" and WSAs in the EIS. Please describe in detail the differences in land management between these two land management designations and why each of them is needed.	The non-WSA lands with wilderness characteristics are not managed under the non-impairment standard prescribed in the IMP. The IMP applies only to WSAs not non-WSA lands with wilderness characteristics. Alternative D of the Draft RMP/EIS proposed the most protective management for all non-WSA lands with wilderness characteristics, providing a full range of alternatives to analyze which is consistent with FLPMA. Within the PRMP/FEIS, certain non-WSA lands with wilderness characteristcs have been identified for specific management protection. Those areas and the management prescriptions are detailed within Chapter 2 of the PRMP/FEIS.	Non-WSA Lands with Wilderness Characteristics
Mark R. Werkmeister mark.r.werkmeister@intel.com		ØAs I have stated before, the SEIS is utilizing the Utah BLM 1999 statewide wilderness re-inventory. This inventory was based on criteria that were not available for public comment and review. As an OHV user who will be directly affected by your decision, regulations require that I should have a chance to review and comment on such criteria.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of aerial photo interpretation, ID team review, County and BLM GIS data, range files, and on-the-ground verification. The process was open for public review and numerous comments were received and considered.	Non-WSA Lands with Wilderness Characteristics
Mark R. Werkmeister mark.r.werkmeister@intel.com		ØExercise far more discretion in closing routes within the Special Recreation Management Areas than identified in Alternative B. These SRMA's should include a greater emphasis on motorized recreation and dispersed camping, These SRMA's provide the ability to manage the recreation use more intensively while still providing a quality motorized experience.	SRMAs can be identified to manage for a variety of recreation users and settings, which can include motorized use and non-motorized use. SRMAs do not automatically close routes. Decisions regarding OHV use within SRMAs were made to support the recreation setting and opportunities desired for the SRMA by alternative.	Recreation

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Mark R. Werkmeister mark.r.werkmeister@intel.com		ØLimiting group size to 10 vehicles is overly burdensome to the casual use that occurs with small social groups. It does not enhance area management in any way and just extra 'feel good' bureaucracy. Requiring Special Recreation Permits to recreate in an area for more than two hours is even more ridiculous. What if I want to have a siesta after my lunch? Is sleeping 'recreating'? C'mon, get real.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Mark R. Werkmeister mark.r.werkmeister@intel.com		ØIt is unnecessarily restrictive to limit camping to existing campsites within 150 if the campsites can be reached on existing spurs. Three hundred feet would be a more typical and workable limit.	The management suggested within the comment was included within the range of alternatives. Many routes which provide access to campsites have been identified and would be designated routes. Appendix 9 provides criteria to consider the addition of designated routes in future if necessary to better address resources and resource use conflicts.	Recreation
Mark R. Werkmeister mark.r.werkmeister@intel.com		ØInclude more of the managed open areas that currently exist and include them into Alternative B. Users need to feel a sense of freedom somewhere and providing adequate open areas lessens the temptation to deviate from the designated trail system in other areas.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Mark R. Werkmeister mark.r.werkmeister@intel.com		ØThe drive from Hite north to Sunset Pass the then west through HatchCanyonand PoisonSpringsCanyons is easily among my top five 4WD route list. I have made the trip numerous times and was glad to see at least some of it included in Alternative B. But you MISSED some of it! There is a loop that comes off of the N Hatch Canyon road at lat 38,4,28, long -110,12,46, heads west down the South Hatch Canyon Wash and eventually rejoins the NorthHatchCanyonroad at lat 38,6,8,long -110,18,52. It also has a significant spur that heads south and dead ends at an old mine on the north side of The Block. These go into the Fiddler Butte WSA but the roads are clearly cut by bulldozer and grader so they predate the establishment of the WSA. I have driven these in the past, they are great discovery routes in a primitive setting, and deserve to be preserved as motorized routes. The same holds true for all existing routes in current WSA's. Access was properly included when the WSA's were created and should be maintained in all cases.	Within the Fiddler Butte WSA, ways would be designated in compliance with the IMP. Some of the routes identified within the comment are non-inventoried ways within the WSA which are not available for motorized use.	Travel Management – OHV Route Identification
Markus Opel MARKUSOPEL@YAHOO.COM		Thank you for the opportunity to comment on the BLM's Richfield Draft Resource Management Plan (RMP). In my opinion, ORV use must be much more heavily restricted. The long-lasting damage that ORV's cause in no way is justified by the "fun" their users may experience.	The BLM analyzed the impacts of travel management as outlined and described in Chapter 4 of the DRMP/DEIS. Congress recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. Also, specific decibel limitations on motorized vehicles are under the jurisdiction of the Environmental Protection Agency, and a matter of State Law. As stated in 43 CFR 8343.1(b): "No off-road vehicle equipped with a muffler cutout bypass, or similar device, or producing excessive noise exceeding Environmental Protection Agency standards, when established, may be operated on public lands."	Travel Management – OHV Area Categories
Max Reid		There is a route near Chimney Springs, Durkee Springs east of Marysvale that is open on Forest and closed on BLM, Alt. B. It facilitates a loop ride. Route #P8SR0580 needs to be left open to allow riding public opportunity to make the entire loop legally.	PTSR0580 was reassessed and identified as open for consistency with FS and to create loop.	Travel Management – OHV Route Identification
Megan Williams	Southern	As mentioned in my cover letter, the BLM did not conduct any analysis	BLM's draft air resources guidance states that quantitative dispersion modeling is	Air Quality

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	Utah Wilderness Alliance	of air quality Impacts for the Richfield Resource Management Plan (RMP). The BLM does not provide specific analyses of near-field, far-field or cumulative air quality impacts as required by NEPA for resource management plans. A simple, undocumented statement such as the one on page 3-4 of the DEISIRMP that "[n]o major air pollution sources are found nor have polluted airsheds been identified within the planning area" does' not mean that the BLM is not obligated to fully assess the potential effects on human health and the environment (e.g., visibility) from air pollution that will result from activities authorized in the RMP. Under NEPA, the BLM has obligations to assess and report the cumulative impacts of expected emissions in the Richfield area on the National Ambient Air Quality Standards (NAAQS), prevention of significant deterioration (PSD) increments, and air quality related values (AQRVs) and to identify alternatives or other mitigation measures sufficient to prevent expected violations of NAAQS, PSD increments and adverse impacts on AQRVs (e.g., visibility impairment). In order to meet its obligation under FLPMA to "provide for compliance" with the requirements of the Clean Air Act (CAA) the BLM must conduct a full-scale quantitative analysis of the air quality impacts in the Richfield area.	inappropriate in the absence of detailed emission data, especially source location information. BLM would consider performing quantitative modeling analyses for a project-specific EIS associated with a proposed project.	
Megan Williams	Southern Utah Wilderness Alliance	The DEIS/RMP should include predicted concentrations in order to determine compliance with CAA requirements. This is the only way in which the BLM can provide for compliance with air quality standards as specified by the FLPMA in 43 U.S.C. § 1712(c)(8).	BLM's draft air resources guidance states that quantitative dispersion modeling is inappropriate in the absence of detailed emission data, especially source location information.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	The BLM has in fact completed full-scale modeling analyses for other draft RMPs, including the Farmington, New Mexico;3 Vernal, Utah; and Roan Plateau, Colorado resource management plans. While there were serious flaws in these analyses, the fact that air quality dispersion modeling analyses were performed sets a precedent for the inclusion of comprehensive quantitative analyses in all RMPs. In fact, the EPA is insisting •that the BLM go back and perform an air quality dispersion modeling analysis in the Vermillion Basin in Colorado for the Little Snake draft RMP." And in the June 2004 Final Richfield RMP Management Situation Analysis (Richfield MSA, p. 3-14) the EPA suggested an air dispersion modeling analysis be performed for the combined Richfield/Price Field Office area: It is time for the BLM to consistently fulfill its obligation to complete these analyses for all RMPs, including this RMP for the Richfield Planning Area. Since the BLM went so far as to describe emissions sources in the planning area, is seems clear that a quantitative modeling analysis is achievable and therefore must be completed as part of this DEIS/RMP.	BLM has performed quantitative modeling analyses for draft RMP when adequate air resources data were available. For example in the Roan Plateau RMP, detailed air resources data were available for the Roan Plateau RMP from the detailed proposed oil & gas activities.	Air Quality
Megan Williams	Southern Utah Wilderness	The BLM must acknowledge the existing air quality concerns in the Richfield Planning Area (RPA) and recognize that high background levels of air pollutants can mean that even if the activities analyzed in	Please see the revised air quality resources section of chapter 3 of the PRMP/FEIS.	Air Quality

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	Alliance	the DEISIRMP will result in only minor increases in certain pollutants, the aggregate level of pollution that could result might have significant detrimental effects on human health and on visibility.		
Megan Williams	Southern Utah Wilderness Alliance	There are no background concentrations of PMIO or PM2.5 identified in the DEISIRMP. The BLM must include an assessment o fPM background concentrations for the RPA in order to be able to determine compliance with the coarse and fine particle NAAQS. There are currently no PM monitors in the area. Data are available from Moab and Vernal- both of which are, in general, similar to the. Richfield area in terms of population and the types of background air pollution sources present.	Thank you for your interest in protecting Utah's air resources. Please see the revised air quality resources section of chapter 3 of the PRMP/FEIS.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	The EPA recently lowered the short-term PM2.Sstandard from 65 ug/m3 to 35 ug/m3 because scientific information showed that the pollutant is a health concern at levels lower than what the previous standard allowed. The BLM must base an air quality assessment for the Richfield planning area on the revised, more stringent, NAAQS for fine particles and must revise the DEIS/RMP accordingly.	Please see the revised air quality resources section of chapter 3 of the PRMP/FEIS.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	The BLM has an obligation, under NEPA, to evaluate all potential health effects from exposure t6 increased pollution under the various alternatives of this DEIS/RMP. The fact that the EPA has set the PM2.S standards at levels that some would claim are not adequate to protect human health should not limit the BLM to using only EPA's standards. The BLM must assure adequate protection of human health from exposure to fine particles in the area and could certainly use the CASAC recommendations as a guide for achieving this protection.	The EPA sets the NAAQS to be protective of the most vulnerable citizens (infants, elderly, people with asthma).	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	If the BLM is going to allow growth in oil and gas development and recreation activities in the area it must also establish strict and enforceable measures to control fine particle emissions from these sources to ensure that the area is in compliance with the PM NAAQS.	The State of Utah has the regulatory authority and responsibility to enforce air quality regulations. BLM will continue to exercise its land management authority and responsibility to analyze potential air quality impacts, to set levels-of-concern and desired-future-conditions, and to support air resources monitoring.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	Ozone concentrations must be a concern to be evaluated for the Richfield DEIS/RMP. It is extremely important that the impact of the allowed development on ozone concentrations along with all other existing and expected growth of ozone precursor emissions in the region be evaluated. Considering the recent studies on the ozone potential of oil and gas development emissions, the elevated ozone concentrations in the region, and the health and environmental impacts that can occur, it is imperative that the DEIS/RMP disclose to the public the impacts that could occur due to ozone formation from the development. The CASAC has put forth a unanimous recommendation to lower the 8 hours standard from 80 parts per billion (Ppb) to-somewhere between 60-70 ppb. So, even ozone concentrations at levels as low as 60.ppb can be considered harmful to human health and the BLM must consider this when evaluating the air impacts in the DEIS/RMP.	BLM recognizes that the high ozone concentrations measured in Utah are a serious concern. BLM is in discussions with WESTAR and its member state and federal agencies on regional ozone analyses for western states with significant energy development. The State of Utah was the first of these states to favor these studies.	Air Quality

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Megan Williams	Southern Utah Wilderness Alliance	There are no background concentrations for ozone in the DEIS/RMP analysis. The BLM must include an assessment of ozone background concentrations for the- RPA in order to be able to determine compliance with the 8-hour ozone NAAQS.	Please see the revised air quality resources section of chapter 3 of the PRMP/FEIS.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	The BLM must establish strict and enforceable mitigation measures that essentially do not allow for any growth in NOx and VOC emissions in the area in order to protect human health and to avoid violations of the ozone NAAQS. In order to protect human, health and to fulfill its responsibility to provide for compliance with the ozone standard in this DEIS/RMP, the BLM must ensure that this value does not increase further and instead make a plan within this DEISIRMP to keep ozone below harmful levels.	Please see the revised air quality impact analysis section of chapter 4 of the PRMP/FEIS. The State of Utah has the regulatory authority and responsibility to enforce air quality regulations. BLM will continue to exercise its land management authority and responsibility to analyze potential air quality impacts, to set levels-of-concern and desired-future-conditions, and to support air resources monitoring. The PRMP/FEIS includes a list of mitigation options that could be applied to a specific proposed project.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	The DEIS/RMP does not discuss any specific impacts on visibility from the proposed development scenarios. The BLM's statement in the Price RMP that "the potential for cumulative visibility impacts (increased regional haze) is a concern" in the area and the fact that oil and gas development in the area has in the past and may in the future impact visibility in nearby Class I areas makes it all the more essential that the BLM fully analyze the impacts of this DEISIRMP on visibility in nearby Class I areas.	Please see the revised air quality impact analysis section of chapter 4 of the PRMP/FEIS.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	The BLM has not analyzed whether the plan will prevent significant deterioration (PSD) of air quality, as required by the Clean Air Act. The BLM must complete an analysis to determine how much of the incremental amount of air pollution allowed in clean air areas (i.e., PSD increment) has already been consumed in the affected area and how much additional increment consumption will occur due to the proposed development. Without this analysis, the BLM is not ensuring that the air quality in the RPA will not deteriorate more than allowed under the CAA. A complete PSD increment analysis is an important component for this DEIS/RMP. The BLM must evaluate the potential effects of the oil and gas development and recreational vehicle use, among other things, on compliance with the PSD increments. Modeling of all emission sources is necessary to determine the affect the activities analyzed under the various scenarios of the DEIS/RMP will have on human health, visibility, and compliance with the PSD requirements of the Clean Air Act.	The State of Utah has the regulatory authority and responsibility to perform a PSD Increment Consumption Analysis. As part of a quantitative modeling analysis for a project-specific EIS, BLM would consider comparing potential concentrations to the applicable PSD increment. This comparison would not constitute a regulatory PSD Increment Consumption Analysis.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	The BLM must inventory all potential emissions from oil and gas sources (including coal-bed methane development), recreational activity sources (e.g., off-road vehicle emissions), prescribed burning and all other potential air emissions sources from BLM administered activities in the RPA. In particular, the oil and gas inventory must include a comprehensive evaluation of fugitive and point source emissions from construction and operation activities and must include all sources of PM2.S, PM1o, NOx, VOC and HAP emissions. The recreational activity	The emissions inventory presented includes potential emissions from BLM activities, as estimated by the Richfield FO. The BLM did not include emissions from non BLM activities such as lawnmowers, etc, because the purpose of the RMP analysis is focus on potential emissions and impacts from BLM activities.	Air Quality

Commentor	Affiliation	Comment	Comment Summary Response	Category
		source inventory must 'include a comprehensive evaluation of emissions from recreational vehicle use (e.g., using EPA's AP-42 emission factors to estimate the fugitive dust emissions from travel of off-road vehicles (ORV) on unpaved roads and EPA's MOBILE6.2 model to estimate ORV exhaust and brake and tire wear emissions). The Richfield MSA includes an inventory of 1996 point-source emissions totals for the various counties in the RPA (Figures 3.1-1 and 3:1-2 on pp. 8-9). However, a much more detailed and updated look at area emissions is needed. In addition to a more comprehensive inventory of oil and gas activities, recreational activities and other BLM administered activities in the RPA, the BLM must inventory all pollutants from all other air pollution sources in the planning area as well as all sources expected to impact the same areas impacted by emissions from the planning area. These sources include any state-permitted sources in Utah and surrounding states, any Utah Division of Oil, Gas and Mining permitted oil and gas wells - particularly wells found on lands managed by the School and Institutional Trust Lands Administration, the oil shale research, development and demonstration sites, gypsum mining operations as well as all reasonably foreseeable development (RFD) sources (e.g., other NEPA projects, proposed power plants, proposed coal mines such as the Alton coal mine, future commercial tar sands development, etc.). The reasonably foreseeable development projects inventory should include all sources recently permitted or which have recently submitted complete PSD permit applications but which are not yet operating, that will have an impact on the same areas impacted by the Richfield planning area.		
Megan Williams	Southern Utah Wilderness Alliance	Several PSD permit applications have been submitted, and some permits have been issued, for coal-fired power plants to be located in areas that could impact the same area impacted by the Richfield planning area. Coal fired power plants can often have significant impacts on a Class I area even when located 200-300 km or more away from that area. Specifically, the following power plants were recently permitted or are proposed in the region: • The 270 MW Sevier Power Company coal-fired power plant in Sigurd, Utah in the RPA (recently permitted) • The 950MW Unit 3 Intermountain Power Project in the central part of Utah near Delta (permit issued) • The 600 MW Unit 4 at the Hunter Power Plant (PacifiCorp) in central Utah (no permit issued yet) • The 110 MW Unit 2 at the Bonanza Power Plant in Uintah County in northeast Utah (permit issued August 30, 2007) • The 1,500MW Desert Rock power plant in northwest New Mexico (no permit issued yet) All of these power plants have the potential to impact the same Class I areas that are impacted by the Richfield planning area an~ therefore, must be included in the BLM's regional inventory. In particular,	BLM acknowledges that the potential development of these power plants may have impacts and has added the Sevier Power Plant and the Intermountain Power Plant emissions. The other power plant emissions are not available yet.	Air Quality

Commentor	Affiliation	Comment	Comment Summary Response	Category
		the Sevier Power Company's recently-permitted 270 MW coal-fired plant to be constructed in Sigurd, Utah will lie at the heart of the area with the highest oil and gas potential and the highest population concentrations in the RPA and it is critical that this source's potential impacts be considered in the BLM's cumulative air quality analysis.		
Megan Williams	Southern Utah Wilderness Alliance	The regional inventory must also include any emissions from NEPA projects in Utah and in other states that could be impacting the same area as the Richfield planning area. There are a large number of resource management plans being revised in Utah all at the same time - the Monticello, Price, Moab and Vernal plans, all of which are close to the Richfield planning area, are simultaneously being updated. In addition, the BLM is proposing a RMP for the Canyons of the Ancients National Monument in southwest Colorado. The BLM must make sure that the projected growth in all of these planning areas, as a whole, will not have significant impacts on air quality in the region. There are also several NEPA-approved projects in the area with remaining emissions that should also be included in the RFD inventory. These include Roan Plateau (Colorado) RMP sources and projects in Moffat County, Colorado (Little Snake Field Office) such as the Vermillion Basin Project. The remaining development in any NEPA-approved projects in the area must be included in the RFD inventory.	BLM acknowledges that distant sources may impact the same areas (such as Capitol Reef) as BLM activities within the Richfield planning area may impact. The purpose of the air resources analysis of the Richfield RMP is to focus on potential impacts from the Richfield FO to areas such as Capitol Reef, and not to provide a comprehensive analysis of all sources that could impact Capitol Reef.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	I. A Near-Field Modeling Analysis to Assess Local Air Quality Impacts A near-field modeling analysis of localized maximum ambient-air impacts should be performed to assess whether the activities allowed under the Richfield DEIS/RMP alternatives would comply with the NAAQS and the PSD Class II increments. The inputs for this analysis should include all of the air pollution source categories allowed under the alternatives of the Richfield DEIS/RMP - e.g., oil and gas development, recreational activities, prescribed burning, etc. The maximum emission rates from sources over the averaging times of the standard for which compliance is being assessed should be modeled The modeling analysis should be based on at least one year of quality-assured, on-site, representative meteorological data or, if no on-site data is available, five years of meteorological data from the closest meteorological station representative of the area. See, e.g., Sections 9.3.a., 9.3.1.2., and 9.3.3.2. of EPA's Guidelines on Air Quality Models at 40 CFR Part 51, Appendix W. For the NAAQS analysis, appropriate background concentrations reflective of current air quality in the area should be added to the modeling results.	BLM's draft air resources guidance states that quantitative dispersion modeling is inappropriate in the absence of detailed emission data, especially source location information. BLM would consider performing quantitative modeling analyses for a project-specific EIS associated with a proposed project.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	2. A Far-Field Modeling Analysis to Assess Air Quality Impacts on the Nearby Class I Areas: The BLM must perform a far-field modeling analysis to assess whether the activities allowed under the various alternatives of the Richfield DEIS/RMP would adversely impact air	BLM's draft air resources guidance states that quantitative dispersion modeling is inappropriate in the absence of detailed emission data, especially source location information. BLM would consider performing quantitative modeling analyses for a project-specific EIS associated with a proposed project.	Air Quality

Commentor	Affiliation	Comment	Comment Summary Response	Category
		quality in nearby Class I areas. The analysis should include all of the Utah Class I areas. as well as Class I areas in other States that could be impacted by emissions from the RPA such as Mesa Verde National Park in southwest Colorado and Grand Canyon National Park in Arizona. The maximum emission-rates from sources over the averaging times of the standard for which compliance is being assessed should be modeled. For visibility impacts, this require~ modeling of the maximum 24-hour average emission rates. The modeling analysis should be based on three years of mesoscale meteorological data, pursuant to Section 9.3.1.2.d. of EPA's Guidelines on Air Quality Models at 40 CFR Part 51, Appendix W. The far-field analysis should assess the impacts of the alternatives of the Richfield DEIS/RMP on the Class I increments and on air quality related values, including visibility.		
Megan Williams	Southern Utah Wilderness Alliance	3. A Cumulative Air ,Quality Impacts Analysis The BLM must 'perform a cumulative analysis of air quality impacts that could occur under the various a1ternatives.ofthe Richfield DEIS/RMP, as follows. Specifically, both near-field and far-field analyses, with comprehensive emissions and meteorological data inputs as described above, should be completed to assess compliance with the NAAQS and Class II increments as well as, to determine impacts on air quality related values and the Class I increments in all potentially affected Class I areas. The analysis must include all existing sources and reasonably foreseeable sources of air emissions that could impact the same area impacted by the Richfield planning area. For the Class I and Class II PSD increment analyses, an evaluation of all increment consuming emissions from existing sources must be made, which would include all increases in emissions since the applicable minor source baseline date that have occurred at existing sources, as well as all new sources of emissions that came into existence after the applicable minor source baseline date and reasonably foreseeable sources not yet operating. Because only those emissions that are new after the applicable baseline date consume the available PSD increment, it is not acceptable or appropriate to use monitoring data as reflective of existing source emissions even if the monitoring data could be shown to be reflective of the maximum concentrations of all sources impacting the area. If the sources being modeled are not isolated, as is the case in this modeling assessment, then modeling of existing sources is necessary to determine the potential contribution of background sources. See Section 9.2.1 of EPA's Guidelines on Air Quality Models at 40 CFR Part 51, Appendix W. A separate emissions inventory must be developed to reflect those emission changes since the applicable baseline date, and those emissions changes must be modeled to demonstrate compliance with the PSD increments.	BLM's draft air resources guidance states that quantitative dispersion modeling is inappropriate in the absence of detailed emission data, especially source location information. BLM would consider performing quantitative modeling analyses for a project-specific EIS associated with a proposed project.	Air Quality

Commentor	Affiliation	Comment	Comment Summary Response	Category
Megan Williams	Southern Utah Wilderness Alliance	The BLM must also disclose the cumulative hazardous air pollutant (HAP) impacts to the exposed population. There is no assessment of the impacts of HAP emissions, in conjunction with projected emissions from the BLM sources, on human health in the RPA. The BLM's HAP assessment must be a cumulative one, not just an analysis of the incremental risk associated with the oil and gas projects, which would be imposed on top of existing health risks in the area. It should., at a minimum, include an analysis of the health impacts of the following HAPs associated with oil and gas development: benzene, toluene, ethylbenzene, xylene, n-hexane, 1,3-butadiene, formaldehyde and secondary formaldehyde24 as well as diesel exhaust. In particular, the cancer risk associated with diesel exhaust emissions from oil and gas development may be significant and is often overlooked. EPA's health assessment for diesel exhaust found that long-term exposure to diesel exhaust poses lung cancer risks while short-term exposures can cause lung irritation and inflammation. Heavy diesel trucks will be. required to develop and operate in the' fields and well drilling will be performed using large diesel-powered drilling rigs. Each of these HAPs comes with its own suite of concerns to human health and it is imperative that these pollutants be considered in the air quality analysis for this DEIS/RMP.	BLM would consider a HAPs risk assessment for a project-specific EIS associated with a proposed project.	Air Quality
Megan Williams	Southern Utah Wilderness Alliance	The BLM has not evaluated the air quality impacts from the activities analyzed under the Richfield DEIS/RMP (the proposed development) and has not proposed adequate enforceable mitigation measures to assure no adverse impacts on air quality are occurring or will occur in the affected area: The BLM passes this off by saying: "Potential adverse impacts will be mitigated through site-specific measures identified in NEPA documents prepared at the time an action in the area is proposed. Mitigation will be developed as part of the State permitting process and PSD review." Richfield MSA at 3-4. However, the BLM has an obligation under NEPA to include adequate plans to protect air quality in the area as part of this DEIS/RMP process. The BLM's mandate under NEPA to "provide for compliance" with the air quality standards gives the agency the authority to regulate sources. on the land it leases in order to prevent violations of applicable air quality standards. Additionally, the BLM has sole authority to allow pollution sources to locate on its land-that is, the BLM has sole authority in the first instance to allow or disallow sources of emissions such as oil and gas well sites. At the basic level, this would allow the BLM to stop any additional projects from taking place if those projects would further degrade the environment at an unacceptable level. The BLM should recognize and implement this underlying authority, as necessary, so as to meet its statutory obligation to provide for compliance with the Clean Air Act and related laws and, more fundamentally, to ensure air quality is	BLM's draft air resources guidance states that quantitative dispersion modeling is inappropriate in the absence of detailed emission data, especially source location information. BLM would consider performing quantitative modeling analyses for a project-specific EIS associated with a proposed project.	Air Quality

Commentor	Affiliation	Comment	Comment Summary Response	Category
		protected throughout the Richfield Planning Area and all other affected areas in the region.		
Mike DeHoff	Outward Bound	We also support the Dirty Devil SRMA as described in Alternative D, with one exception. We do not feel that the limitation that only one commercial group can occupy a side canyon at a time is necessary. Some of these side canyons have capacity of more than one commercial group, based on terrain and season of occupancy, and we feel that management objectives to be addressed through this limitation can be addressed through other means such as itinerary control.	The one-half mile stipulation applies to the issuance of SRPs prior to completion of the SRMA activity plan. These stipulations are consistent with SRP stipulations for current SRPs and were developed based on recommendations within the Mexican spotted owl recovery plan to reduce recreation related impacts to the species. Surface disturbing activities from other resources would be addressed through site specific NEPA for those proposals. A monitoring program is a component of an SRMA management plan.	Recreation
Milton Derrick		First, BLM's disposal of Tracts 19 and 20 through sale or trade would nearly double the amount of private land in the Grover area, which would radically affect the character of the Grover community. No one who lives in Grover wishes to see this to occur.	Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action.” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty
Milton Derrick		The two federal Tracts provide ideal habitat for large number of wildlife species including wild turkeys, bobcats and black bears seasonally, to name a few. Many of the indigenous species traverse the narrow federal Tracts daily to water at Carcass Creek. Additionally, the Utah Division of Wildlife Resources considers the Tracts to be prime elk and mule deer habitat. Disposal and development of the Tracts will only reduce the available habitat in the area and introduce more noise, traffic, shooting, and off road land disturbances. Carcass Creek, which passes through Tract 20, is the primary source of water for a large area and large number of wildlife. Sale and development ofthe Tracts will only harm the efficacy this extremely valuable water source.	Prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty
Milton Derrick		Highway 12 didn't exist when I purchased my land. The highway has been designated a scenic byway and an All American Highway, of which there are very few. According to the Department of Transportation, the view shed from the Highway must be protected from development to preserve the values that were considered in the designation of Highway 12 as an All American Highway. The Tracts proposed for disposal are within the view shed ofHighway 12, and BLM has a responsibility to protect the values identified for protection by the All American Highway designation.	Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action.” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
			satisfaction of the authorized officer and may, therefore, preclude disposal.	
Nano and Gil Podolsky		In addition, we are puzzled by the lack of discussion about water resources necessary for recreation, culinary, irrigation, oil and gas development, and other uses. We realize that BLM retains the water rights for the areas managed by the agency. We understand that any "change in use", which would result from the apparent commodity priorities given in the "recommended Alternative B", would require application to the Utah State Division of Water Rights. It is curious that so essential a requirement would be absent from the 3 volumes of explanations, especially since water issues abound in the the eastern part of the Richfield area. As you know, "change in use" applications involve their own comment, protest, appeal, etc. periods at the local level.	The federal government has delegated the authority to allocate water within state boundaries to state governments. This means that even though BLM is a federal agency, it must seek water rights from state governments to obtain and provide water for BLM uses. These uses include but are not limited to irrigation, wildlife water and habitat, livestock watering, recreation, fisheries, and riparian/wetlands.	Water Resources
Nano and Gil Podolsky nbgp@xmission .com		we are puzzled by the lack of discussion about water resources necessary for recreation, culinary, irrigation, oil and gas development, and other uses.	The federal government has delegated the authority to allocate water within state boundaries to state governments. This means that even though BLM is a federal agency, it must seek water rights from state governments to obtain and provide water for BLM uses. These uses include but are not limited to irrigation, wildlife water and habitat, livestock watering, recreation, fisheries, and riparian/wetlands.	Water Resources
Nano and Gil Podolsky nbgp@xmission .com		We realize that BLM retains the water rights for the areas managed by the agency. We understand that any “change in use”, which would result from the apparent commodity priorities given in the “recommended Alternative B”, would require application to the Utah State Division of Water Rights. It is curious that so essential a requirement would be absent from the 3 volumes of explanations, especially since water issues abound in the the eastern part of the Richfield area. As you know, “change in use” applications involve their own comment, protest, appeal, etc. periods at the local level.	The federal government has delegated the authority to allocate water within state boundaries to state governments. This means that even though BLM is a federal agency, it must seek water rights from state governments to obtain and provide water for BLM uses. These uses include but are not limited to irrigation, wildlife water and habitat, livestock watering, recreation, fisheries, and riparian/wetlands.	Water Resources
none none	Southern Utah OHV Club	In short, there is a "win-win" solution which the Counties in association with the OHV Club would ask the BLM to consider as it fine tunes and finalizes the Factory Butte Recreation plan portion of the Richfield DRMP/EIS. This "win-win" compromise plan is within the parameters of the range of alternatives which have been scoped and studied in the Richfield EIS process.	BLM has considered the proposals submitted by several commentors. The commentors' proposal is included within the range of alternatives considered within the Draft RMP/EIS. The Proposed RMP/Final EIS has been revised to address the proposal and the commentors' concerns. Several surveys and clearances will be required to identify the location of specific trails. The exact location of any trails will be clearly marked. The general location of trails, kiosks, fences, and other facilities are identified in the Proposed RMP/Final EIS. The location of these facilites will be specified in activity level planning. The area will be strictly monitored to include compliance with the plan. Following BLM policy, the RFO will take a cooperative management approach to implement the plan.	Transportation
none none	Southern Utah OHV Club	A state-wide OHV group filed a lawsuit against the BLM to challenge this closure, and Wayne and Garfield Counties joined the lawsuit. For purposes of that lawsuit, the plaintiffs assert that the entire 190,000 acre Factory Butte Area should be returned to an "open cross-country" status.	The Factory Butte emergency closure order is independent of and outside the scope of this RMP planning process. Further, the BLM has no duty to obtain input from the public prior to issuing a restriction order under the 43 CFR. Threats to threatened and endangered species in the Factory Butte area were first identified as an issue in the 1982 Henry Mountains MFP. Protection of threatened and endangered species in the Factory Butte area has been a management issue	Travel Management – OHV Area Categories

Commentor	Affiliation	Comment	Comment Summary Response	Category
			ever since and has been carried forward as a management issue in the RMP process by BLM staff.	
Norman McKee paws@scinternet.net		Appendix 5: item # 4 is of critical importance for future management of BLM lands. The Land Tenure Adjustment Criteria must include an aggressive effort by the BLM staff to make land trades with the State Institutional Trust Lands Administration (SITLA). Nothing of substance is mentioned about pursuing trades with SITLA or with private landowners.	The Draft RMP-EIS Table 2-18 (page 2-77) states "Give exchanges with the State of Utah priority consideration." Appendix 5 addresses criteria for all other land tenure adjustments.	Lands and Realty
Norman McKee paws@scinternet.net		Appendix 9: no mention of Colorado River Cutthroat Trout as a sensitive species. No mention of extirpated species from the Richfield RMP area.	The Colorado River cutthroat trout and other extirpated Colorado River threatened and endangered fish have been included in the PRMP/FEIS Chapter 3.	Special Status Species
Norman McKee paws@scinternet.net		No specific mention of re-introduction efforts for Colorado River or Bonneville Cutthroat Trout back into appropriate streams, such as on the Henry Mountains.	The Draft RMP-EIS recognizes the importance of fish and wildlife habitat management and includes management actions under Fish and Wildlife Common to All Alternatives (Table 2-10, page 2-26) that support UDWR management plans and objectives. Reintroductions would e implemented cooperatively with UDWR. The RMP allows for fish and wildlife actions, such as the one suggested by the commentor, to occur. Utah BLM is also signatory to the conservation agreements and strategies for these species in which reintroduction efforts are discussed.	Special Status Species
Norman McKee paws@scinternet.net		Table 2-10, page 26: clear evidence exists of the historical presence of beaver in most drainages. The re-introduction and management of beaver should be strongly considered in riparian management. An array of wildlife and ecological conditions are affected.	The Draft RMP-EIS recognizes the importance of fish and wildlife habitat management and includes management actions under Fish and Wildlife Common to All Alternatives (Table 2-10, page 2-26) that support UDWR management plans and objectives. Reintroductions would need implemented cooperatively with UDWR. The RMP allows for fish and wildlife actions, such as that suggested, to occur.	Wildlife and Fish
Ona Segundo	Kaibab Band of Paiute Indians	The definition for ACECs in FLPMA (at least as it appears in the DRMP/DEIS) does not appear to have exculpatory language that allows the BLM to deny protection to areas nominated that fit the criteria listed. All areas identified as having relevant and important values, should at least have the limited protections of an ACEC designation.	See BLM Manual 1613: BLM is required to carry forward ACEC recommendations in at least 1 Alternative. The nondesignation of an ACEC does not necessarily reflect a lack of protection - BLM has a range of management tools available.	Areas of Critical Environmental Concern
Ona Segundo	Kaibab Band of Paiute Indians	we require the BLM to follow an Executive Order (later strengthened in another Executive Order) that was left out of the RMP/DEIS as a Critical Element but to which the BLM remains subject. Please reference EXECUTIVE ORDERS 11644 AND 11989.	The commentor's concerns have been incorporated into Chapter 4.	Process and Procedures
Paul Mortensen	Hanks & Mortensen P.C.	Proposed Badlands ACEC. Page 4-475. Again there is no socioeconomic analysis of the effects of this terrible idea.	The BLM is directed by law, regulation, and policy to consider designating and protecting areas of critical environmental concern when developing land use plans. ACECs are evaluated for relevance and importance criteria and not based upon socioeconomic analysis. The Badlands ACECs was evaluated and found to possess relevant and importance values. Therefore, the Draft RMP identified the Badlands ACEC within a range of alternatives. The commentors preference of not selecting Badlands ACEC falls within the range of alternatives. The Draft RMP provides an area-wide socioeconomic analysis in Section 4.6 Impacts to the Social and Economic Environment. Further, if the proposed Badlands ACEC were selected, site-specific ACEC would be developed that address socioeconomics.	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
Paul Mortensen	Hanks & Mortensen P.C.	The result is a DRMP preferred alternative that is not consistent with local land use management standards to the maximum extent possible. Indeed, the DRMP ignores Wayne County plan amendments regarding the Factory Butte area.	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. FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with the state and local plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolved to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). Thus, while county and Federal planning processes, under FLPMA, are required to be as consistent as practical, the Federal agency planning process is not bound by or subject to county plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	BLM has a duty to work openly and in good faith with, and involve, County Plaintiffs, as cooperating agencies, in the planning processes to ensure that the resulting federal land use plan will fully and fairly consider the concerns of local governments and will be consistent to the "maximum extent" possible with local plans. (18)	The BLM gave careful and thorough consideration to the concerns and input of local governments throughout the planning process. Cooperating agencies, including the counties, have been active participants during the planning process.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	BLM has failed or refused to cooperate with County Plaintiffs, as required in FLPMA Sec. 202(c)(9), NEPA, and in the above cited cooperation regulations MOUs, to develop permenent OHV designations for the Factory Butte area, including regarding the DRMP, leaving the DRMP a sham.	BLM gave careful and thorough consideration to the concerns and input of local governments throughout the planning process. Cooperating agencies, including the counties, have been active participants during this planning process.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	When it issued the Travel Restrictions, BLM had never revealed or shared relevant inventories and data with Plaintiffs, including County Plaintiffs. BLM has never revealed or shared relevant inventories and data with Plaintiffs, including County Plaintiffs, leaving the DRMP a sham.	The Factory Butte emergency closure and subsequent travel restrction are independent of and beyond the scope this RMP planning process. Furthermore, this BLM emergency closures did not require public review nor disclosure of rare, sensitive and federally protected resources. The BLM Richfield Field Office staff held regular meetings with Garfield and Wayne County during the development of the Draft RMP/EIS. The BLM will continue to involve cooperating agencies during the RMP planning process.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	By excluding considerations of environmental and socioeconomic impacts of permanent changes to the Factory Butte area and predetermining such permanent changes before, and by, the sham EA and DRMP (21), BLM has violated its discrete action duties under these regulations to develop the RMP/EIS collaboratively with County Plaintiffs.	The Factory Butte Environmental Assessment is an activity level action that is being prepared pursuant to the applicable legal requirements, and is independent of and out the scope of this planning process. Further, the commentor incorrectly claims the BLM has made "permanent" changes to Factory Butte area. Contrariwise, the BLM developed the Draft RMP for analytical purposes only and has made NO decision. The Draft RMP Chapter 4 includes an analysis of environmental and socioeconomic impacts. Further, the Draft RMP includes an alternative to leave 199,700 acres open to cross country OHV use (see Draft page 2-7). The BLM Richfield Field Office staff held regular meetings with Garfield and Wayne County during the development of the Draft RMP/EIS. The BLM will continue to involve cooperating agencies during the RMP planning process.	Consultation and Coordination

Commentor	Affiliation	Comment	Comment Summary Response	Category
Paul Mortensen	Hanks & Mortensen P.C.	BLM has violated 43 C.F.R. Sec. 1610.4-3 by withholding inventories from County Plaintiffs and/or by failing to consider and prepare the following necessary inventories concerning the Factory Butte area cooperatively with County Plaintiffs: T&E species inventory, cross-country OHV use and demands inventory, existing routes inventory, RS 2477 inventory, and local OHV socio-economic dependence inventory. Facts Secs. 36, 48.k, 49, 50.	As described in the Draft RMP/EIS, the BLM used a variety of methods to inventory existing routes/ways within the Richfield Field Office for consideration in the planning process, including Global Positioning System Data (when available), data provided by the counties, map, and orthophoto data and staff/cooperator knowledge. However, site-specific locations of sensitive resources (such as threatened and endangered species or cultural resources) are specifically prohbited from public release by BLM policy for the protection of the resources. Habitat information was provided and findings were reviewed with the cooperating agencies. Cooperating agency status was extended to to Federal, State and local agencies, including Garfield and Wayne County. the BLM Richfield Field Office staff held regular meetings with Garfield and Wayne Counties during the development of the Draft RMP RMP/EIS. The BLM will continue to involve cooperating agencies during the RMP planning process.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	BLM has violated 43 C.F.R. Sec. 1610.4-4 by withholding inventories from and refusing to prepare inventories collaboratively with, County Plaintiffs, and by failing to analyze the management situation, consistent with multiple use principles reasonable alternatives under the RMP/EIS.	As described in the Draft RMP/EIS, the BLM used a variety of methods to inventory existing routes/ways within the Richfield Field Office for consideration in the planning process, including Global Positioning System Data (when available), data provided by the counties, map, and orthophoto data and staff/cooperator knowledge. However, site-specific locations of sensitive resources (such as threatened and endangered species or cultural resources) are specifically prohbited from public release by BLM policy for the protection of the resources. Habitat information was provided and findings were reviewed with the cooperating agencies. Cooperating agency status was extended to to Federal, State and local agencies, including Garfield and Wayne County. the BLM Richfield Field Office staff held regular meetings with Garfield and Wayne Counties during the development of the Draft RMP RMP/EIS. The BLM will continue to involve cooperating agencies during the RMP planning process. The FLPMA make it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use..." (FLPMA, Section 103 (c)). The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including motorized recreation, as well as conserving and protecting other resource values for current and future generations.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	BLM has also violated 43 C.F.R. Sec. 1610.4-4 by failing to cooperate with County Plaintiffs to analyze cross-country OHV demand forecasts and analyses relevant to the Factory Butte area, opportunities to resolve public issues and management concerns, and degree of local dependence upon cross-country OHV use in the Factory Butte area.	As described in the Draft RMP/EIS, the BLM used a variety of methods to inventory existing routes/ways within the Richfield Field Office for consideration in the planning process, including Global Positioning System Data (when available), data provided by the counties, map, and orthophoto data and staff/cooperator knowledge. However, site-specific locations of sensitive resources (such as threatened and endangered species or cultural resources) are specifically prohbited from public release by BLM policy for the protection of the resources. Habitat information was provided and findings were reviewed with the cooperating agencies. Cooperating agency status was extended to to Federal,	Consultation and Coordination

Commentor	Affiliation	Comment	Comment Summary Response	Category
			State and local agencies, including Garfield and Wayne County. the BLM Richfield Field Office staff held regular meetings with Garfield and Wayne Counties during the development of the Draft RMP RMP/EIS. The BLM will continue to involve cooperating agencies during the RMP planning process. The FLPMA make it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use..." (FLPMA, Section 103 (c)). The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including motorized recreation, as well as conserving and protecting other resource values for current and future generations.	
Paul Mortensen	Hanks & Mortensen P.C.	Re: 1.6.1. The DRMP incorrectly references the "General Plan for Wayne County, 1994," failing to recognize Wayne County's February 20, 2007 amendment to the General Plan which specifically addresses the Factory Butte area. BLM has failed to recognize the amendment in reaching its preferred alternative and in addressing its duty to have its plan conform to Wayne County's plan to the maximum extent possible.	The BLM Richfield Field Office is aware that Wayne County may have updated its General Management Plan in 2007. The revised General Management Plan was provided to BLM very late in the planning process and has been considered in development of the Proposed RMP/Final EIS.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. FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with the state and local plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolved to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). Thus, while county and Federal planning processes, under FLPMA, are required to be as consistent as practical, the Federal agency planning process is not bound by or subject to county plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	Re: 3.4.4.1, and re. p. 4-129, 4-136. These sections in relevant parts refers to the temporary order restricting 142,023 acres of land because "OHVs are causing or will cause considerable adverse effects upon threatened and endangered plant species in the area." The sections mention that the temporary order will end when "the RFO DRMP becomes final." This sections do not make any determination whether permanent restriction of the 142,023 is necessary. The temporary order was entered without any public or county input. Neither the County nor the public have had a meaningful opportunity to examine data and to comment regarding T&E species. In fact, in violation of the FLPMA, regulations and MOUs BLM has even refused to share information with the County. As previously discussed above, T&E species were not identified as important to OHV issues during scoping and this issue	Threats to threatened and endangered species in the Factory Butte area were first identified as an issue in the 1982 Henry Mountains MFP. Protection of threatened and endangered species in the Factory Butte area has been a management issue ever since and has been carried forward as a management issue in the RMP process by BLM staff. The BLM gave careful and thorough consideration to the concerns and input of local governments throughout the planning process. Cooperating agencies, including the counties, have been active participants during this planning process. Cooperating agency status was extended to Federal, State, and local agencies, including Garfield and Wayne Counties. The BLM Richfield Field Office staff held regular meetings with Garfield and Wayne Counties during the development of the Draft RMP/EIS.	Consultation and Coordination

Commentor	Affiliation	Comment	Comment Summary Response	Category
		relative to the Factory Butte area subsequently developed. Yet BLM has never invited or allowed additional comments on this newly arisen issue. Again, Plaintiffs, even if invited, could not meaningfully comment since, BLM has concealed the data.		
Paul Mortensen	Hanks & Mortensen P.C.	Failure to abide by MOUs and to utilize expertise of Counties. BLM has deliberately failed to consult with and utilize county data and county officials to develop meaningful T&E species analysis of the Factory Butte area. BLM has deliberately failed to develop a cooperative strategy towards preserving cross-country OHV recreation while protecting T&E species.	BLM gave careful and thorough consideration to the concerns and input of local governments throughout the planning process. Cooperating agencies, including the counties, have been active participants during this planning process. The BLM Richfield Field Office staff held regular meetings with Garfield and Wayne Counties during the development of the Draft RMP/EIS.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	Re: 3.6.1.1 This section quotes the Wayne County plan from 1994 and ignores Wayne County's February 20, 2007 plan amendment (copy provided herewith) regarding management of the Factory Butte area.	The BLM Richfield Field Office is aware that Wayne County may have updated its General Management Plan in 2007. The revised General Management Plan was provided to BLM very late in the planning process and has been considered in development of the Proposed RMP/Final EIS.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. FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with the state and local plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolved to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). Thus, while county and Federal planning processes, under FLPMA, are required to be as consistent as practical, the Federal agency planning process is not bound by or subject to county plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	Failure to abide by MOUs and to utilize expertise of Counties. BLM has deliberately failed to utilize county data and county officials to develop meaningful socioeconomic analysis of the Factory Butte area or to develop a cooperative strategy towards managing cross-country OHV recreation while protecting T&E species. Local businesses reported a 20% decline in revenues after the temporary restrictions were put in place. Why does the socioeconomic analysis ignore these facts?	BLM gave careful and thorough consideration to the concerns and input of local governments throughout this planning process. Cooperating agencies, including the counties, have been active participants during the development of alternatives and the RMP process. The Counties have not presented any credible, peer review socioeconmic studies to support their assertions. Throughout the DRMP/DEIS, the BLM recognizes the value of recreation and tourism to the local economy. The comentors concerns are generally addressed in the Draft RMP 4.6 Impacts to the Social and Economic Environment. The range of alternatives also includes the identification of 199,700 acres open to cross country OHV use in the Factory Butte area.	Consultation and Coordination
Paul Mortensen	Hanks & Mortensen P.C.	FLPMA section 202(c)(9) mandates that BLM maximize consistency with local government plans. BLM must work directly with county governments and cannot avoid them by working only through the governor's consistency review. FLPMA does not authorize BLM to allow the governor's office to override local government concerns. No	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. FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with State and local plans, to the maximum extent possible by law, and	Consultation and Coordination

Commentor	Affiliation	Comment	Comment Summary Response	Category
		regulation can override FLPMA section 202(C)(9).	inconsistencies between Federal and non-Federal government plans be resolved to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). A Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.	
Paul Mortensen	Hanks & Mortensen P.C.	Further administrative action, other than BLM's withdrawal of the EA,(16) will not solve the problem, but leave the EA proposal, and the RMP/EIS, including the DRMP, only "an evidently pro forma public opportunity to comment," Davis, id., and "a hollow exercise," Calvert Cliffs' Coordinating Comm. Inc., v. United States Atomic Energy Comm., 449 F.2d 1109, 1128 (D.C. App. 1971).	The Factory Butte Environmental Assessments (EA) is an activity-level planning action, separate from and outside the scope of the Richfield RMP land use planning process. The BLM has followed the land use planning process properly and has involved the public throughout. The public participation process is outlined in Chapter 5 of both the Draft and Proposed RMPs. The Richfield RMP Communication Plan afforded many opportunities for public involvement.	Process and Procedures
Paul Mortensen	Hanks & Mortensen P.C.	This further means that, to meaningfully and timely participate in the still-pending RMP/EIS under FLPMA Sec. 202, BLM must allow Plaintiffs to meaningfully participate and comment regarding the new information and/or proposed action changes. BLM has unlawfully withheld or unreasonably delayed these mandatory opportunities from Plaintiffs in preparing the DRMP.	BLM gave thorough and careful consideration to the concerns and input of local governments throughout the planning process. Cooperating agencies, including the counties, have been active participants during this planning process.	Process and Procedures
Paul Mortensen	Hanks & Mortensen P.C.	The socioeconomic analysis fails to consider the importance of family cross-country OHV recreation, which will be eliminated by the preferred alternative and by more restrictive alternatives.	Although the commentor refers to cross-country travel in general terms, the BLM assumes that this comment addresses Factory Butte, as the counties represented by the commentor reference Factory Butte specifically in their attachments to the commentor's letter. Additionally, the comment refers to "Factory Butte" 124 instances in the 47 page comment letter. The BLM acknowledges the social values to which the commentor refers. The preferred alternative in the PRMP/FEIS has been revised to include the Factory Butte OHV open area.	Socioeconomics
Paul Mortensen	Hanks & Mortensen P.C.	The socioeconomic analysis mostly ignores county-by-county analysis, lumping all together. There is no acknowledgement or analysis of the critical importance of cross-country OHV use to Wayne County or Garfield County. BLM has left itself ignorant of the specific economic and social impacts of its proposed alternative and more restrictive alternatives. The analysis relies upon State of Utah assumptions regarding population growth that were made while the Factory Butte area was unrestricted and has failed to adjust for the effects additional OHV and multiple use restrictions on future population negative growth.	On Jan 28, 2008, The BLM RFO received several studies and a proposal from The State of Utah including: • (copy of) Wayne, Sevier, and Garfield Counties proposal concerning OHV use in the Factory Butte area titled January 21, 2008 Draft of Counties' Comments Re Factory Butte Recreation Plan: Comments of Wayne, Sevier, and Garfield Counties Regarding Motorized Recreation Plan Around the Factory Butte Area in Wayne County, • Utah State University, 2007, Utah Public Lands Study: Key Social Survey Findings for Garfield, Piute, Sanpete, Sevier, and Wayne Counties, and • Utah State University, October 2006, Review of the Socioeconomic Analysis in the Draft EIS prepared by the USDI – BLM RFO (sometimes referred to as the Six County Association of Governments (AOG) study). Although the commentor refers to cross-country travel in general terms, the BLM assumes that this comment addresses Factory Butte, as the counties represented by the commentor reference Factory Butte specifically in their attachments to the commentor's letter. Additionally, the	Socioeconomics

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			comment refers to “Factory Butte” 124 instances in the 47 page comment latter. The BLM acknowledges the social values to which the commentor refers. The preferred alternative in the PRMP/FEIS has been revised to include the Factory Butte OHV open area.. The Utah Public Lands Study: Key Social Survey Findings for Garfield, Piute, Sanpete, Sevier, and Wayne Counties was considered for insights into local community social values. The BLM acknowledges the currency and relevance of several of the study’s findings, and has incorporated discussion of those topics in appropriate sections of Chapters 3 and 4. However, as the study itself suggests, interpretations are best done for the State of Utah as whole rather than at the county level because of the small number of respondents in some counties such as Piute and Wayne Counties. The AOG study expressed concerns with analyses of livestock grazing, oil and gas production, socioeconomic groups, and OHV use in the counties. The AOG study was a critique of the original DEIS; the current, public DEIS has been modified considerably, and has taken into account, directly or indirectly, many of the concerns expressed in the original AOG critique. In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Alternative A favors mineral development over protection of resources. Alternative C of the Draft RMP/EIS favors the protection of resources over the extraction of mineral development. Alternative D is the same as Alternative C except it includes management of lands with wilderness characteristics to preserve those characteristics. Alternative B is designed to be a balance between mineral development and protection of resources. Table 2.1 in the Richfield DRMP/DEIS provides in comparative form the management actions associated with each alternative. The DEIS/DRMP analyzes impacts from the action alternatives on a landscape basis, using as its geographical scope the Richfield planning area. The BLM has not been provided with data to suggest that a more micro analysis would produce a different set of alternatives or different analytical results.	

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Paul Mortensen	Hanks & Mortensen P.C.	Particularly revealing of BLM's generalized ignorance (28) are "Impacts from Recreation" at pages 4.459-60 and "Impacts from Travel Management" at pages 4.460-61. The sections do not discuss counties separately and are filled with statements such as, "Given the lack of data...," "Due to insufficient data, economic differences between the alternatives could not be quantified," and "although these [OHV recreation use] increases are not quantifiable with existing data." Regarding travel management, the DRAM says, "Demand for OHV recreation is likely to increase over time in the RFO, although these increases are not quantifiable with existing data."	Much of this comment reflects opinion, and does not provide the BLM with anything upon which it can act. However, based on other comments from the commentor, it appears the commentor may again be referring to values, particularly regarding OHV use, addressed in several other studies. On Jan 28, 2008, The BLM RFO received several studies and a proposal from The State of Utah including: • (copy of) Wayne, Sevier, and Garfield Counties proposal concerning OHV use in the Factory Butte area titled January 21, 2008 Draft of Counties' Comments Re Factory Butte Recreation Plan: Comments of Wayne, Sevier, and Garfield Counties Regarding Motorized Recreation Plan Around the Factory Butte Area in Wayne County, • Utah State University, 2007, Utah Public Lands Study: Key Social Survey Findings for Garfield, Piute, Sanpete, Sevier, and Wayne Counties, and • Utah State University, October 2006, Review of the Socioeconomic Analysis in the Draft EIS prepared by the USDI – BLM RFO (sometimes referred to as the Six County Association of Governments (AOG) study). The Utah Public Lands Study: Key Social Survey Findings for Garfield, Piute, Sanpete, Sevier, and Wayne Counties was considered for insights into local community social values. The BLM acknowledges the currency and relevance of several of the study's findings, and has incorporated them in appropriate sections of Chapters 3 and 4. However, as the study suggests, interpretations are best done for the State of Utah as whole rather than at the county level because of the small number of respondents in some counties such as Piute and Wayne Counties. The AOG study expressed concerns with analyses of livestock grazing, oil and gas production, socioeconomic groups, and OHV use in the counties. The AOG study was a critique of the original DEIS; the current, public DEIS has been modified considerably, and has taken into account, directly or indirectly, many of the concerns expressed in the original AOG critique. In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Alternative A favors mineral development over protection of resources.	Socioeconomics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			Alternative C of the Draft RMP/EIS favors the protection of resources over the extraction of mineral development. Alternative D is the same as Alternative C except it includes management of lands with wilderness characteristics to preserve those characteristics. Alternative B is designed to be a balance between mineral development and protection of resources. Table 2.1 in the Richfield DRMP/DEIS provides in comparative form the management actions associated with each alternative. The DEIS/DRMP analyzes impacts from the action alternatives on a landscape basis, using as its geographical scope the Richfield planning area. The BLM has not been provided with data to suggest that a more micro analysis would produce a different set of alternatives or produced different analytical results.	
Paul Mortensen	Hanks & Mortensen P.C.	The DRMP also fails to meaningfully evaluate the social impacts. There is no assessment of family demands for cross country outing and BLM's extensive elimination of family cross-country riding opportunities even as demand for such recreation is increasing. Factory Butte cross-country travel is a scarce resource which BLM is bound to consider and address. FLPMA Sec. 202(c)(6). Yet there is nothing in the analysis and BLM has again omitted county involvement.	The commentor refers to cross-country travel in general terms, and specifically with respect to Factory Butte. The BLM acknowledges the social values to which the commentor refers. The PRMP/FEIS has been revised to include the Factory Butte OHV open area.. It appears the commentor may be referring to values, particularly regarding OHV use, addressed in several other studies. On Jan 28, 2008, The BLM RFO received several studies and a proposal from The State of Utah including: • (copy of) Wayne, Sevier, and Garfield Counties proposal concerning OHV use in the Factory Butte area titled January 21, 2008 Draft of Counties' Comments Re Factory Butte Recreation Plan: Comments of Wayne, Sevier, and Garfield Counties Regarding Motorized Recreation Plan Around the Factory Butte Area in Wayne County, • Utah State University, 2007, Utah Public Lands Study: Key Social Survey Findings for Garfield, Piute, Sanpete, Sevier, and Wayne Counties, and • Utah State University, October 2006, Review of the Socioeconomic Analysis in the Draft EIS prepared by the USDI – BLM RFO (sometimes referred to as the Six County Association of Governments (AOG) study). The Utah Public Lands Study: Key Social Survey Findings for Garfield, Piute, Sanpete, Sevier, and Wayne Counties was considered for insights into local community social values. The BLM acknowledges the currency and relevance of several of the study's findings, and has incorporated them in appropriate sections of Chapters 3 and 4. However, as the study suggests, interpretations are best done for the State of Utah as whole rather than at the county level because of the small number of respondents in some counties such as Piute and Wayne Counties. The AOG study expressed concerns with analyses of livestock grazing, oil and gas production, socioeconomic groups, and OHV use in the counties. The AOG study was a critique of the original DEIS; the current, public DEIS has been modified considerably, and has taken into account, directly or indirectly, many of the concerns expressed in the original AOG critique. In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the	Socioeconomics

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			resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, five alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Alternative A favors mineral development over protection of resources. Alternative C of the Draft RMP/EIS favors the protection of resources over the extraction of mineral development. Alternative D is the same as Alternative C except it includes management of lands with wilderness characteristics to preserve those characteristics. Alternative B is designed to be a balance between mineral development and protection of resources. Table 2.1 in the Richfield DRMP/DEIS provides in comparative form the management actions associated with each alternative. County involvement was incorporated in the RMP/EIS process. This occurred through the cooperating agency process, and by including and considering written statements by the counties regarding resource management. Selections from the County Plans were considered for socioeconomics in section 3.6.1 and 4.6.1. Appendix 13 summarizes Appendix 13 summarizes statements, comments, and direction provided by the counties on public land and resource management contained in the general plans of the five counties encompassed by BLM's Richfield Field Office.	
Paul Mortensen	Hanks & Mortensen P.C.	Many areas closed under the temporary restrictions do not have any populations of cacti. Alternative B and other restrictive porposals are overly broad. The temporary restrictions were allegedly necessary only in "isolated locations" per BLM's letter to SUWA dated April 7, 2006, not over hundreds of thousands of acres. BLM's permanent OHV standards for the Factory Butte area should deal with isolated locations with only the most minimal resrictions from open travel.	The Factory Butte emergency closure order is independent of and outside the scope of this RMP planning process. Further, the BLM has no duty to obtain input from the public prior to issuing a restriction order under the 43 CFR. Threats to threatened and endangered species in the Factory Butte area were first identified as an issue in the 1982 Henry Mountains MFP. Protection of threatened and endangered species in the Factory Butte area has been a management issue ever since and has been carried forward as a management issue in the RMP process by BLM staff.	Travel Management – OHV Area Categories
Paul Pace Paul.Pace@ut.usda.gov		I question why in the socio/economic analysis of the preferred alternative B the BLM has never referenced any of the County General plans? Each county in the management district has a General Plan. Was this an intentional omission, did the BLM choose to ignore the county commissioners management decisions in the RMP process? I would think for this Draft RMP to have validity the county planning process should have been included	The DRMP/DEIS does reference County Plans. Selections from the County Plans are provided in the socioeconomics overview in section 3.6.1.1. Also, Appendix 13 summarizes statements, comments, and direction provided by the counties on the public land and resource management contained in the general plans of the five counties encompassed by the BLM's Richfield Field Office.	Socioeconomics
Paul Roales		Scouting and family picnic opportunities are obviously important in the area and these should be taken into account when considered group	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		size limits like those proposed.	and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	
Paul Westcott suwa@suwa.org	SUWA	Please reconsider the Travel Plan and keep the ORVs far away from the Dirty Devil area.	None of the alternatives propose the Dirty Devil River area as open to OHVs. Motorized use would be limited to designated routes or closed.	Travel Management – OHV Area Categories
Phil Raider suwa@suwa.org		Having spent some time in Utah,specifically the Dirty Devil area, and after analyzing your plans for roads and recreational ORV trails in the area, I am very convinced and concerned that your preferred alternative for the Travel Plan would severely damage the beauty and recreational value of the land for campers, hikers, trail runner, back-country horsemen, and everyone who does not go into the area with the primary aim of pursuing a gasoline-driven power-sport. A more environmentally-friendly plan, one that provdides true open space (areas where I can get at least a mile or two away from the nearest road) would serve my, and many others needs far better than your preferred alternative, which pretty much fails to provide such areas altogether. The Dirty Devil is no place for a designated route. It has many unique, rare values that will be greatly diminished or wiped out altogether under the multiple impacts that would ensue from a motorized route being designated there. This plan will be in effect for many years, perhaps several decades. If the number of ORV users in Utah and in the surrounding states continues to grow at rates similar to recent years, the impacts to this canyon could be devastating. Please take time to physically visit every route you have included in your travel plan. I have a hard time believing that you would choose to designate a route in The Dirty Devil once you have actually seen it with your own eyes. Thank you for your time.	None of the alternatives propose the Dirty Devil River area as open to OHVs. Motorized use would be limited to designated routes or closed.	Travel Management – OHV Area Categories
Phillip Pace cathy@boulder mountainrealty.com		The purpose of this letter is to comment on the BLM Resource Management Plan for Wayne County that was issued in October 2007. I arn completely opposed to Designated Wilderness Areas and Wilderness Study Areas. I have had to continue my livestock operation and grazing permits with the extreme disadvantage of wildemess areas. In the BLM Resource Management Plan, more areas are designated as "non-WSA lands with wilderness characteristics". This is an intrusion on our rights to operate on public lands. It is also a false, nebulous category of public lands. Either the land is under Designated Wilderness Areas or Wilderness Study Area or it is not. This expansion of wilderness areas is contrary to the legislation that was passed that created the wilderness areas. These lands were originally omitted from the wilderness areas because they were not wilderness. In the time that has passed since the legislation, more, not less activity is taking place on the lands you designated as having wilderness characteristics. Wild Horse Mesa	BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." FLPMA, Section 103(c) (43 U.S.C. §1702(c)). FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations.	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
		consisting of 88,300 acres does not have wilderness characteristics. Roads, mining claims and the remnants and refuse of old mining activity are common throughout the region. Grazing and man made ponds are other signs of human activity and disturbance. The scenery is not appealing. This area should be removed from the classification of having wildemess characteristics. The Miner's Mountain area can hardly be considered as having wilderness characteristics. There are several well traveled roads throughout. The citizens of Wayne County use the area as a place to gather firewood. On any given day, the sounds of chainsaws and trucks are the complete opposite of a wilderness characteristic. The State Trust Lands have sections that have oil wells and other extraction activity that is noisy and at times over the years has required large trucks driving in the area. The Park Service has a cell phone tower permit. There are grazing permits and ponds and railed portions. The land has been tom up in a serious way over the years because of mining activity and road making. While this has been necessary for the economy of Wayne County, it is evidence that there are no wildemess characteristics on Miner's Mountain. There is neither view, nor silence, nor condition of landscape that give the land any wilderness characteristics. I want to express my opposition to the consideration of land with wilderness characteristics. I am not a recreationalist. I am tryrng to make a living and make use of the grazing permits that I have paid for and am entitled to use. I ask that you remove the Wild Horse Mesa area from this classification because it does not qualify for the reasons I stated. In addition, I want to express my opposition to the Miner's Mountain area classified as having wilderness characteristics. I also disagree strongly with the Fremont Gorge/Cockscomb "Potential Area of Critical Environment Concern", an area that includes Miner's Mountain. I ask that you withdraw the Miner's Mountain area from any of these classifications for the specific reasons that I have stated in this letter.		
Ralph Roberts		Climate warming poses significant dangers to us as a civilization and we must do everything possible to combat it. This includes eliminating ORV use wherever possible, asthese vehicles are some of the most polluting vehicles in existence.	While uncertainties remain about global warming and climate change, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.	Scope of Document
Ralph Roberts		I am writing to ask you to abandon any plans to open the Dirty Devil River area to ORV's. I have spent many vacations in the Utah backcountry, and count it as some of the most beautiful country I have	None of the alternatives propose the Dirty Devil River area as open to OHVs. Motorized use would be limited to designated routes or closed.	Travel Management – OHV Area

Commentor	Affiliation	Comment	Comment Summary Response	Category
		evervisited. One of its most valuable features for measa hiker and camper is the peace and solitude one finds in areas likethe Dirty Devil. Opening that and other areas to ORV use would destroy the unique character of the land that draws many of us to Utah.		Categories
Randy Parker	Utah Farm Bureau Federation	Suggestions within the RMP that reduced grazing decreases erosion is contrary to science. Most of the soils are heavy clay, resisting water infiltration. Grazing disturbs the surface crust, allowing moisture into the soil and fertilizer perpetuating plant germination.	The Draft RMP/EIS does not include any alternatives that consider decreases in livestock grazing, therefore this comment does not apply to this document.	Livestock Grazing
Randy Parker	Utah Farm Bureau Federation	Farm Bureau is opposed to the BLM's use of the RMP process to retain federal ownership of the federal lands in violation of the equal footing doctrine of the U.S. Constitution and other pertinent federal law, including FLPMA.	The land tenure adjustment critieria is listed in Appendix 5 of the Draft RMP/EIS. Public lands must meet one or more of the criteria in Appendix 5 to be considered for any form of land tenure adjustment. The RMP process is mandated by Federal law, specifically FLPMA.	Process and Procedures
Randy Ramsley		Land management within the Factory Butte bioregion should consider tourism as a major contributor to the economics of the area and should recognize the true value of wilderness.	The DRMP/DEIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. BLM believes the preferred alternative appropriately balances recreation and extraction activities to best support local economies. BLM also considered a copy of Wayne, Sevier, and Garfield Counties proposal concerning OHV use in the Factory Butte area titled January 21, 2008 Draft of Counties' Comments Re Factory Butte Recreation Plan: Comments of Wayne, Sevier, and Garfield Counties Regarding Motorized Recreation Plan Around the Factory Butte Area in Wayne County. The PRMP/FEIS has been revised to include the Factory Butte OHV open area.. The BLM acknowledges the values the commentor refers to and the potential importance of more primitive forms of recreation to the economies of local communities in its inclusion of the Capitol Reef Gateway and Henry Mountains SRMAs in the preferred alternative. A qualitative description of the potential importance is provided in the RMP chapter 4 Alternative B section.	Socioeconomics
Randy Ramsley		At Page 20 of the document "Mancos Shale Literature Review on the Colorado Plateau" a study conducted on the Grand Valley Mancos Shale concluded ... "The badlands are the least stable landform, releasing more sediment and salt into the runoff than the other landforms." It is fairly safe to say that the Mancos badlands around Factory Butte are also highly erosive. It may also be safe and prudent to assume that the mechanical crust that covers the soil is effective at minimizing the erosion. The report prepared for the BLM "Accelerated erosion in areas disturbed by OHV activity in the Mancos Shale badlands of the Factory Butte-North Caineville Mesa area, Wayne County, Utah" by John C Dohrenwend. PhD certainly supports this supposition. Jayne Belnap PhD conducted a study and states that the Mancos formations located in the Moab area "... were not the most erodible of all the units tested, they still produced huge amounts of sediment when disturbed (up to 45 times the undisturbed)(the sediment figure). In addition, they took only 1/3 the wind to move once disturbed (the TFV figure..• "	BLM understands that the Mancos Shale badlands are unstable and highly erosive, high in salts and selenium, soil crust helps stabilize soil, and that OHVs most likely increase erosion. Dohrenwend's study focused on heavily used steep hillslopes vs. undisturbed hillslopes and indicated that OHV use greatly increases erosion rates. However, many acres of Mancos shale soil are not located on steep slopes but include flat benches, rolling topography, and valleys. Of the steep Mancos shale slopes that are present, not all slopes are used by OHVs, and of the slopes used, many are not used heavily. When considering the total area encompassed by Mancos shale in the Factory Butte area BLM concludes there are many more steep slopes that are not heavily used as opposed to those that are heavily used. In the Factory Butte area there are several scattered Mancos shale areas where concentrated and heavy OHV use occurs on steep slopes. The heaviest use occurs in the Swing Arm City area; and even in that area, the majority of Mancos shale areas containing steep slopes do not receive heavy use. The hillslope acreage impacted by heavy OHV use is relatively small. BLM acknowleges there is increased erosion from steep, heavily ridden hillsides but we do not presently have any quantitative information concerning how many	Soil Resources

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			hillslope acres are actually being impacted by heavy OHV use. To what extent total erosion is increased and what impact, if any, it is having on the Fremont River is unknown. We have no water quality data suggesting that OHV use is the cause of any water quality exceedences.	
Randy Ramsley		There is also data available that suggests that the mechanical crust that covers and stabilizes the Mancos Shale badlands is also relatively low in selenium and other salt generating elements, probably because the heavy metals and salts have already washed out of the crust. These studies also indicate that if this crust is disturbed and blown or washed away, the exposed soil will be higher in the elements that negatively impact the general environment. On Page 17 of the Mancos Shale Literature Review material there is a study that states, "Water extracts from un-weathered shale yields much higher quantities of Na (and higher Mg in most cases) than did comparable extracts from partially weathered shale." A study being conduced on Mancos soils in Colorado and released by the USGS states "Calculations indicate that 4 to 5 kg extractable salt/eu m and 0.2 to 0.4 g extractable Se/cu m are stored in Mancos soil on the NCA. If salt-laden horizons are disturbed and brought to the surface where they are out of equilibrium with the weathering environment, large amounts of these salt and Se loads will be available for rapid mobilization." A letter to the BLM from Carl Adams, an environmental scientist and the Watershed Coordinator for the Utah Division of Water Quality states, pertaining to cross country travel in the Neilson Wash area, "All of these factors indicate that the potential for increased sediment and TDS loading to the Fremont River is higher as a result of unrestricted OHV activity in the Neilson Wash area." Referring to the Blue Hills area, the MFP generated in 1980 by the BLM stated that "In those areas where the (orv) use is high and the vegetation density is low there will be significant adverse effects on the watershed." A study recently released by the USGS focuses on the Mancos Shale. The document, "Geomorphic Differences Between The Tunuk And Blaegate Members Of The Mancos Shale Near Caineville, Utah Wayne County Utah", tells us that the Blue Gate is high in selenium and also has the potential to generate high levels of salt. This study concludes, "The importance of adapting management practices to both subtle and obvious differences of Blue Gate and Tununk landscapes is related to the fragile nature of the landscapes, the potential for accelerated erosion due to anthropogenic influences, and ultimately to economic and environmental issues related to salinity, selenium, and sediment content of the Colorado River."	BLM understands that the Mancos Shale badlands are unstable and highly erosive, high in salts and selenium, soil crust helps stabilize soil, and that OHVs most likely increase erosion. We have no water quality data suggesting that OHV use is the cause of any water quality exceedences. Erosion rates usually increase in areas heavily used by OHVs. However, it is unclear to what degree OHVs have increased the rate of erosion over the natural erosion rate. Research efforts attempting to address that issue are currently ongoing in the Swing Arm City area. The lower Fremont River is not listed as being impaired by sediment or selenium. However, water quality standards and criteria adjacent to and downstream of Factory Butte are violated at very low flows when there is no upland runoff. This has persisted for a long period of time, predating the use of OHVs in the area. The commenter quoted Carl Adams saying “All of these factors indicate that the potential for increased sediment and TDS loading to the Fremont River are higher as a result of unrestricted OHV activity in the Neilson Wash area.” He forgot to mention Carl’s next sentence which was “However, based on observations that recent cross country OHV travel has been light there is currently only minimal concern, along with continued monitoring, with its designation as a play area.” He does also say “IF unrestricted OHV use were to substantially increase, particularly within the drainage channels of Neilson Wash, I would anticipate a greater likelihood for increased sediment and TDS loading into the Fremont River.” At the conclusion of Mr. Adams statement to the BLM he said “Based on the result of my observations and review of available information, the BLM’s preferred alternative B, along with continued monitoring, should be protective of water quality within the Fremont River.”	Soil Resources
Randy Ramsley		At page 4-24 regarding water quality of the Lower Fremont it is stated "Water quality relative to sediment content is best during periods of low flow; water quality relative to chemical content is best during high flow."	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL	Water Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		At page 4-28 the statement, "Water quality standards and criteria adjacent to and downstream of Factory Butte are violated at very low flows when there is no upland runoff." I'm wondering which statement is factual. How has the agency arrived at either of these assumption? The data I obtained from the Utah Division of Water Quality shows the highest levels of selenium occur during periods of high flow. For example, if I average the flow and compare selenium levels I find that there are more occurrences of selenium violations during periods when the flow is above average. This data contradicts the agencies previous statement, "water quality relative to chemical content is best during high flow." and suggests rather that runoff from the badlands is finding its way into the Fremont River. It should also be noted that selenium levels were not violated until 1996. Samples were taken beginning in 1992. Since 1996, there appear to be increasing levels of selenium violations. These violations could be ascertained to coincide with increasing levels of disturbed soils resulting from increased ohv activity within the Mancos Shale badlands. TDS levels were violated 30 times in the data period, 17 of these violations occurred when flows were below average. This data contradicts the statement, "Water quality relative to sediment content is best during periods of low flow;... ".	development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah's 303(d) list because a TMDL has been developed and approved. Violations of the water-quality criterion for total dissolved solids (TDS = 1200 mg/l) occur during low flows from June through September. The sources of TDS during these low flows, as per the TMDL, were natural background, irrigation return flows, and two flowing wells that contributed highly saline water to Caineville Wash which flows into the Lower Fremont. There is no runoff occurring during these low flows so there are no contributions from potential upland source areas such as Factory Butte. Also the data show that exceedances have been occurring since 1976 which predates the heavy use of the Factory Butte area for OHVs. BLM has capped the two wells thus fulfilling one of three major water-quality goals in the TMDL. Estimated savings was about 5,000 tons. There are insufficient data to detect a signature from the closing of the wells. The only station that has data that post dates the well closings is "at old U24 Xing" (20 samples). A major-ion analysis may show a difference but assigning that difference to the well closures would not be supportable. The data on selenium in the Fremont River are insufficient for anyone to claim that OHV use causes selenium levels to rise. The DEQ only reports one exceedence of the acute selenium criterion in 68 samples spanning a 34 year period, and DEQ does not list the Lower Fremont as being impaired by selenium. While some Mancos derived soils do contain selenium it is not ubiquitous. The "toxicity" of selenium depends on concentration. Increased erosion normally does occur in areas that are heavily used by OHVs. An increase in erosion does not immediately result in the delivery of the eroded soil particles and solutes to the perennial stream network especially in an arid desert environment. The Lower Fremont is not listed as being impaired by sediment, and at higher flows where upland runoff may be contributing the TDS concentrations are below the criterion. This lower watershed gets heavy loading from the Mancos on both sides of the river above Hanksville. The Bureau of Reclamation report (1986 or 87) estimated an average for the 1977- 80 period as 51,000 tons at the mouth of the Fremont, with about 30,000 tons at the Caineville gage station approximately 35 miles upstream. Division of Water Quality (DWQ) has a new water quality assessment program. Todate DWQ has primarily assessed the condition of the state's waters with water chemistry data. Recently, a model was completed that provides quantitative scores on the overall biological condition of streams based on the departure of macroinvertebrate assemblage composition from expected reference conditions.	

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			Model outputs are used to directly assess biological beneficial use support for many of Utah's streams and rivers, and this is planned to be incorporated for assessments into the upcoming 2008 Integrated Report (303(d) list & 305(b) report).	
Randy Ramsley		At page 4-25 the statement,... "Compared to other natural and human-caused factors affecting water quality within the planning area, proposed resource management plan decisions would have minor impacts on water quality." What does this statement mean? What data has been used to arrive at this assumption? It would seem to me that resource management decisions regarding land use are probably the single most important factor concerning the issues of water quality. Especially given the understanding that Mancos Shale is highly erosive and that Mancos contains high level of elements having negative impact on water quality it would seem that management decisions greatly affect the potential to reduced water quality.	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah's 303(d) list because a TMDL has been developed and approved. Violations of the water-quality criterion for total dissolved solids (TDS = 1200 mg/l) occur during low flows from June through September. The sources of TDS during these low flows, as per the TMDL, were natural background, irrigation return flows, and two flowing wells that contributed highly saline water to Caineville Wash which flows into the Lower Fremont. There is no runoff occurring during these low flows so there are no contributions from potential upland source areas such as Factory Butte. Also the data show that exceedances have been occurring since 1976 which predates the heavy use of the Factory Butte area for OHVs. BLM has capped the two wells thus fulfilling one of three major water-quality goals in the TMDL. Estimated savings was about 5,000 tons. There are insufficient data to detect a signature from the closing of the wells. The only station that has data that post dates the well closings is "at old U24 Xing" (20 samples). A major-ion analysis may show a difference but assigning that difference to the well closures would not be supportable. The data on selenium in the Fremont River are insufficient for anyone to claim that OHV use causes selenium levels to rise. The DEQ only reports one exceedence of the acute selenium criterion in 68 samples spanning a 34 year period, and DEQ does not list the Lower Fremont as being impaired by selenium. While some Mancos derived soils do contain selenium it is not ubiquitous. The "toxicity" of selenium depends on concentration. Increased erosion normally does occur in areas that are heavily used by OHVs. An increase in erosion does not immediately result in the delivery of the eroded soil particles and solutes to the perennial stream network especially in an arid desert environment. The Lower Fremont is not listed as being impaired by sediment, and at higher flows where upland runoff may be contributing the TDS concentrations are below the criterion. This lower watershed gets heavy loading from the Mancos on both sides of the river above Hanksville. The Bureau of Reclamation report (1986 or 87) estimated an average for the	Water Resources

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			1977- 80 period as 51,000 tons at the mouth of the Fremont, with about 30,000 tons at the Caineville gage station approximately 35 miles upstream. Division of Water Quality (DWQ) has a new water quality assessment program. Todate DWQ has primarily assessed the condition of the state's waters with water chemistry data. Recently, a model was completed that provides quantitative scores on the overall biological condition of streams based on the departure of macroinvertebrate assemblage composition from expected reference conditions. Model outputs are used to directly assess biological beneficial use support for many of Utah's streams and rivers, and this is planned to be incorporated for assessments into the upcoming 2008 Integrated Report (303(d) list & 305(b) report).	
Randy Ramsley		At 4-25, concerning Methods and Assumptions there is an assumption, "Increased erosion does not necessarily result in increased sedimentation to a perennial stream." What are the bases of this assumption? What studies can be referenced that do not indicate the increased sedimentation is directly linked to increased erosion?	Wind erosion does not deposit all material into perennial streams. Water erosion can also carry sediment to deposition zones which may not be perennial streams. The assumption has been changed in the Proposed RMP/Final EIS to state: "Increased erosion does not necessarily result in increased sedimentation to a perennial stream. For example, wind erosion could carry sediment to deposition zones which may not be perennial streams."	Water Resources
Randy Ramsley		Page 4-28 - ..."However, increased erosion does not immediately result in the delivery of eroded solid particles and solutes to a perennial stream, especially in an arid environment." What are the bases of this assumption? It is very probable that the first measurable rain will wash the disturbed soils into the streams. What difference does it make whether the eroded soils immediately or in the near future finds its way into the surface water? Why has this statement been included in assumptions? "Swingarm City drains into a broad alluvial fan before reaching the Fremont River." The alluvial fan that is Swingarm City probably does little to prevent sediment from reaching the Fremont River. The Fremont River is very close to Swingarm City. The culverts that run under Highway 24 and carry the water away from Swingarm City drain directly into an ever increasing backcut that runs from the Fremont River to the highway. There have been increasing instances where sediment from Swingarm City has washed across Highway 24. Is there any data to support the agencies assumption? Has a scientist or soil specialist surveyed the area and made this determination?	The impact analysis on page 4-28 of the Draft RMP/EIS has been revised in the Proposed RMP/Final EIS. The paragraph has been revised to read: "Erosion rates usually increase in areas heavily used by OHVs. However, increased erosion does not immediately result in the delivery of eroded solid particles and solutes to a perennial stream, especially in an arid environment. Swingarm City drains into a broad alluvial fan before reaching the Fremont River. The lower Fremont is not listed as being impaired by sediment or selenium. Water quality standards and criteria adjacent to and downstream of Factory Butte are violated at very low flows when there is no upland runoff. This has persisted for a long period of time, predating the use of OHVs in the area.	Water Resources
Randy Ramsley		Page 4-28 - The statement, "The compacted soils/bedrock and dispersed drainage minimize the potential for sediment and TDS to enter the Fremont River as a result of OHV activity." seems contradictory to what we know about soil compaction. What data is being used to make this assumption? Most data available indicates that compacted soils do increase the volume of sediments carried by runoff. And in fact the proceeding statement, "The analysis is based on the following assumptions: • Substantial surface disturbance to soil, including compaction of soil or loss of vegetative cover, could increase water	The impact analysis on page 4-28 of the Draft RMP/EIS has been revised in the Proposed RMP/Final EIS. The paragraph has been revised to read: "Erosion rates usually increase in areas heavily used by OHVs. However, increased erosion does not immediately result in the delivery of eroded solid particles and solutes to a perennial stream, especially in an arid environment. Swingarm City drains into a broad alluvial fan before reaching the Fremont River. The lower Fremont is not listed as being impaired by sediment or selenium. Water quality standards and criteria adjacent to and downstream of Factory Butte are violated at very low flows when there is no upland runoff. This has persisted for a long	Water Resources

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		runoff and downstream sediment loads, thereby degrading water quality, altering channel structure, and affecting overall watershed health.", appears to be exactly what is happening at Swingarm City. "	period of time, predating the use of OHVs in the area.	
Randy Ramsley		Page 4-28 - "The lower Fremont is not listed as being impaired by sediment or selenium." According to the Utah Division of Water Quality, the Lower Fremont is listed as an impaired system frequently exceeding MCL for tds as set for agricultural uses.	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah's 303(d) list because a TMDL has been developed and approved. Violations of the water-quality criterion for total dissolved solids (TDS = 1200 mg/l) occur during low flows from June through September. The sources of TDS during these low flows, as per the TMDL, were natural background, irrigation return flows, and two flowing wells that contributed highly saline water to Caineville Wash which flows into the Lower Fremont. There is no runoff occurring during these low flows so there are no contributions from potential upland source areas such as Factory Butte. Also the data show that exceedances have been occurring since 1976 which predates the heavy use of the Factory Butte area for OHVs.	Water Resources
Randy Ramsley		Page 4-28 - Water quality standards and criteria adjacent to and downstream of Factory Butte are violated at very low flows when there is no upland runoff. This has persisted for a long period of time, predating the use of OHVs in the area." Why has this statement been included within the drmp? How is this statement relative to the decisions? What data is the agency using to make this assumption? There is little data available to tell us what the water quality ofthe Fremont River was like before human activities began to change the stability of the soils within the area. The water diverting activities of the first settlers of the area through the construction of Highway 24 and the introduction of the off road machine have all had profound effects on the way water and soil react within these badlands. The wild flood irrigation practices have been determined to contribute to the tds violations occurring during periods of low flow. And the fact that these violations are occurring has no bearing on how we choose to manage the soil resources ofthe area. All data available to us today tells us that OHVs do indeed disturb soils and increase erosion, and therefore, OHV use or any soil disturbing activity on the Mancos Shale badlands can only be expected to contribute to increased levels of tds in the waters of the Fremont River.	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah's 303(d) list because a TMDL has been developed and approved. Violations of the water-quality criterion for total dissolved solids (TDS = 1200 mg/l) occur during low flows from June through September. The sources of TDS during these low flows, as per the TMDL, were natural background, irrigation return flows, and two flowing wells that contributed highly saline water to Caineville Wash which flows into the Lower Fremont. There is no runoff occurring during these low flows so there are no contributions from potential upland source areas such as Factory Butte. Also the data show that exceedances have been	Water Resources

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			occurring since 1976 which predates the heavy use of the Factory Butte area for OHVs. BLM has capped the two wells thus fulfilling one of three major water-quality goals in the TMDL. Estimated savings was about 5,000 tons. There are insufficient data to detect a signature from the closing of the wells. The only station that has data that post dates the well closings is “at old U24 Xing” (20 samples). A major-ion analysis may show a difference but assigning that difference to the well closures would not be supportable. The data on selenium in the Fremont River are insufficient for anyone to claim that OHV use causes selenium levels to rise. The DEQ only reports one exceedence of the acute selenium criterion in 68 samples spanning a 34 year period, and DEQ does not list the Lower Fremont as being impaired by selenium. While some Mancos derived soils do contain selenium it is not ubiquitous. The “toxicity” of selenium depends on concentration. Increased erosion normally does occur in areas that are heavily used by OHVs. An increase in erosion does not immediately result in the delivery of the eroded soil particles and solutes to the perennial stream network especially in an arid desert environment. The Lower Fremont is not listed as being impaired by sediment, and at higher flows where upland runoff may be contributing the TDS concentrations are below the criterion. This lower watershed gets heavy loading from the Mancos on both sides of the river above Hanksville. The Bureau of Reclamation report (1986 or 87) estimated an average for the 1977- 80 period as 51,000 tons at the mouth of the Fremont, with about 30,000 tons at the Caineville gage station approximately 35 miles upstream. Division of Water Quality (DWQ) has a new water quality assessment program. Todate DWQ has primarily assessed the condition of the state’s waters with water chemistry data. Recently, a model was completed that provides quantitative scores on the overall biological condition of streams based on the departure of macroinvertebrate assemblage composition from expected reference conditions. Model outputs are used to directly assess biological beneficial use support for many of Utah’s streams and rivers, and this is planned to be incorporated for assessments into the upcoming 2008 Integrated Report (303(d) list & 305(b) report).	
Randy Ramsley ramsley@mesa farm.com	Mesa Farm	Statement like, '...with few exceptions, all bodies of water are ok within the region', and conveniently leaving out the fact that the Fremont is still listed as impaired for class 4, agricultural uses. Or leaving the Lower Muddy off the 303 d list when in fact it is on the list as impaired for selenium.	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah’s 303(d) list because a TMDL has been developed and	Water Resources

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Randy Ramsley ramsley@mesa farm.com	Mesa Farm	Statements like, increased erosion does not necessarily mean increased sedimentation into perennial streams, or that the Swing Arm area drains into a large alluvial before reaching the Fremont, when in fact the disturbed soils are draining directly into the river.	Wind erosion does not deposit all material into perennial streams. Water erosion can also carry sediment to deposition zones which may not be perennial streams. The assumption has been changed in the Proposed RMP/Final EIS to state: "Increased erosion does not necessarily result in increased sedimentation to a perennial stream. For example, wind erosion could carry sediment to deposition zones which may not be perennial streams."	Water Resources
Randy Ramsley randyramsley@ wirelessbeehive .com		Statement like, '...with few exceptions, all bodies of water are ok within the region', and conveniently leaving out the fact that the Fremont is still listed as impaired for class 4, agricultural uses. Or leaving the Lower Muddy off the 303 d list when in fact it is on the list as impaired for selenium.	The Fremont River and tributaries from the confluence with the Dirty Devil River to the east boundary of Capitol Reef National Park is considered one assessment unit (AU) by the State of Utah and was identified as a high priority for TMDL development on the Utah 2000 303(d) list. Every AU on the 303(d) list is a category 5A unit. Category 5A means a TMDL is being developed or the Unit has a TMDL development priority assigned to it on the 303(d) list. In March of 2002 a TMDL was completed for the entire Fremont River watershed and all Category 5A assessment units in the watershed were reclassified as Category 4A. Category 4A means a TMDL has been completed for all pollutants. Category 4A assessment units are not listed in subsequent 303(d) lists so the Lower Fremont AU did not appear on the 2006 303(d) list for Utah. The Lower Fremont River has been removed from Utah's 303(d) list because a TMDL has been developed and approved. Violations of the water-quality criterion for total dissolved solids (TDS = 1200 mg/l) occur during low flows from June through September. The sources of TDS during these low flows, as per the TMDL, were natural background, irrigation return flows, and two flowing wells that contributed highly saline water to Caineville Wash which flows into the Lower Fremont. There is no runoff occurring during these low flows so there are no contributions from potential upland source areas such as Factory Butte. Also the data show that exceedances have been occurring since 1976 which predates the heavy use of the Factory Butte area for OHVs. The Utah 2006 Integrated Report published by the Utah Department of Environmental Quality indicates that Lower Muddy Creek from the confluence with the Fremont River to the Ivie Creek confluence is listed on the 303(d). The 303(d) list in the Proposed RMP/Final EIS has been revised to include to Lower	Water Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
			Muddy Creek.	
Raymond Berry		We object to the reduction in the number of ACEC's from 4 in the no action alternative incorporating 14,780 Acres to 1 ACEC in Alternative B, incorporating only 2530 acres. In our view, the analysis done with respect to that decision violates federal law.	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection ACEC. The BLM gave full consideration to the designation and preservation ACEC during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period. A total of 27 ACEC nominations were received and the relevance and importance of each were determined. Two of the ACEC nominations were found to meet both the criteria of relevance and importance and all these were included for special management as proposed ACECs in Proposed RMP. The BLM Manual 1613.23 states that “After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM’s proposals for designation and management of ACECs.” The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
			with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.	
Raymond Berry		The Richfield BLM district currently has 682,600 acres in 29 areas managed for preservation of wilderness characteristics. In the preferred alternative, the BLM proposes to manage zero acres to maintain wilderness characteristics. In our view, the analysis supporting the management directives for lands with wilderness characteristic in the preferred alternative, as well as Alternatives A & C violate federal law.	BLM has considered the proposals submitted by several commentors. The Proposed RMP/Final EIS has been revised to address the proposal and the commentors' concerns. The management suggested is included within the range of alternatives considered within the Draft RMP/EIS. IM 2003-275 Change 1 addresses this issue as to why the proposed management is consistent with Federal law.	Non-WSA Lands with Wilderness Characteristics
Raymond Berry		Please add our names to the list of individuals and organizations who have requested that the public comment period be extended to at least July 1, 2008. It is obvious that the 90 day public comment period is must to brief to allow the interested public a reasonable opportunity to review the DRMP, including its appendices and maps, and to prepare comments.	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held six open houses around the State to facilitate review of the Richfield DRMP/DEIS.	Process and Procedures
Raymond Berry		The DRMP describes 4,315 miles of routes. We object to that finding. The DRMP fails to describe in detail the criteria or the process that was used to identify these routes. We believe that the vast majority of the routes are simply illegally created user pathways that have never received any level of environmental analysis, and for that reason, they should not be included as in part of the "route" baseline data. For the purpose of OHV analysis, the starting point should be that user created pathways not shown on current travel maps should not be considered "routes" for the purpose of DRMP analysis. The default status of all such pathways should be "closed".	A variety of data sources were utilized in developing the route inventory. Criteria was set and ID Team meetings were held to analyze individual routes. Appendix 9 was added to the Final RMP EIS that describes the process used for route designations.	Travel Management – OHV Route Identification
Raymond Berry		We object to the reduction in the number of proposed Wild and Scenic Rivers segments from 12 in the no action alternative, incorporating 135 river miles, to 2 segments in Alternative B, incorporating only 29 miles. In our view, the analysis done with respect to that decision violates federal law.	The No Action Alternative includes all river segments that are considered eligible for Wild and Scenic River status; however, no suitability decisions (designating WSR status) have been made. Although all eligible segments are considered in the No Action Alternative, it does not mean all of the eligible segments are suitable for Wild and Scenic River status. Alternative B is the preferred alternative because it provides a balanced approach of protection/preservation of natural resources while providing for commodity production and extraction. Alternative B provides for Wild and Scenic River suitability with less management restrictions to allow for more flexibility in considering other land uses. The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any	Wild and Scenic Rivers

Commentor	Affiliation	Comment	Comment Summary Response	Category
			combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable for such designation.	
Richard Ingebretsen michael@glencanyon.org	Glen Canyon Institute	Lengthen the official comment period beyond the current 90 days, which has not allowed adequate time for the public to review and comment on the DRMP/DEIS. The comment period should be extended at least 60 days.	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held six open houses around the State to facilitate review of the Richfield DRMP/DEIS.	Process and Procedures
Richard Ingebretsen michael@glencanyon.org	Glen Canyon Institute	Any designated routes that dead-end at or near the boundary of Glen Canyon National Recreation Area should be physically and effectively blocked and signed, and those closures enforced. Examples include the Harris Wash/Silver Falls route and spurs along the Hole-in-the-Rock route.	This is beyond the scope of the RMP EIS for the RFO. Physical barriers and enforcement of closures on Glen Canyon National Recreation Area is under the NRA's jurisdiction.	Travel Management – OHV Route Identification
Richard Ingebretsen michael@glencanyon.org	Glen Canyon Institute	Wilderness Study Areas, proposed wilderness areas, and other natural lands should not be decreased and opened to ORV use. Before expanding areas for ORV use, the existing open areas need to be managed and controlled.	A range of alternatives considered a number of options for the inventoried ways in WSAs. The Little Rockies National Natural Landmark is closed to OHV use under all alternatives. BLM manages OHV use according to BLM policy, regulation, and executive order.	Wilderness Study Areas
Richard Ingebretsen michael@glencanyon.org	Glen Canyon Institute	Establish a moratorium on any new activities on the 682,000 acres of lands adjacent to Wilderness Study Areas until adequate studies can be completed to determine the ecological importance of these lands to the ecological integrity of the WSAs.	The areas adjacent to WSAs are managed according to BLM's multiple-use mandate.	Wilderness Study Areas
Robert and Arlene Glover		Tract 19 (T.30 S., R. 5 E., Sec. 3 E1/2SE1/4SE1/4) 20 acres Tract 20 (T.30 S., R. 5 E., Sec. 11., W1/2W1/2-less mineral patent 43-77-0006) +/-160 acres Concerning Tract 19 1. It is my understanding that the Federally listed threatened plant species, Last Chance Townsendia, ToWnsedia aprica has been identified on this parcel. That should preclude the listing of this property for sale. The BLM should continue to implement conservation measures to reduce adverse impacts to this plant.	Conservation strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: "Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
			documented clearances would be obtained prior to any land disposal action" This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	
Robert and Arlene Glover		Tract 19 (T.30 S., R. 5 E., Sec. 3 E1/2SE1/4SE1/4) 20 acres Tract 20 (T.30 S., R. 5 E., Sec. 11., W1/2W1/2-less mineral patent 43-77-0006) +/-160 acres Concerning Tract 20 1. This property includes Carcass Creek, one of just a couple of perennial streams in this very arid area providing important riparian habitat for resident wildlife populations. It is considered critical Mule Deer and Elk habitat by the Utah Division of Wild Life Resources as it provides food, water and seclusion for the deer and elk that forage in the adjacent agricultural land in large numbers year round. This property provides a corridor from National Forest land to the private agricultural lands for foraging. Additionally it provides vital habitat for a large flock of wild turkey for breeding, nesting and brood-rearing on a year round basis. Large herds and flocks spend the winter on this property. It would be a significant loss to the wildlife, nature observers and the local hunters if this valuable property were not maintained in its natural state by the BLM. Carcass Creek is also important in that it provides water for livestock and down stream irrigation. Although not a perennial stream Rock Creek also flows through the SUbject land. 2. If this property were sold and numerous homes built, the availability of domestic water could be put at risk and would be a critical issue. Several current homeowners in the area have had problems in the past with decreased capacity and complete drying up of water in their wells necessitating re-drilling. Several of the existing wells have significantly diminished capacity and static levels during periods of draught. 3. There is plenty of private property in this area for sale so that it does not seem necessary for BLM to put this property up for sale. Grover is unincorporated and does not have the infrastructure to deal with a significant increase in homeowners. This land should remain as a public land to be utilized by all, human and wildlife alike. 4. Scenic Byway 12, also designated as an All American Highway requires preservation of the view shed from the highway. The subject lands are within the view shed of Highway 12. There are many scenic byways but very few have been designated as All American Highways. The Draft RMP has not addressed the impact of view shed preservation under the scenic byway designation. Another reason this land should remain under the supervision of the BLM.	The method used to identify the parcels considered for disposal (Appendix 5) included: FLPMA Section 203 sales criteria, land tenure adjustment criteria (identified in Appendix 5), a BLM inter-disciplinary team review of land status ownership maps, historical index, the LR 2000 database, and resource information. BLM maintains that these tracts meet the disposal criteria based on this review. The Forest Service has not expressed interest in these parcels to date. Local, county, state, or federal governments may apply for any of the parcels identified in the tables for FLPMA Section 203 sale or other public land under other current authorities for public purposes. Preference is generally given to applicants that would provide a public benefit. Prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: "Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action" This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal. BLM disposal action doesn't mean conflicting development would occur. Future use of the land would need to meet existing planning and zoning restrictions.	Lands and Realty
Robert Barclay JenBarc@gmail .com		At Big Rocks, located south of Loa in Wayne County, there are many prehistoric archaeological sites. At that location I have seen Rock Art, hearths, lithic scatter, ceramic scatter, as well as many obvious habitation sites. Yet both alternative A and B of the DRMP would permit	The Big Rocks area has been inventoried for cultural resources. The cultural sites in the Big Rocks area have lost their integrity and no longer hold any National Register significance. The sites have been heavily vandalized and there is no legal reason to preserve the sites.	Transportation

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		unlimited OHV use at the Big Rocks area. If OHV use is allowed at the Big Rocks area, the archaeological sites will be adversely impacted, especially because it would be the only area in the county where open OHV use would be permitted. This would concentrate all OHV use to Big Rocks.		
Robert Burwell bob_burwell@yahoo.com		Historic trails are part of the american culture and should be preserved. Old Spanish National Historic Trail.	BLM is required to develop a management plan under the National Trails System Act of 1968 for Old Spanish Trail. It is currently under development. The RMP would be consistent with this plan. The Final RMP and EIS will be revised to incorporate mangement prescriptions for Old Spanish Trail.	National Trails & Backways
Robert Emrich		I feel that the BLM is not giving priority to the public requests for ACEC designation, but is instead bowing to the Wayne County Commissioner's unrealistic requests. The BLM should include all existing and public nominated ACEC's in the preferred alternative.	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection ACEC. The BLM gave full consideration to the designation and preservation ACEC during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period. A total of 27 ACEC nominations were received and the relevance and importance of each were determined. Two of the ACEC nominations were found to meet both the criteria of relevance and importance and all these were included for special management as proposed ACECs in Proposed RMP. The BLM Manual 1613.23 states that “After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM’s proposals for designation and management of ACECs.” The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager	Areas of Critical Environmental Concern

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			decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.	
Robert Emrich		Several parcels in Western Wayne County should be removed from the disposal list for the following reasons. â€¢ WN-12 and WN-12-C. These parcels contain a natural wetland with typical wetland dependent plant and animal species. On page 2-12 and Table 2-4, the document shows that the desired outcomes and goals and objectives for water resources. Land disposal is not one that was mentioned. Furthermore, an active bald eagle nest occurs within one mile or less of this wetland. It is one ofabout ten nesting pair that occurs in the entire state ofUtah. It is more than likely that the wetland is important foraging habitat for the nesting pair and their off-spring. Disposing of this parcel could have an adverse impact on this threatened species. â€¢ WN-14 A, B, C, D, E through WN-15 A, B. These parcels have known populations of Townsendia.aprica, a federally listed species under the Endangered Species Act. â€¢ WN-19 and WN-20. WN-20 is mislabeled WN-21 on map 2-24, which makes it difficult for the public to comment accurately. See map comments above. Both of these parcels also have known populations ofTownsendia aprica, a federally listed species. The disposal ofparcels WN-14, WN-15, WN-19 and WN-20 would not be consistent .with the Conservation Strategy that was put together for the Central Utah Navajo Endemics, in which the Richfield BLM office was a signing party, nor would the BLM be able to provide long-term protection of this threatened plant if lands were to be disposed (page A-14-11 #10). WN-20 also has a lentic riparian area as defined on page 3-15 ofthe document. Carcass Creek identified on page 3-7, Table 3-1, runs for about .25-.50 mile through this area. It is an important wildlife corridor connecting BLM to National Forest, which provides crucial mule deer habitat (map 3-6), and winter turkey foraging and roosting habitat. Although not listed in your document, WN-20 is also heavily used by wintering elk. See page 2-16, Table 2-5 (Retain Riparian Areas in Public Ownership) and 2-14 (Desired' Outcomes), and manage all	BLM will conduct site-specific NEPA analysis that will consider suitability of specific parcels for disposal. The Conservation Strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		riparianareas for Properly Functioning Condition. I find it difficult to understand how disposal ofthe above mentioned parcels could be for the public good.		
Robert Emrich		• There are several other parcels in Wayne and Garfield County, WN-17, GA-OI, GA-02 and GA-03 that instead of disposal, why not work with Capitol Reef National Park for possible trade or management by the National Park Service.	BLM identified these isolated parcels for disposal, which would be available for disposal, sale, or exchange to any interested party, including the NPS.	Lands and Realty
Robert Emrich		No where in the document could I find a formula or explanation of how individual parcels for disposal were identified. It seems to me the above mentioned parcels all contain important reasons for being retained by the BLM, except all these reasons were ignored. This leads me to believe no real formula was used, just some random selection ofisolated parcels without regard to the real context ofeach piece. If all the disposal lands throughout this district are so poorly inventoried, then I suggest this whole process start over with a more systematic approach to the selection of disposal parcels.	In Table 2-18 of the Draft RMP-EIS, the last bullet of the desired outcomes identifies the initial criteria used to identify the parcels for sale. This bullet has been modified in the Final EIS to further clarify BLM's process. The land tenure adjustment critieria in the lands and realty common to all management decisions has been revised to include the following: "Is not suitable for management by another federal department or agency." A detailed explanation of BLM's process beyond these changes is not required by FLPMA or NEPA in an RMP. Additional site-specific inventories would be completed in the NEPA analysis and decision-making process.	Lands and Realty
Robert Emrich		• WN-14 A, B, C, D, E through WN-15 A, B. These parcels have known populations of Townsendia aprica, a federally listed species under the Endangered Species Act. • WN-19 and WN-20. WN-20 is mislabeled WN-21 on map 2-24, which makes it difficult for the public to comment accurately. See map comments above. Both of these parcels also have known populations ofTownsendia aprica, a federally listed species. The disposal ofparcels WN-14, WN-15, WN-19 and WN-20 would not be consistent with the Conservation Strategy that was put together for the Central Utah Navajo Endemics, in which the Richfield BLM office was a signing party, nor would the BLM be able to provide long-term protection of this threatened plant if lands were to be disposed (page A-14-11 #10). WN-20 also has a lentic riparian area as defined on page 3-15 of the document. Carcass Creek identified on page 3-7, Table 3-1, runs for about .25-.50 mile through this area. It is an important wildlife corridor connecting BLM to National Forest, which provides crucial mule deer habitat (map 3-6), and winter turkey foraging and roosting habitat. Although not listed in your document, WN-20 is also heavily used by wintering elk. See page 2-16, Table 2-5 (Retain Riparian Areas in Public Ownership) and 2-14 (Desired' Outcomes), and manage all riparian areas for Properly Functioning Condition. I find it difficult to understand how disposal of the above mentioned parcels could be for the public good.	Conservation strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty
Robert Emrich		Many mistakes were observed in the map section. • Highway 24 is shown going down Capitol Gorge. It has followed the Fremont River Gorge since the early 1960's (map 2-24). • Highway 72, from Fremont to 1-70 is shown as a dirt road. It has been paved for ten or more years (map 2-24).	Routes and disposals in map 2-24 have been corrected. For maps 2-17 through 2-20, route designations are only shown on lands under BLM jurisdiction. Ownership boundaries have been added to maps 2-17 through 2-20	Maps

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Robert Emrich		Many mistakes were observed in the map section. • Disposals are mislabeled, WN-21 should read WN-20 on (map 2-24).	Routes and disposals in map 2-24 have been corrected. For maps 2-17 through 2-20, route designations are only shown on lands under BLM jurisdiction. Ownership boundaries have been added to maps 2-17 through 2-20	Maps
Robert Emrich		Many mistakes were observed in the map section. • Route designation maps 2-17 through 2-20 show no clear boundaries between land ownerships (State, US Forest Service and US Park Service). Routes seem to disappear and reappear.	Routes and disposals in map 2-24 have been corrected. For maps 2-17 through 2-20, route designations are only shown on lands under BLM jurisdiction. Ownership boundaries have been added to maps 2-17 through 2-20.	Transportation
Robert Emrich		I was informed in the same phone call to the BLM, mentioned above, that most ofthe VRI was done in the 1970's and early 1980's. I would venture to guess that a lot has changed in the past 25-30 years and would question whether the VRI is consistent with FLPMA statements "current" and "maintain on a continuing basis." The outdated lack of information makes it impossible for the public to evaluate the proposed actions comprehensively. A current VRI is therefore needed for this plan to be properly evaluated.	The Draft RMP/EIS uses the exisiting Visual Resource Inventory. The best available data was used in developing the Draft RMP/EIS.	Visual Resources
Robert Emrich jobodan@color-country.net		there is an underlying feeling that the document has been rushed and is incomplete. I read in the Salt Lake Tribune, that the BLM State Director thought that plenty of time was given to the public for reading and commenting on this plan. If the plan was complete, with accurate information for the public to make informed comments, then I would agree. But, that is not the case. Therefore, I would like to see a more accurate and comprehensive plan and one where the preferred alternative has more ACEC's and WSA's included.	The BLM started working on the RMP 7 years ago in 2001 using the best available information. The PRMP/FEIS resulted from public involvement and the gathering of the best available information. The BLM had posted a Notice of Intent (NOI) in the Federal Register to initiate the scoping phase of the planning process on November 1, 2001. Citizens and groups submitted comments from November 2001-April 2002, helping the BLM identify the issues addressed during this planning process. Based on both agency expertise, and issues raised by the public the BLM prepared a Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS) with a full description of the affected environment, a reasonable range of alternatives, and an analysis of the impacts of each alternative. The BLM posted the Notice of Availability (NOA) of the DRMP/DEIS on October 26, 2007. The public submitted comments on the DRMP/DEIS from October 2007-January 2008. Based on comments on the DRMP/DEIS and internal review, the BLM wrote the PRMP/FEIS including the Proposed Plan. The range of alternatives includes consideration of additional ACECs as well as management actions in accordance with FLPMA.	Adequacy of Analysis and Alternatives
Robert Emrich jobodan@color-country.net		ACEC DESIGNATION Throughout the plan there are many reasons given that argue the importance of Areas of Critical Environmental Concern (ACEC). However, there are only two ACEC's that are mentioned under the preferred alternative (B). Are the existing ones going to be eliminated? Alternatives C and D are the only alternatives which propose more ACEC designations. Unfortunately, Alternatives C and D are the least likely to be chosen. BLM manages land for the public and it was the public that nominated all the ACEC's listed in Alternatives C and D, not the Wayne County Commissioners (see A13-11). FLPMA states, "In the development and revision of land use plans, the Secretary shall give priority to the designation and protection of Areas of Critical Environmental Concern". I feel that the BLM is not giving priority to the	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection ACEC. The BLM gave full consideration to the designation and preservation ACEC during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period. A total of 27 ACEC nominations were received and the relevance and importance of each were determined. Two of the ACEC nominations were found to meet both the criteria of relevance and importance and all these were included for special management as proposed ACECs in Proposed RMP. The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
		public requests for ACEC designation, but is instead bowing to the Wayne County Commissioner's unrealistic requests. The BLM should include all existing and public nominated ACEC's in the preferred alternative.	management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.	
Robert Emrich jobodan@color-country.net		Several parcels in Western Wayne County should be removed from the disposal list for the following reasons. • WN-12 and WN-12-C. These parcels contain a natural wetland with typical wetland dependent plant and animal species. On page 2-12 and Table 2-4, the document shows that the desired outcomes and goals and objectives for water resources. Land disposal is not one that was mentioned. Furthermore, an active bald eagle nest occurs within one mile or less of this wetland. It is one of about ten nesting pair that occurs in the entire state of Utah. It is more	BLM will conduct site-specific NEPA analysis that will consider suitability of specific parcels for disposal. The Conservation Strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		than likely that the wetland is important foraging habitat for the nesting pair and their off-spring. Disposing of this parcel could have an adverse impact on this threatened species. WN-14 A, B, C, D, E through WN-15 A, B. These parcels have known populations of Townsendia aprica, a federally listed species under the Endangered Species Act. • WN-19 and WN-20. WN-20 is mislabeled WN-21 on map 2-24, which makes it difficult for the public to comment accurately. See map comments above. Both of these parcels also have known populations of Townsendia aprica, a federally listed species. The disposal of parcels WN-14, WN-15, WN-19 and WN-20 would not be consistent with the Conservation Strategy that was put together for the Central Utah Navajo Endemics, in which the Richfield BLM office was a signing party, nor would the BLM be able to provide long-term protection of this threatened plant if lands were to be disposed (page A-14-11 #10). WN-20 also has a lentic riparian area as defined on page 3-15 of the document. Carcass Creek identified on page 3-7, Table 3-1, runs for about .25-.50 mile through this area. It is an important wildlife corridor connecting BLM to National Forest, which provides crucial mule deer habitat (map 3-6), and winter turkey foraging and roosting habitat. Although not listed in your document, WN-20 is also heavily used by wintering elk. See page 2-16, Table 2-5 (Retain Riparian Areas in Public Ownership) and 2-14 (Desired Outcomes), and manage all riparian areas for Properly Functioning Condition. I find it difficult to understand how disposal of the above mentioned parcels could be for the public good.	parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	
Robert Emrich jobodan@color-country.net		There are several other parcels in Wayne and Garfield County, WN-17, GA-01, GA-02 and GA-03 that instead of disposal, why not work with Capitol Reef National Park for possible trade or management by the National Park Service.	BLM identified these isolated parcels for disposal, which would be available for disposal, sale, or exchange to any interested party, including the NPS.	Lands and Realty
Robert Emrich jobodan@color-country.net		Many mistakes were observed in the map section. • Highway 24 is shown going down Capitol Gorge. It has followed the Fremont River Gorge since the early 1960’s (map 2-24). • Highway 72, from Fremont to I-70 is shown as a dirt road. It has been paved for ten or more years (map 2-24). • Disposals are mislabeled, WN-21 should read WN-20 on (map 2-24). • Route designation maps 2-17 through 2-20 show no clear boundaries between land ownerships (State, US Forest Service and US Park Service). Routes seem to disappear and reappear.	Routes and disposals in map 2-24 have been corrected. For maps 2-17 through 2-20, route designations are only shown on lands under BLM jurisdiction. Ownership boundaries have been added to maps 2-17 through 2-20	Maps
Robert Emrich jobodan@color-country.net		NON WSA LANDS WITH WILDERNESS CHARACTERISTICS It was interesting to read the Desired Outcomes section in Table 2-13 and then not be able to find a single non WSA land listed for the preferred alternative or alternative C. It was only in Alternative D that 29 were found. The document appears to take an absurd all or nothing approach rather than one that provides a full range of ideas and choices in the alternatives. Because of this, it would seem to make it more difficult to	A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA. The Proposed RMP/Final EIS has been revised to include management of certain non-WSA lands with wilderness characteristics.	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
		compromise somewhere in the middle.		
Robert Emrich jobodan@color-country.net		After unsuccessfully searching for the Visual Resource Inventory (VRI), a phone call to the BLM informed me that it was not included in this Draft. It seems to me that the VRI is needed to understand how the visual resource management classes were determined and how the proposed alternatives would affect the scenic values in specific areas.	The Draft RMP/EIS uses the exisiting Visual Resource Inventory. Copies of the inventory are available in the Richfield Field Office.	Visual Resources
Robert Emrich jobodan@color-country.net		I was informed in the same phone call to the BLM, mentioned above, that most of the VRI was done in the 1970's and early 1980's. I would venture to guess that a lot has changed in the past 25-30 years and would question whether the VRI is consistent with FLPMA statements "current" and "maintain on a continuing basis." The outdated lack of information makes it impossible for the public to evaluate the proposed actions comprehensively. A current VRI is therefore needed for this plan to be properly evaluated.	The Draft RMP/EIS uses the exisiting Visual Resource Inventory. The best available data was used in developing the Draft RMP/EIS.	Visual Resources
Ronald Hix	Georgia Pacific Gypsum LLC	While Georgia Pacific fully recognizes the need to analyze energy and mineral resources in the context of the need for the protection of other resources, we believe that there are a multitude of existing regulations and checks and balances in place "for the protection of other resources" BLM has taken a snap shot look at the current conditions and is trying to project land use and management policy on things as they appear today. Georgia Pacific believes that in doing this the current draft management plan is not in harmony with multi-use and the 2000 Energy Policy and Conservation Act or the mineral leasing act and mining law.	The Draft RMP/EIS tries to estimate the reasonably foreseeable development scenario for oil and gas development (ES-8), and is in harmony with the 2000 Energy Policy and Conservatio Act and other applicable laws and regulations (Planning Criteria page 1-11 and 1-13). In analyzing the impacts to other resources and resource uses, BLM has tried to balance the need for extractive and non-extractive uses.	Minerals and Energy
Ronald Hix	Georgia Pacific Gypsum LLC	Georgia Pacific has both patented and non-patented mining claims that will be impacted by the RMP. Georgia Pacific has invested a considerable sum of both time and money in maintaining both our mining claims, as well as upgrading the processing plant that produces a final commodity for the public. Under the preferred alternative B, Georgia Pacific Gypsum's claims would be put at risk due to limited and/or no access that would essentially result in the claims being land locked and of no value.	Nothing in the RMP will invalidate prior valid existing rights. As stated on page 2-69 of the Draft RMP/EIS: "All motorized or mechanized travel would be prohibited in closed areas, with the following exceptions: – For emergency and other purposes as authorized under 43 CFR 8340.0-5(a)(2),(3),(4) and (5); – Minimum use necessary to exercise a valid existing right or authorized use."	Transportation
Ronald Parry suwa@suwa.org	SUWA	an ORV route has been designated for the Dirty Devil river. The river is not suitable for ORV travel as anyone who has walked along it will testify!	There are no designated or proposed routes in the Dirty Devil River. There is a County maintained route that crosses the Dirty Devil River near Poison Springs Canyon that would be open to motorized use. The non-motorized Angel Trail was shown on the draft RMP maps as a motorized route. That was in error and the trail has been deleted from the motorized route map.	Travel Management – OHV Route Identification
Rose Diflley		In a wilderness area, for example (map 3-14, Henry Mountains), it would be virtually impossible to conduct such science if one had to transport tools on foot, in addition to all food, water and camping gear. These comments do not even begin to address the woeful problems encountered if paleontological specimens are to be transported out on foot, most likely over rough terrain. Let's not shut down science.	Paleontological resources may be found in designated Wilderness or Wilderness Study Areas. Scientific research involving collection and removal of paleontological resources is not considered incompatible with the concept of wilderness preservation as provided for in Section 4(b) of the 1964 Wilderness Act. Additionally, paleontological resources are considered to be supplemental values, as provided for in Section 2(c) of the Act. The following provisions are recommended for addressing the management of paleontological resources in	Paleontological Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
			such areas: a. The BLM will permit on a case-by-case basis the survey and limited surface collection of fossils by qualified paleontologists, where such resources have important scientific value. Such activities must be carried out in a manner that would not degrade the wilderness character. b. The use of motorized transportation or mechanized equipment in a wilderness area is prohibited except when approved as the minimum tool necessary to accomplish the work. Such use must be approved by the State Director. c. Salvage, excavation and collection of fossils may be done only on a case-by-case basis where the project will not degrade the overall wilderness character of the area and where such activity is needed to preserve paleontological resources.	
Roxanne Runkel	USDI National Park Service	As an example, on page 4-141 it is stated that: "This alternative allows vehicles to pull off designated routes (outside WSAs) up to 50 feet of either side of the centerline for the purposes of parking/staging, and up to 150 feet of either side of the centerline for the purposes of camping. While this could result in vehicles generally impacting special status species, the area of potential impact would be less than under either Alternatives N or A." The terminology that this management action "generally" impacts the resource is not adequate to evaluate or quantify the magnitude of the impact. This example is representative of most topics which compare one alternative with other alternatives to determine the level of impact, but no alternative provides a baseline level of impact.	The baseline conditions are provided in Chapter 3 of the Proposed RMP, as discussed in Section 4.1, and all alternatives are compared to the No Action (Alternative N) as required by NEPA. The Proposed RMP has been updated to make the magnitude of the impact more apparent. As is typical in programmatic planning efforts, site-specific data are used to the extent possible but may not be entirely available. Where information was unavailable or incomplete, estimates were made regarding the number, type, and significance. Additionally, some impacts cannot be quantified given the proposed management actions. Where this gap occurs, impacts are projected in qualitative terms. In many situations, subsequent project-level analysis will provide the opportunity to collect and examine site-specific inventory data required to determine appropriate application of RMP-level guidance. In addition, ongoing inventory efforts by BLM and other agencies within the planning area continue to update and refine information that will be used to implement this RMP.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	On page 4-419, it is stated that: "By and large, the lands identified for sale include no Class A scenery, so sales of land would have no impact on the scenic relevant and important value." It is not possible to evaluate the impacts because the Visual Resource Inventory map showing Class A land is not included; and, it is not possible to quantify the term "by and large." In accordance with 40 CFR 1508.27, Chapter 4 of the draft RMP needs to be revised with information about the context, intensity, and duration of impacts added for all of the topics so that the effects of proposed management actions, including those affecting NPS managed lands, can be evaluated.	Through further review, it was determined that “The lands identified for sale include no Class A scenery”. Therefore, the term “by and large” was removed from the document (Page 4-462, line 17). By identifying that none of these areas were identified for sale, there was no reason for the by and large statement which was confusing. Hard copy maps of the VRI for the Henry Mountains are located in the Hanksville office. NEPA does not require an agency to include every piece of research supporting or opposing the analysis in an EIS. The BLM has incorporated an array of technical and scientific research, as well as the professional expertise of the BLM's ID Team members, to develop the alternatives and perform the impact analysis. This is stated in Chapter 4, 4.2.2 in the Draft RMP EIS.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	Cumulative impacts to air quality are not adequately discussed in the draft RMP. On page 4-3, it is stated that: "Impacts to air quality come primarily from sources outside the planning area, such as regional haze, or from activities on private lands within the planning area (including increased vehicle traffic on highways and roads, and industrial development such as coal-fired power plants) and are thus outside the scope of this DRMP/DEIS." While resource impacts that originate outside of the planning area, such as regional haze and other air quality	Emissions calculations have been included in the PRMP/FEIS. In response to concerns regarding air quality the following has been add to Chapter 2 of the Proposed RMP: - BLM will continue to work cooperatively with state, federal, and tribal entities in developing air quality assessment protocols to address cumulative impacts and regional air quality issues. - BLM will continue to work cooperatively with the Utah Airshed Group to manage emissions from wildland and prescribed fire activities. - National Ambient Air Quality Standards are enforced by the Utah Department of Environmental Quality, Division of Air Quality	Adequacy of Analysis and Alternatives

Commentor	Affiliation	Comment	Comment Summary Response	Category
		impacts may be beyond the management scope of the Field Office, they must still be considered in the draft RMP in order to properly quantify cumulative effects that will result from the implementation of each alternative considered.	(UDEQ-DAQ), with EPA oversight. Special requirements to reduce potential air quality impacts will be considered on a case-by-case basis in processing land use authorizations. - BLM will utilize BMPs and site specific mitigation measures, when appropriate, based on site specific conditions, to reduce emissions and enhance air quality. Examples of these types of measures can be found in the Four Corners Air Quality Task Force Report of Mitigation Options, November 1, 2007. - Project specific analyses will consider use of quantitative air quality analysis methods (i.e. modeling), when appropriate as determined by BLM, in consultation with state, federal, and tribal entities.	
Roxanne Runkel	USDI National Park Service	The topic of light impacts to the dark night sky resources found in all National Park Service areas that are adjacent to the area managed by the Richfield Field Office (RFO) needs to be addressed in the RMP.	The topic of light impacts was not raised during scoping. Furthermore, neither the BLM LUP Handbook or NEPA specifically require an analysis of light impacts. However, the recreation impacts analysis in Chapter 4 of the Draft RMP/EIS (page 4-287) includes an impact analysis on light pollution associated with minerals related exploration, development, and access road and infrastructure construction. Specific mitigation measures to address night sky and light pollution concerns may be addressed in site-specific NEPA analysis for new activities.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	In the absence of a route inventory and route designations available for review in this draft, an additional opportunity for review and comment must be provided prior to the approval of a Record of Decision for this plan. Without this information, the impacts of the route inventory and route designation to NPS lands and other resources cannot be evaluated. In addition, without this information available, there is no opportunity to coordinate the existing travel management plans of NPS units with the proposals in the draft RMP. The impacts to visitor experience within NPS units cannot be determined. To add this information after the public comment period, as stated in the Executive Summary, is contrary to CEQ Regulation Sec: 1500.1 (b) which states that: "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken." To meet CEQ Regulation, the route inventory must be finalized, the designation process must be completed for each alternative, it must be incorporated into a revised draft RMP, and it must be released to the public and the agencies for review and comment.	There was a map provided for Alternative N, Map 3-10, Route Inventory. The additional road referred to in the comment is south of Pleasant Creek. A ROW application was received, an EA written and a ROW granted for this access road across BLM land to private property. The best available route information was used as a starting point for identifying routes/trails. The route inventory process consisted of applying criteria to the route inventory and involved an interdisciplinary team including BLM, Counties, USFS, State Agencies and other Federal agencies. In addition, to the route inventory, routes identified during the public scoping and public comment period were integrated into the baseline route inventory and have been considered in preparing the Proposed RMP/Final EIS. The route inventory maps were included in the Draft RMP EIS, available on the RFO website, available on CD, and available at the public comment meetings.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	The maps pertaining to route designation provided in the draft RMP are not adequate to evaluate the impacts to resources. No map of route designation is included in the draft RMP for Alternative N that identifies the existing situation. The maps for the other alternatives indicate a variety of route designation prescriptions, however, there is not any supporting documentation that indicates how these designations were determined. On page 2-71, the draft RMP states as a management action that the BLM will: "Coordinate OHV route designations with US. Forest Service, National Park Service, State of Utah, counties and communities, where possible." No coordination took place between the	There was a map provided for Alternative N, Map 3-10, Route Inventory. The additional road referred to in the comment is south of Pleasant Creek. A ROW application was received, an EA written and a ROW granted for this access road across BLM land to private property. As IM 2004-061 notes, plan maintenance can be accomplished through additional analysis and land use planning (e.g., activity level planning). BLM will collaborate with affected and interested parties in evaluating the designated road and trail network for suitability for active OHV management and envisioning potential changes in the existing system or adding new trails that would help meet current and future demands. Table 2-17 page 2-72 and 2-73 states that route designations are implementation decisions that are	Adequacy of Analysis and Alternatives

Commentor	Affiliation	Comment	Comment Summary Response	Category
		BLM and the NPS, regarding OHV route designations, many of which are likely to impact NPS lands. Only following coordinated analysis of routes, can management recommendations for types of vehicles and restrictions of use be made and explained to the public. In the absence of analysis and coordination, OHV route designation impacts cannot be adequately evaluated.	subject to change based upon future site specific environmental analysis.	
Roxanne Runkel	USDI National Park Service	On page 2-74, motor vehicle access for parking/staging and for camping is allowed out to 50 ft. and 150 ft, respectively, from the centerline of the road. This would cause negative impacts to federally listed species and is contrary to the Best Management Practices identified to protect these species in Appendix 14 of the draft RMP. Many of the federally listed species that will be impacted by this activity on BLM land also occur on neighboring NPS lands. Adverse impacts to these listed species on BLM lands could affect the significance of populations on other federal lands and create the need for additional management actions by those agencies to protect the species. Significant inventory information on the presence of these species exists. Therefore, the RFO must do the analysis necessary to identify road segments where such access needs to be restricted to avoid impacts to listed species. Inventory information also exists regarding riparian areas, lands with wilderness characteristics, national park, state, and private lands, mineral leases, SRMAs, and lands with scenic values that lie within 50 or 150 ft of roads. Analysis and management prescriptions for off road parking and camping should evaluate impacts to listed species and other sensitive resources on BLM lands and areas of non-BLM lands should be removed from the analysis.	Allowances for parking and staging were developed for public safety. For clarification, the Preferred Alternative states, "Allow motor vehicles to use existing spur routes for ingress and egress to established campsites within 150 feet of designated routes. (Previous campsites can be distinguished by evidence of rock fire rings, old tent sites, and tracks from earlier vehicle access.) " Dispersed camping has been allowed throughout the RFO (outside of WSAs) as part of Alternative N. Alternative B proposes no new dispersed camping from the existing environment and restricting the potential area of impacts to special status species. No decisions have been made, site specific evaluations would occur during implementation.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	Similarly, the very foundation upon which decisions have been made regarding other resource topics (i.e. minerals, recreation, etc.) fails, as well, because of their reliance on the VRM. The circular reasoning that results invalidates the conclusions drawn in the draft RMP. Uses are permitted in an area designated as VRM class N because, while the use may cause significant negative impacts to visual resources, VRM class N allows negative impacts to occur, therefore the impacts are deemed insignificant. No where in the document is the original designation of a VRM class IV area analyzed against an up to date inventory of what is high value scenic quality or low value scenic quality.	The BLM used existing information of the VRM from the MFPs for the baseline. The information is available in the RFO. The evaluations were analyzed in the MFP development in the 1980s. The Visual Resource Inventory is availble for review in the Richfield Field Office.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	This suggests that portions of the most recent VRI were developed no later than 1977, the date of the earliest land use plan that incorporates the VRI.	Your comment is accurate, no new inventory was done for the VRI.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	Under the preferred alternative, management concerns related to resources on adjacent park lands were not considered in developing the management prescriptions for minerals management. As an example, BLM lands that may only be accessible across recommended	The cumulative impact Section 4.7 of the DRMP/DEIS considers the impacts to adjacent park resources. The BLM has met with the NPS is coordinating the development of the Proposed RMP, further coordination will occur at the implementation level.	Adequacy of Analysis and Alternatives

Commentor	Affiliation	Comment	Comment Summary Response	Category
		wilderness on park lands are shown as open to leasing subject only to standard leasing conditions. Coordination with the NPS should be conducted prior to determining prescriptions for minerals management on BLM lands adjacent to the park.		
Roxanne Runkel	USDI National Park Service	In contrast, the proposed management action is to eliminate three existing ACECs and dismiss 11 areas identified as possessing value worthy of an ACEC. Many of these potential ACECs contain species of special concern with management responsibility shared with NPS or are within the parks' viewshed. Descriptions of the potential ACECs and analysis of their resource values are not included in the document. On page 3-93, it is stated that the evaluations for all the nominated ACECs are in Appendix 1. That information is not present in the Appendix. On page A1-5, it states that this same information is in Attachment 3, but there is no such attachment to the draft RMP. Therefore, no rationale is presented concerning the BLM decision related to ACECs and, as with non-WSA lands with wilderness characteristics, this action appears to be arbitrary. This information should be provided in a revised draft RMP.	On page 3-93 the descriptions of the evaluations are listed, and all of the evaluations are in the Administrative Record which can be reviewed at the RFO.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	Beginning on page 4-451, there is a discussion about the Special Status Species Potential ACEC. This potential ACEC is not shown on any map nor is its location described. It is not possible to evaluate the value or impact of this special designation on other resources or proposed management actions. Because the BLM and NPS share management responsibility for many special status species, this information should be added to the document so that its potential for protecting the identified suite of rare species can be evaluated.	This ACEC is a 300 foot exclusion area of the special status species and by policy, BLM does not reveal the location of the species for its' protection. In addition, these areas are too small to effectively show on a map. The total area would be approzimately 15,100 acres, see 4-151. Section 3.5.3.2.16 describes this ACEC.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	In contrast, the proposed management action is to recommend only 2 of the 12 eligible segments for inclusion into the National Wild and Scenic River System. No reasoning is given for not including the ten eligible segments that were not included.	.The ORVs would be protected by alternative protection methods and therefore the suitability was not considered necessary for inclusion as a WSR. A range of alternatives was considered which included and analyzed all 11 eligible segments of Wild and Scenic Rivers.	Adequacy of Analysis and Alternatives
Roxanne Runkel	USDI National Park Service	Coordination with approved NPS wilderness plans and recommendations should have taken place. No rationale is presented concerning the BLM decision related to non-WSA lands with wilderness characteristics; this action, therefore, appears to be arbitrary. These deficiencies should be corrected and a revised draft RMP prepared.	The words "...to develop the RMP" were removed from the Final RMP EIS.	Consultation and Coordination
Roxanne Runkel	USDI National Park Service	The statement is made on page 1-16 that the "National Park Service ...participated as members of the interdisciplinary team to develop the RMP." While it is true that NPS personnel attended several meetings during which general information was disseminated to agencies and the public, the NPS was not invited to provide input in the development of strategies or alternatives. It would be misleading to suggest that the NPS was meaningfully involved in the development of this RMP. The words " ...to develop the RMP" should be removed from the sentence cited, above.	The words "...to develop the RMP" were removed from the Final RMP EIS.	Consultation and Coordination

Commentor	Affiliation	Comment	Comment Summary Response	Category
Roxanne Runkel	USDI National Park Service	The methodology used for determining potentially disposable lands must be presented in the RMP in order to evaluate whether impacts to a wide variety of resources were appropriately considered.	In Table 2-18 of the Draft RMP-EIS, the last bullet of the desired outcomes identifies the initial criteria used to identify the parcels for sale. This bullet has been modified in the Final EIS to further clarify BLM's process. The land tenure adjustment critieria in the lands and realty common to all management decisions has been revised to include the following: "Is not suitable for management by another federal department or agency." A detailed explanation of BLM's process beyond these changes is not required by FLPMA or NEPA in an RMP. Additional site-specific inventories would be completed in the NEPA analysis and decision-making process.	Lands and Realty
Roxanne Runkel	USDI National Park Service	Section 203 of FLPMA states that public land may have the potential for disposal if "its location or other characteristics is difficult and uneconomic to manage as part of the public lands, and is not suitable for management by another Federal department." [italics added] Map 2-24 identifies four parcels of Public land adjacent to Capitol Reef National Park's eastern boundary (WN17, near Notom, and GAO1, GA02, and GA03 near the Sandy Ranch). Capitol Reef's General Management Plan describes three areas, the Fremont River gorge, land between the park and Notom Road (including these four parcels), and Glass Mountain, where potential land exchanges would assist the park in protecting and managing resources.	BLM identified these isolated parcels for disposal, which would be available for disposal, sale, or exchange to any interested party, including the NPS.	Lands and Realty
Roxanne Runkel	USDI National Park Service	Maps 2-6 and 2-7 representing all alternatives show the Horseshoe Canyon unit of Canyonlands National Park as "allotment with forage allocated to livestock." This is incorrect. Livestock grazing was phased out in this part of Canyonlands in the 1980s, or earlier. In addition, grazing is shown in the Cathedral Valley, Rock Springs Bench, and Jones Bench areas of Capitol Reef National Park; but grazing has also been retired from those areas.	The commentor is correct that these portions of allotments have no forage allocated to livestock. These maps have been modified to reflect this. The display of Robbers Roost Allotment on Maps 2-6 and 2-7 is an error, and has nothing to do with the Canyonlands HMA.	Livestock Grazing
Roxanne Runkel	USDI National Park Service	For the Bullfrog Allotment, it is not apparent why active AUMs are being increased from any other previous planning effort. We ask for an explanation as to why this authorization has increased by 63 AUMs. Also, please indicate why the allotment was made an "Improvement" allotment from "Maintenance".	The Draft RMP/EIS Appendix 7 was generated using information from the Henry Mountains Grazing EIS. However, the subsequent Rangeland Program Summary addressed allocation by allotment, but did not adopt one alternative for all the allotments. Appendix 7 has been modified to reflect the allocations made in the RPS. Additionally, management categories (M, I, C) are not a land use plan decision, and are therefore outside the scope of this NEPA document. This issue is a coordination issue that is best resolved outside this NEPA process.	Livestock Grazing
Roxanne Runkel	USDI National Park Service	For the Robbers Roost Allotment, we surmise that the AUM differences in Table 1 reflect the partial relinquishment of grazing use, closure of park lands, and reallocation to wildlife and wild burros. However, it is not known why Maps 2-6 and 2-7 show that Glen Canyon NRA portions of this allotment are open when Chapter 5 describes these lands as closed. Does it relate to wild burro use of Glen Canyon NRA lands just to the northeast of the Canyonlands Herd Management Area? If so, burro use of park lands needs to be explained in the plan where appropriate.	The livestock grazing allotment tables in Appendix 7 have been revised. Grazing has been removed from a portion of Robbers Roost Allotment while grazing continues on the other portion, however this change has not been reflected in the maps. The GIS shapefiles have not been revised to break-out the new boundary for this change. 322 previous sheep AUMs were converted to 63 cattle AUMs. While the number of cattle AUMs have increased, the total number of AUMs has decreased due to the conversion factor between cattle and sheep AUMs. The change in AUMs is unrelated to burro use.	Livestock Grazing

Commentor	Affiliation	Comment	Comment Summary Response	Category
Roxanne Runkel	USDI National Park Service	For the Rockies Allotment, it seems that active AUMs have been increased from 5,600 to 5,872. We believe this may be due to incorporating exchange AUMs established for the allotment. For our records and to update our Grazing Management Plan, can you please explain this discrepancy?	The Draft RMP/EIS Appendix 7 was generated using information from the Henry Mountains Grazing EIS. However, the subsequent Rangeland Program Summary addressed allocation by allotment, but did not adopt one alternative for all the allotments. Appendix 7 has been modified to reflect the allocations made in the RPS.	Livestock Grazing
Roxanne Runkel	USDI National Park Service	For the Sewing Machine Allotment, wildlife AUMs are being increased. With drought and current forage conditions, are additional AUMs available? How can this be done without increasing total AUMs available? Also, please indicate why the allotment was recently made an "Improvement" allotment from "Custodial".	The Draft RMP/EIS Appendix 7 was generated using information from the Henry Mountains Grazing EIS. However, the subsequent Rangeland Program Summary addressed allocation by allotment, but did not adopt one alternative for all the allotments. Appendix 7 has been modified to reflect the allocations made in the RPS. Additionally, defining management categories (M, I, C) are not a land use plan decision, and are therefore outside the scope of this RMP document. This issue is a coordination issue that is best resolved outside this RMP process.	Livestock Grazing
Roxanne Runkel	USDI National Park Service	For the Waterpocket Allotment, we are unsure as to what management category this allotment falls under. Please notify us which category it is in for our records.	Management categories (M, I, C) are not a land use plan decision, and are therefore outside the scope of this NEPA document. This issue is a coordination issue that are best resolved outside this NEPA process.	Livestock Grazing
Roxanne Runkel	USDI National Park Service	Map 3-12 and several maps depicting coal unsuitability, inaccurately shows Capitol Reef NP lands as possessing coal resources with development potential. Park lands are closed to mining. The maps should be revised, accordingly.	Map 3-12 has been revised to show correct ownership.	Maps
Roxanne Runkel	USDI National Park Service	For minerals, the Glen Canyon NRA Minerals Management Plan (1980) should be added to the list of "Other Related (National Park Service) Plans" and its contents incorporated throughout the draft RMP, as necessary. For example, as described in the Minerals Management Plan, Glen Canyon NRA lands to be considered in the plan are both closed and open to mineral disposition. There are two primary mineral resources of consideration in the planning area: oil and uranium/vanadium. Oil deposits are found mostly in the area known as the Tar Sands Triangle (45% of the triangle is located in Glen Canyon NRA) and uranium/vanadium deposits are scattered throughout the area of consideration. These considerations should be included in the draft RMP.	The Proposed RMP/Final EIS has been revised to include the Glen Canyon Minerals Management Plan (1980) to the list of other related plans. The Glen Canyon National Recreation Area General Management Plan was considered in the Draft RMP/EIS. Leasing would be in conformance with the NRA General Management and Mineral Plans. Similarly, BLM is not making recommendations as to which lands in the NRA are open to entry under the mining laws.	Minerals and Energy
Roxanne Runkel	USDI National Park Service	However, stipulations to minimize and mitigate the impacts to light and sound on NPS lands are only considered under Alternatives C and D, and we are unable to determine what rationale was used to determine that these stipulations were appropriate only for inclusion in these two alternatives and not for others, including Alternative B, the Preferred Alternative. Further, it is not possible to determine which lands adjacent to Capitol Reef National Park would potentially be subject to controlled surface use rather than no surface occupancy. Because the analysis of impacts to resources is not adequately addressed in the document, it is difficult to determine which alternative would be most effective in minimizing and mitigating impacts to NPS lands. But in the case of oil and gas lease stipulations, it appears that Alternatives C and D would be	The Draft RMP/EIS analyzed a range of alternatives to evaluate the impacts and select the preferred alternative.	Minerals and Energy - Oil and Gas

Commentor	Affiliation	Comment	Comment Summary Response	Category
		most effective it protecting light and sound resources found on NPS lands. Therefore, we recommend that the BLM incorporate those oil and gas lease stipulations for lands adjacent to NPS lands found in Alternatives C and D into the preferred alternative. If the BLM determines that affording this level of protection to NPS lands is not appropriate, then it must identify that rationale and present that information in a revised draft RMP.		
Roxanne Runkel	USDI National Park Service	We suggest that inclusion of the Agreement's (2006 Central Utah Navajo Sandstone Endemics Conservation Agreement) management strategies is appropriate for the RMP and further recommend that the BLM consult with the Agreement signatories to determine if the land is suitable for disposal prior to publication of the final EIS. For both the lands near Grover discussed above and those near the Capitol Reef National Park boundary discussed previously, it is unnecessary to rely on future NEPA processes when existing information could be presented to the public now with regard to the potential for disposing of these lands. It is inappropriate to identify these lands as having potential for disposal when it is known that they have resources present that would likely preclude that action.	The Central Utah Navajo Sandstone Endemics Conservation Agreement would be addressed by the decision in the Draft RMP/EIS Chapter 2, page 2-24, which states, "Implement the goals and objectives of recovery plans, conservation agreements and strategies..." There is no need to list all such documents in the RMP in order to implement these documents. However, the BLM has updated the list of documents in the Final RMP EIS to include the 2006 Central Utah Navajo Sandstone Endemics Conservation Agreement. The BLM is in compliance with the Conservation Agreement and has modified maps and tables accordingly.	Process and Procedures
Roxanne Runkel	USDI National Park Service	On page 3-112, the draft RMP incorrectly states that visitation at Capitol Reef declined 23% from 1999 to 2002. The actual decline during that time period is 18.8 % according to NPS statistics and the erroneous number should be corrected. To present a more up to date discussion on this topic, data is available for additional years and the actual decrease through 2007 for the park is 16.5%. Data from 1999 to 2002 for Canyonlands National Park is also erroneous and should be 17.1% while the most recent data to 2007 shows a decline of 10.1%. The correct data for Glen Canyon National Recreation Area from 1999 to 2002 should be 18.8% and most recent data shows a continued decline to 25.9%.	This will be reflected in the Final RMP EIS.	Process and Procedures
Roxanne Runkel	USDI National Park Service	Capitol Reef National Park is incorrectly identified as a Monument on maps 2-24,2-25, and several other maps in the appendices and the indicated boundaries are also inaccurate. On those maps, State Highway 24 is incorrectly shown as passing south of Fruita through Capitol Gorge despite the fact that the highway has passed east of Fruita along the Fremont River since 1962. Private lands are incorrectly shown within Capitol Reef National Park. On many maps, NPS lands are not shown at all, making it difficult to differentiate between different land owners or to evaluate impacts along our boundaries. These mapping deficiencies need to be corrected.	The maps have been revised for the Fnal RMP EIS. Previously, the Richfield Field Office had defered to the US Geological Society to provide topographical maps.	Process and Procedures
Roxanne Runkel	USDI National Park Service	The Visual Resource Inventory (VRI) is not provided in the draft RMP; thereby precluding the ability to evaluate the impacts of proposed management actions to scenic quality.	The Draft RMP/EIS uses the exisiting Visual Resource Inventory. Copies of the inventory are available in the Richfield Field Office.	Visual Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
Roxanne Runkel	USDI National Park Service	Throughout the document, VRM is inappropriately used as the yardstick for measuring impacts to visual resources. In fact, VRM is a management action that should have been developed from the VRI and should have its own evaluation to determine how it will impact scenic resources. If, for example, VRM class N is overlain on VRI scenic quality A (high value), it will have a greater impact on scenic values than if it overlays VRI scenic quality C (low value).	VRM is the BLM's management tool for scenic resources. The VRM classes are developed from the VRI, with consideration from other resource activities.	Visual Resources
Roxanne Runkel	USDI National Park Service	On page A2-9, Maidenwater Creek was described as follows: "Maidenwater was one of few creek's that the ID team unanimously supported as outstandingly remarkable," [italics added] yet it appears that it was not recommended for inclusion because, as stated on the same page, "Garfield County disagreed with the preliminary eligibility finding." This section of the draft RMP needs to be rewritten with a discussion of why eligible stream segments were not recommended for inclusion based on appropriate criteria.	The Draft RMP/EIS Appendix 2 was revised to clarify rationale for eligibiltiy of Maidenwater Creek. Maidenwater Creek was not found to be suitable due to the highway corridor ROW and conflicts with ownership (see Appendix 3).	Wild and Scenic Rivers
Roxanne Runkel	USDI National Park Service	The National Park Service has identified the section of Horseshoe Canyon within Canyonlands National Park as eligible for the Wild and Scenic Rivers system. Since ephemeral stream flows do not preclude eligibility, it appears that Horseshoe Canyon on adjacent BLM lands is also eligible. Several other streams were identified in Appendix 2 as ineligible because of ephemeral flows and those should also be re-evaluated.	The Draft RMP/EIS Appendix 2 provides information regarding the rationale for eligibility of Horseshoe Canyon. The determination is consistent with IM-2004-196 in regards to eligibility of ephemeral streams.	Wild and Scenic Rivers
Roxanne Runkel	USDI National Park Service	Large portions of existing WSAs are proposed for OHV use on designated routes and trails, contrary to law.	IMP allows for continued OHV use on inventoried ways in WSAs during the WSA phase. The travel management plan in the RMP designates which inventoried ways will be available for motorized use.	Wilderness Study Areas
Scott Braden	SUWA	In addition, regarding the content of an environmental analysis, “The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.” 40 C.F.R. § 1500.1(b). This type of analysis is wholly lacking with regard to travel planning, as well as many other aspects of the Richfield DRMP/EIS.	A systematic interdisciplinary approach was used to provide accurate, objective and scientifically sound environmental analysis on the environmental consequences associated with the management actions or prescriptions under each alternative. The analysis discloses the direct, indirect and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives.	Adequacy of Analysis and Alternatives
Scott Braden	SUWA	The DRMP/EIS generally provides little or no discussion of cumulative impacts or the effects connected activities have on various resources. A summary of these requirements, with citations to the NEPA regulations and statute, is provided above. Its failure to account to those synergistic and additive impacts violates NEPA.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7. Further, air quality emission calculations have been completed for the PRMP/FEIS.	Adequacy of Analysis and Alternatives

Commentor	Affiliation	Comment	Comment Summary Response	Category
Scott Braden	SUWA	We have noted elsewhere that the EIS has not discussed the cumulative effects of various uses like ORV recreation and grazing on, for example, riparian areas. These cumulative effects should also be considered in the context of climate change and how these uses act synergistically to impact the resources of the Richfield Field Office.	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.	Adequacy of Analysis and Alternatives
Scott Braden	SUWA	The DRMP/EIS Failed to Analyze the Impacts of Climate Change to the Resources of the Richfield Field Office	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.	Air Quality
Scott Braden	SUWA	A strong argument can be made that over the life of the RMP, no other factor will affect the resources of the Richfield Field Office more than climate change;	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to Chapter 4 of the PRMP/FEIS.	Air Quality
Scott Braden	SUWA	For example, given that so many of the predicted outcomes of climate change center on increased soil erosivity, dust storms, shrinking water resources, loss of riparian areas, invasion of exotic plants, and the spread of hotter, larger wildfires, it is entirely reasonable to expect the BLM to design alternatives that minimize soil disturbance as much as possible. And given that ORVs are associated with both the ignition of wildfires, increased erosion, and the spread of exotic weeds, it is likewise reasonable to expect that the BLM would design – and even designate as preferable – an alternative with far fewer than the 4,176 miles of backcountry ORV routes that the current preferred alternative	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS. The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this	Air Quality

Commentor	Affiliation	Comment	Comment Summary Response	Category
		contains.	effect was added to Chapter 4 of the PRMP/FEIS.	
Scott Braden	SUWA	A critical aspect of this section is FLPMA's "priority" requirement for ACEC designation. In short, BLM must prioritize ACEC designation in all alternatives under consideration, not simply the "conservation" alternative. BLM has not recognized this statutory mandate that the agency give preference to ACEC designation in the Richfield DRMP/EIS.	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection ACEC. The BLM gave full consideration to the designation and preservation ACEC during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period. A total of 27 ACEC nominations were received and the relevance and importance of each were determined. Two of the ACEC nominations were found to meet both the criteria of relevance and importance and all these were included for special management as proposed ACECs in Proposed RMP. The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM's proposals for designation and management of ACECs." The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use; that the public benefits of such other use outweigh the public benefits of use appropriate	Areas of Critical Environmental Concern

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			with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.	
Scott Braden	SUWA	BLM has improperly ignored or discounted the threats to special places from oil and gas development and off-road vehicle use, and thus failed to designate and/or failed to incorporate sufficient protections for proposed ACECs.	The ACEC evaluation appendix (Appendix 1) has been modified and a section added to Chapter 2 discussing threats to the relevant and important values; however, whether threats currently exist does not preclude a potential ACEC from being considered in the action alternatives. All nominated areas with relevant and important values are identified as potential ACECs and addressed in the action alternatives. Threats to relevant and important values are likely to vary by alternative. The Proposed RMP/Final EIS has been revised from the draft document to better address potential threats and impacts by alternative.	Areas of Critical Environmental Concern
Scott Braden	SUWA	2. BLM has specifically failed to designate ACECs to protect lands with wilderness characteristics.	The BLM has separate policies and guidelines as well as criteria for establishing ACECs and WSAs. The differing criteria make it possible that the same acreages will qualify as both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies. As per BLM Manual 1613, ACEC designation shall not be used as a substitute for a wilderness suitability recommendation.	Areas of Critical Environmental Concern
Scott Braden	SUWA	That the BLM proposes such a massive rollback of ACEC protections (a loss of 13,670 acres), and that BLM is proposing to not designate ACECs for 886,810 acres in 16 areas the agency found met the relevance and importance criteria suggests a craven political influence upon the process and a breathtaking violation of FLPMA. This is a fatal flaw in the plan and if uncorrected, will likely result in a court setting aside the entire plan.	All 16 potential ACECs, 886,810 acres, were considered in the range of alternatives and were available for the decisionmaker to consider in developing the Proposed RMP and ROD. Special management attention is not required to protect potential ACECs if standard or routine management prescriptions are sufficient to protect the resource or value from risks or threats of damage/ degradation, or if the area is being proposed for designation under another statutory authority. See Appendix 1 for a summary statement for each existing and potential ACEC.	Areas of Critical Environmental Concern
Scott Braden	SUWA	The Richfield RMP should include an evaluation of and prescriptions for how the plan will be consistent with the land use plans for the nearby NPS-managed lands pursuant to 43 C.F.R. § 1610.3-2. The RFO should not only declare that the plan is consistent with these other plans, but should strive to manage the lands in conjunction with the standard of conservation that these Parks use.	BLM coordinated with the National Park Service to develop the Draft RMP/EIS (see section 5.3.1). Despite the efforts to coordinate, the National Park Service and BLM have different land use mandates. BLM is required to follow the multiple-use mandate prescribed by FLPMA on BLM-administered lands.	Consultation and Coordination
Scott Braden	SUWA	Recommendation: The Richfield RMP should be consistent with the management of the NPS-managed lands in the area and should provide management objectives and prescriptions that protect and do not impair the conservation values of these lands. This should include, but is not limited to, VRM Class I designations, lower-impact and quiet recreation uses (including restrictions on ORV use), and an overall landscape-level approach to ensure long-term preservation of the outstanding values of this special area.	BLM coordinated with the National Park Service to develop the Draft RMP/EIS (see section 5.3.1). Despite the efforts to coordinate, the National Park Service and BLM have different land use mandates. BLM is required to follow the multiple-use mandate prescribed by FLPMA on BLM-administered lands.	Consultation and Coordination
Scott Braden	SUWA	5. The BLM acknowledges the high potential for cultural resource sites – and that less than 5% of lands managed by the Richfield Field Office	The potential impacts to Cultural Resources from Travel Management decisions are analyzed within Chapter 4 of the DRMP/EIS. Reducing cross-country OHV	Cultural Resources

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		have been inventoried. However, the BLM never quantifies this assertion with analysis of how close many of the proposed routes are to known sites. Also, there is no analysis of the likelihood that route designation will harm unknown sites.	use to less than 1% of the RFO and designation of existing routes reduces the potential for inadvertent impacts to cultural resources. Appendix 9 has been added in the PRMP/FEIS to provide additional information regarding the route designation process, which is an implementation level decision subject to change. Existing routes within the RFO were analyzed on a case-by-case basis with consideration of other resources and consistency with RMP decisions identified to protect those resources and values.	
Scott Braden	SUWA	BLM must fully analyze and consider the no-leasing alternative, which would provide for no more leasing in the Richfield Field Office – as opposed to simply the maintenance of the status quo of making lands available for leasing in the no-action alternative – in the EIS accompanying the Richfield RMP.	Closing the planning area to new oil and gas leasing is not a reasonable alternative. Closing the entire planning area to new mineral leasing would also eliminate the opportunity for mineral development and production at a time when national policy is encouraging such development. Not issuing new mineral leases in portions of the planning area in response to other identified resource needs is addressed in the alternatives analyzed in detail. These alternatives include various considerations for maximizing individual resource values and uses in specific areas where conflicts exist and for closing these areas to mineral leasing and related development.	Minerals and Energy - Oil and Gas
Scott Braden	SUWA	Although oil and gas development may be subject to fluctuations, the reasonably foreseeable development scenario significantly and arbitrarily exceeds the historical reality of the planning area and must be revised.	The RFD predicts a reasonable development scenario for oil and gas activity based on geological conditions, oil and gas potential, leasing activity, historic trends, and the current and projected interest.	Minerals and Energy - Oil and Gas
Scott Braden	SUWA	One shortcoming common to every alternative analyzed in the Richfield Draft RMP is that the BLM has not endeavored to match oil and gas leasing stipulations with actual known geologic reserves of oil and gas and areas of historical development.	Oil and gas leasing stipulations were based on oil and gas potential and other resource concerns. The stipulations were developed to protect resources.	Minerals and Energy - Oil and Gas
Scott Braden	SUWA	The BLM should modify alternatives A through D so that they will close additional environmentally sensitive areas to leasing – or to surface occupancy – since such closures are unlikely to limit feasible oil and gas production in the planning area. The BLM should either close to leasing or impose no surface occupancy restrictions on all proposed ACECs and all non-WSA lands with wilderness characteristics.	According to BLM policy, the least restrictive stipulations needed to protect resource values would be applied. Under Alternative D, the non-WSA lands with wilderness characteristics would be closed to oil and gas leasing.	Minerals and Energy - Oil and Gas
Scott Braden	SUWA	The BLM's reasonably foreseeable development (RFD) scenario is arbitrary and capricious and ignores historic development trends in the planning area.	The RFD predicts a reasonable development scenario for oil and gas activity based on geological conditions, oil and gas potential, leasing activity, historic trends, and the current and projected interest.	Minerals and Energy - Oil and Gas
Scott Braden	SUWA	Inexplicably, the RFD scenario then applies the historic rate of development for the entire planning area to Areas 1 and 2 combined, which comprise only a portion of the planning area. See id. There is no justification for why this fraction of the planning area is expected to see drilling rates that have only been seen historically in the combined planning area. Furthermore, the RFD scenario applies this same fractional miscalculation to Area 3, suggesting that it alone would expect to see as many wells drilled per year in the future as the entire planning area has historically averaged per year. See id. Area 4 also includes excessive, inflated figures.	The RFD predicts a reasonable development scenario for oil and gas activity based on geological conditions, oil and gas potential, leasing activity, historic trends, and the current and projected interest.	Minerals and Energy - Oil and Gas

Commentor	Affiliation	Comment	Comment Summary Response	Category
Scott Braden	SUWA	The BLM must develop a new reasonably foreseeable development scenario that is historically accurate and actually tied to productive oil and gas fields. The present method completely ignores historical trends and declining production.	The RFD predicts a reasonable development scenario for oil and gas activity based on geological conditions, oil and gas potential, leasing activity, historic trends, and the current and projected interest.	Minerals and Energy - Oil and Gas
Scott Braden	SUWA	As part of its analysis the BLM must consider a no leasing alternative – in addition to a no action alternative. The current draft of the RMP fails to consider such an alternative. Federal courts have made clear that a no leasing alternative should be a vital component in ensuring that agencies have all possible approaches before them.	Closing the planning area to new oil and gas leasing is not a reasonable alternative. Closing the entire planning area to new mineral leasing would also eliminate the opportunity for mineral development and production at a time when national policy is encouraging such development. Not issuing new mineral leases in portions of the planning area in response to other identified resource needs is addressed in the alternatives analyzed in detail. These alternatives include various considerations for maximizing individual resource values and uses in specific areas where conflicts exist and for closing these areas to mineral leasing and related development.	Minerals and Energy - Oil and Gas
Scott Braden	SUWA	Further, if BLM continues to exclude designation of new WSAs from consideration in the DRMP/EIS, it risks violating both FLPMA and NEPA, and jeopardizing the validity of the entire planning process.	See Utah v. Norton. Refer to IMs 2003-274 and 275 for guidance regarding interpretation of the Utah v. Norton wilderness lawsuit settlement. See the Land Use Planning Handbook, H-1601-1, Section II, Land Use Plan Decision. See section 201 of FLPMA.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	The Richfield RMP should provide real management protection for these BLM roadless lands, a significant non-renewable resource that is threatened by oil & gas development and ORV use.	A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	However, SUWA and others maintain that some wilderness quality lands have yet to be appropriately identified as possessing wilderness characteristics by the BLM. This is sometimes because the BLM has inventoried areas and found that the lands do not possess wilderness characteristics and SUWA and the BLM disagree over the decision. There also remain some areas that the BLM has yet to conduct an appropriate on-theground inventory, and has instead relied on aerial photos (which tend to exaggerate impacts because vegetation patterns from old impacts are far more visible from the air than on the ground), where as most of these impacts cannot be found on the ground by experienced field workers, and would certainly be unnoticeable to most visitors.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of aerial photo interpretation, ID team review, County and BLM GIS data, range files, and on-the-ground verification.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	The BLM preferred alternative designates motorized routes within areas found to possess wilderness characteristics.	A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Based on our review, SUWA contends that BLM has only performed a cursory assessment of these wilderness character units and a more complete and detailed evaluation and inventory of these units is warranted. Within the Richfield DRMP/EIS, several wilderness quality lands have yet to be appropriately identified as possessing wilderness characteristics. The Richfield Field Office has failed to identify the full extent of lands with a natural appearance and not significantly impacted by man's activity.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of aerial photo interpretation, ID team review, County and BLM GIS data, range files, staff knowledge, and on-the-ground verification. BLM stands by their determinations.	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
Scott Braden	SUWA	Further, the recent WCR arbitrarily excludes or fails to identify two wilderness quality BLM lands contiguous with the Manti-La Sal National Forest. In each case, these BLM parcels are part of a larger roadless and wilderness character landscape including FS lands, and are not physically separated by a significant impact (rather, their only separation is an administrative boundary).	As identified in the DRMP/EIS within Chapter 3, Table 3-20, starting on Page 3-59, the BLM identified if non-WSA lands with wilderness characteristic areas were adjacent to other lands administratively endorsed for wilderness. BLM stands by the determination for the Wildcat Knolls area evaluation completed in 2007.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	In addition to the above mentioned BLM lands contiguous to the Manti–La Sal National Forest Service, it appears the Richfield BLM did not assess the substantive comments SUWA provided during the RMP scoping period which detailed instances in which the Wilderness Inventory Area (WIA) did not include or identify the full extent of wilderness character and characteristics present.	BLM has inventoried the lands in 1996 to 1999, evaluated proposals received during the planning process, and has fully identified wilderness resources which exist on any information for any area inventoried or evaluated. Information received during the public scoping period was considered by the interdisciplinary review team using the best available information. BLM will not reinventory lands inventoried in 1996 to 1999 or other evaluations further at this time.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	The Richfield BLM relies on the fact that a wilderness inventory has already been performed in these areas, therefore, there was no need to address these areas again, regardless of whether the information the agency currently has may be inaccurate. Again, this flawed directive is from the Utah State BLM planning team, which is at odds with FLPMA. The BLM should fully identify the extent of the wilderness resource that exists within the field office, whether or not the agency evaluated an area prior to 1999.	BLM has inventoried the lands in 1996 to 1999, evaluated proposals received during the planning process, and has fully identified wilderness resources which exist on any information for any area inventoried or evaluated. BLM will not reinventory lands inventoried in 1996 to 1999 or other evaluations further at this time.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	An example of the above-described problem is the Mount Ellen/Blue Hills WIA, where, near Sandy Creek, BLM staff identified the wilderness character boundary along an arbitrary section line. This section line feature fails to follow or utilize a significant impact, but rather runs across natural topography.	BLM has inventoried the lands in 1996 to 1999, evaluated proposals received during the planning process, and has fully identified wilderness resources which exist on any information for any area inventoried or evaluated. BLM will not reinventory lands inventoried in 1996 to 1999 or other evaluations further at this time.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Another notable example is where the BLM does not asses the Indian Spring Benches area, which is located south of Mount Hillers.	BLM has inventoried the lands in 1996 to 1999, evaluated proposals received during the planning process, and has fully identified wilderness resources which exist on any information for any area inventoried or evaluated. BLM will not reinventory lands inventoried in 1996 to 1999 or other evaluations further at this time.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Using natural features (i.e. cliffs, contour lines, etc.) to define the extent of wilderness characteristics is inappropriate for the identification of the wilderness resource. While such natural features might be good boundaries for the management of such resources, these types of boundaries are inappropriate for the identification of wilderness resources.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of aerial photo interpretation, ID team review, County and BLM GIS data, range files, and on-the-ground verification. The BLM findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. This process was used to identify the boundary of naturalness. These findings are available in the administrative record. The BLM is satisfied that it has used a high-standard approach to public land inventory and it stands by its findings, particularly those findings involving wilderness characteristics inventory maintenance.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Comment A – BLM has yet to analyze and assess the information SUWA provided to the BLM within the Cane Spring Desert new and supplemental information in conjunction with the public lands located within Glen Canyon National Recreation Area.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
Scott Braden	SUWA	Fiddler Butte Wilderness Character Unit Comment A – BLM fails to address SUWA's previous comments which demonstrated that the BLM has yet to fully identify the wilderness character and characteristics that exist today.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Fiddler Butte Comment B – It appears that this area within the SITLA section may be BLM lands and if in fact this is the case, no wilderness character inventory has been performed recently. It is contiguous with the area already determined to have wilderness character and this area also possesses naturalness.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Freemont Gorge Wilderness Character Unit Comment A – BLM only address a few of SUWA's previous comments the clearly demonstrated that the BLM has yet to fully identify the wilderness character and characteristics that exist today.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Mount Ellen/Blue Hills Wilderness Character Unit Comment A – BLM only addresses a few of previous SUWA comments that demonstrated that the BLM has not fully identified the wilderness character and characteristics that exist today.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Mount Hillers Wilderness Character Unit Comment A – BLM only addresses a few of previous SUWA comments that demonstrated that the BLM has not fully identified the wilderness character and characteristics that exist today.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Mount Pennell Wilderness Character Unit Comment A – BLM only addresses a few of previous SUWA comments that demonstrated that the BLM has not fully identified the wilderness character and characteristics that exist today.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Muddy Creek/Crack Canyon We note though, that due to BLM's overdue motorized restrictions within the Factory Butte area, motorized use in these areas has dramatically lessened. As a result, lands that once saw heavy vehicle abuse are now experience less use. Therefore, these areas once again possess wilderness character. BLM needs to address this for its ongoing planning purposes.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Ragged Mountain Wilderness Character Unit Comment A – BLM only addresses a few of previous SUWA comments that demonstrated that the BLM has not fully identified the wilderness character and characteristics that exist today.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Wildcat Knolls Wilderness Character Unit Comment A – BLM arbitrarily drops both Unit A and Unit C of the Wildcat Knolls wilderness character for different and unjustified reasons.	BLM made a determination on the wilderness characteristics for these areas. Unit A and C were found not to possess wilderness characteristics based on review of existing information and interdisciplinary reports. As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. Existing and authorized future actions were considered. The BLM's findings are described in the 2007 wilderness characteristics review	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			process (findings from this review are available in the Administrative Record). The BLM stands by the determination for the Wildcat Knolls area.	
Scott Braden	SUWA	Comment B – This small area, part of the larger roadless and wilderness character unit, was not properly identified by the Richfield BLM as having wilderness characteristics.	The commentor submitted information on these areas. BLM made a determination on the wilderness characteristics for these areas. The determination is that these areas lack wilderness characteristics. The information was provided to the commentor and is included in the administrative record.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Comment C – BLM eliminated this entire area from possessing wilderness values arbitrarily. BLM states that the proposed coal haul road will impact the area, therefore, the agency eliminates the present wilderness resource prior to it being eliminated on the ground. This outcome is not appropriate,	BLM made a determination on the wilderness characteristics for these areas. Unit A and C were found not to possess wilderness characteristics based on review of existing information and interdisciplinary reports. As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. Existing and authorized future actions were considered. The BLM's findings are described in the 2007 wilderness characteristics review process (findings from this review are available in the Administrative Record). The BLM stands by the determination for the Wildcat Knolls area.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Besides the BLM lands within Wildcat Knolls wilderness character units that are contiguous to the roadless areas of the Manti – La Sal National Forest, the Richfield BLM manages several additional BLM wilderness character units that are contiguous to roadless Forest Service lands. In each instance here, these BLM lands are part of the larger roadless and wilderness character units, but have yet been fully accounted for their wilderness characteristics. As result, the Richfield BLM's current planning effort does not accurately address the resource of wilderness within each of these areas.	BLM concludes that the decisions reached in previous BLM inventories and evaluations remain valid. The following units, addressed in the 1996-1999 BLM Re-inventory effort, will not be considered further: Cane Springs Desert Wilderness Character Unit Fiddler Butte Wilderness Character Unit Fremont Gorge Wilderness Character Unit Mount Ellen/Blue Hills Wilderness Character Unit Mount Hillers Wilderness Character Unit Mount Pennell Wilderness Character Unit Muddy Creek/Crack Canyon Wilderness Character Unit Ragged Mountain Wilderness Character Unit Wildcat Knolls Wilderness Character Unit Additional units were submitted during the draft comment period. These units were evaluated and found not to possess wilderness characteristics: South Sevier Plateau Wilderness Character Unit North Sevier Plateau Wilderness Character Units Tushar Mountains Wilderness Character Units Aquarius Plateau Wilderness Character Units Thousand Lakes Mountain Wilderness Character Units Wasatch Plateau Wilderness Character Units Pahvant Range Wilderness Character Units The Fishlake National Forest and Dixie National Forest has made no administrative endorsements on wilderness areas or any designated wilderness areas. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have officially "designated wilderness areas" or "administratively endorsed lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Therefore, the wilderness character units less than 5,000 acres failed to meet the size requirement for wilderness characteristics. Other submissions over 5,000 acres lacked naturalness.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	See Map A, South Sevier Plateau - South of the currently identified BLM area of Pole Canyon wilderness character unit lies a large area of BLM lands not yet identified as containing wilderness characteristics.	BLM concludes that the decisions reached in previous BLM inventories and evaluations remain valid. The following units, addressed in the 1996-1999 BLM Re-inventory effort, will not be considered further: Cane Springs Desert Wilderness Character Unit Fiddler Butte Wilderness Character Unit Fremont	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			Gorge Wilderness Character Unit Mount Ellen/Blue Hills Wilderness Character Unit Mount Hillers Wilderness Character Unit Mount Pennell Wilderness Character Unit Muddy Creek/Crack Canyon Wilderness Character Unit Ragged Mountain Wilderness Character Unit Wildcat Knolls Wilderness Character Unit Additional units were submitted during the draft comment period. These units were evaluated and found not to possess wilderness characteristics: South Sevier Plateau Wilderness Character Unit North Sevier Plateau Wilderness Character Units Tushar Mountains Wilderness Character Units Aquarius Plateau Wilderness Character Units Thousand Lakes Mountain Wilderness Character Units Wasatch Plateau Wilderness Character Units Pahvant Range Wilderness Character Units The Fishlake National Forest and Dixie National Forest has made no administrative endorsements on wilderness areas or any designated wilderness areas. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have officially "designated wilderness areas" or "administratively endorsed lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Therefore, the wilderness character units less than 5,000 acres failed to meet the size requirement for wilderness characteristics. Other submissions over 5,000 acres lacked naturalness.	
Scott Braden	SUWA	North Sevier Plateau Wilderness Character Unit See Maps B and C – The vast majority of the flanks or lower portions of the North Sevier Plateau is managed by the Richfield BLM. Within these areas, 20 separate BLM parcels have been identified that are part of the larger roadless and wilderness character units. These BLM areas are indicated on the accompanying Maps B and C as highlighted in yellow with red demarking wilderness character boundaries.	BLM concludes that the decisions reached in previous BLM inventories and evaluations remain valid. The following units, addressed in the 1996-1999 BLM Re-inventory effort, will not be considered further: Cane Springs Desert Wilderness Character Unit Fiddler Butte Wilderness Character Unit Fremont Gorge Wilderness Character Unit Mount Ellen/Blue Hills Wilderness Character Unit Mount Hillers Wilderness Character Unit Mount Pennell Wilderness Character Unit Muddy Creek/Crack Canyon Wilderness Character Unit Ragged Mountain Wilderness Character Unit Wildcat Knolls Wilderness Character Unit Additional units were submitted during the draft comment period. These units were evaluated and found not to possess wilderness characteristics: South Sevier Plateau Wilderness Character Unit North Sevier Plateau Wilderness Character Units Tushar Mountains Wilderness Character Units Aquarius Plateau Wilderness Character Units Thousand Lakes Mountain Wilderness Character Units Wasatch Plateau Wilderness Character Units Pahvant Range Wilderness Character Units The Fishlake National Forest and Dixie National Forest has made no administrative endorsements on wilderness areas or any designated wilderness areas. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have officially "designated wilderness areas" or "administratively endorsed lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Therefore, the wilderness character units less than 5,000 acres failed to meet the size requirement for wilderness characteristics. Other submissions over 5,000 acres lacked naturalness.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Tushar Mountains Wilderness Character Units See Maps D and E,	BLM concludes that the decisions reached in previous BLM inventories and	Non-WSA Lands

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Tushar Mountains - Just west of Piute Reservoir and along the benchlands of City Creek Peak and Circleville Peak remains several natural BLM parcels that are part of a larger roadless and wilderness character unit. Each of these seven BLM parcels is managed by the Richfield BLM. These BLM areas are indicated on the accompanying Map D as highlighted in yellow with red demarking wilderness character boundaries.	evaluations remain valid. The following units, addressed in the 1996-1999 BLM Re-inventory effort, will not be considered further: Cane Springs Desert Wilderness Character Unit Fiddler Butte Wilderness Character Unit Fremont Gorge Wilderness Character Unit Mount Ellen/Blue Hills Wilderness Character Unit Mount Hillers Wilderness Character Unit Mount Pennell Wilderness Character Unit Muddy Creek/Crack Canyon Wilderness Character Unit Ragged Mountain Wilderness Character Unit Wildcat Knolls Wilderness Character Unit Additional units were submitted during the draft comment period. These units were evaluated and found not to possess wilderness characteristics: South Sevier Plateau Wilderness Character Unit North Sevier Plateau Wilderness Character Units Tushar Mountains Wilderness Character Units Aquarius Plateau Wilderness Character Units Thousand Lakes Mountain Wilderness Character Units Wasatch Plateau Wilderness Character Units Pahvant Range Wilderness Character Units The Fishlake National Forest and Dixie National Forest has made no administrative endorsements on wilderness areas or any designated wilderness areas. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have officially "designated wilderness areas" or "administratively endorsed lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Therefore, the wilderness character units less than 5,000 acres failed to meet the size requirement for wilderness characteristics. Other submissions over 5,000 acres lacked naturalness.	with Wilderness Characteristics
Scott Braden	SUWA	Aquarius Plateau Wilderness Character Units See Maps F, G and H, Aquarius Plateau – East of the community of Antimony consists of three separate BLM parcels that contain wilderness characteristics. Each of these BLM parcels are part of two larger wilderness character units that contain additional public lands within Dixie National Forest, an agency with the ability to manage lands for wilderness under the Wilderness Act.	BLM concludes that the decisions reached in previous BLM inventories and evaluations remain valid. The following units, addressed in the 1996-1999 BLM Re-inventory effort, will not be considered further: Cane Springs Desert Wilderness Character Unit Fiddler Butte Wilderness Character Unit Fremont Gorge Wilderness Character Unit Mount Ellen/Blue Hills Wilderness Character Unit Mount Hillers Wilderness Character Unit Mount Pennell Wilderness Character Unit Muddy Creek/Crack Canyon Wilderness Character Unit Ragged Mountain Wilderness Character Unit Wildcat Knolls Wilderness Character Unit Additional units were submitted during the draft comment period. These units were evaluated and found not to possess wilderness characteristics: South Sevier Plateau Wilderness Character Unit North Sevier Plateau Wilderness Character Units Tushar Mountains Wilderness Character Units Aquarius Plateau Wilderness Character Units Thousand Lakes Mountain Wilderness Character Units Wasatch Plateau Wilderness Character Units Pahvant Range Wilderness Character Units The Fishlake National Forest and Dixie National Forest has made no administrative endorsements on wilderness areas or any designated wilderness areas. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have officially "designated wilderness areas" or "administratively endorsed lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Therefore, the wilderness character units less than	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			5,000 acres failed to meet the size requirement for wilderness characteristics. Other submissions over 5,000 acres lacked naturalness.	
Scott Braden	SUWA	Thousand Lakes Mountain Wilderness Character Units See Map I, Thousand Lake Mountain – Thousand Lake Mountain is a prominent geological feature within Southern Utah. Within this region, large areas of land retain a wilderness character and resource. Not only are these wilderness values including with the Forest Service lands, but additional includes BLM lands. Each of the five parcels are part of a larger roadless and wilderness character units, all of which area managed by the Richfield BLM. These BLM areas are indicated on the accompanying Map I as highlighted in yellow with red demarking wilderness character boundaries.	BLM concludes that the decisions reached in previous BLM inventories and evaluations remain valid. The following units, addressed in the 1996-1999 BLM Re-inventory effort, will not be considered further: Cane Springs Desert Wilderness Character Unit Fiddler Butte Wilderness Character Unit Fremont Gorge Wilderness Character Unit Mount Ellen/Blue Hills Wilderness Character Unit Mount Hillers Wilderness Character Unit Mount Pennell Wilderness Character Unit Muddy Creek/Crack Canyon Wilderness Character Unit Ragged Mountain Wilderness Character Unit Wildcat Knolls Wilderness Character Unit Additional units were submitted during the draft comment period. These units were evaluated and found not to possess wilderness characteristics: South Sevier Plateau Wilderness Character Unit North Sevier Plateau Wilderness Character Units Tushar Mountains Wilderness Character Units Aquarius Plateau Wilderness Character Units Thousand Lakes Mountain Wilderness Character Units Wasatch Plateau Wilderness Character Units Pahvant Range Wilderness Character Units The Fishlake National Forest and Dixie National Forest has made no administrative endorsements on wilderness areas or any designated wilderness areas. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have officially "designated wilderness areas" or "administratively endorsed lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Therefore, the wilderness character units less than 5,000 acres failed to meet the size requirement for wilderness characteristics. Other submissions over 5,000 acres lacked naturalness.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Wasatch Plateau Wilderness Character Units See Map J, Wasatch Plateau – Located along Highway 72, these three BLM parcels are part of the larger roadless and wilderness character unit, mostly consisting of Forest Service lands. These BLM areas are indicated on the accompanying Map J as highlighted in yellow with red demarking wilderness character boundaries.	BLM concludes that the decisions reached in previous BLM inventories and evaluations remain valid. The following units, addressed in the 1996-1999 BLM Re-inventory effort, will not be considered further: Cane Springs Desert Wilderness Character Unit Fiddler Butte Wilderness Character Unit Fremont Gorge Wilderness Character Unit Mount Ellen/Blue Hills Wilderness Character Unit Mount Hillers Wilderness Character Unit Mount Pennell Wilderness Character Unit Muddy Creek/Crack Canyon Wilderness Character Unit Ragged Mountain Wilderness Character Unit Wildcat Knolls Wilderness Character Unit Additional units were submitted during the draft comment period. These units were evaluated and found not to possess wilderness characteristics: South Sevier Plateau Wilderness Character Unit North Sevier Plateau Wilderness Character Units Tushar Mountains Wilderness Character Units Aquarius Plateau Wilderness Character Units Thousand Lakes Mountain Wilderness Character Units Wasatch Plateau Wilderness Character Units Pahvant Range Wilderness Character Units The Fishlake National Forest and Dixie National Forest has made no administrative endorsements on wilderness areas or any designated wilderness areas. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			officially "designated wilderness areas" or "administratively endorsed lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Therefore, the wilderness character units less than 5,000 acres failed to meet the size requirement for wilderness characteristics. Other submissions over 5,000 acres lacked naturalness.	
Scott Braden	SUWA	Thousand Lake Mountain Wilderness Character Units See Map I, Thousand Lake Mountain – Thousand Lake Mountain is a prominent geological feature within Southern Utah. Within this region, large areas of land retain a wilderness character and resource. Not only are these wilderness values including with the Forest Service lands, but additional includes BLM lands. Each of the five parcels are part of a larger roadless and wilderness character units, all of which area managed by the Richfield BLM. These BLM areas are indicated on the accompanying Map I as highlighted in yellow with red demarking wilderness character boundaries.	BLM concludes that the decisions reached in previous BLM inventories and evaluations remain valid. The following units, addressed in the 1996-1999 BLM Re-inventory effort, will not be considered further: Cane Springs Desert Wilderness Character Unit Fiddler Butte Wilderness Character Unit Fremont Gorge Wilderness Character Unit Mount Ellen/Blue Hills Wilderness Character Unit Mount Hillers Wilderness Character Unit Mount Pennell Wilderness Character Unit Muddy Creek/Crack Canyon Wilderness Character Unit Ragged Mountain Wilderness Character Unit Wildcat Knolls Wilderness Character Unit Additional units were submitted during the draft comment period. These units were evaluated and found not to possess wilderness characteristics: South Sevier Plateau Wilderness Character Unit North Sevier Plateau Wilderness Character Units Tushar Mountains Wilderness Character Units Aquarius Plateau Wilderness Character Units Thousand Lakes Mountain Wilderness Character Units Wasatch Plateau Wilderness Character Units Pahvant Range Wilderness Character Units The Fishlake National Forest and Dixie National Forest has made no administrative endorsements on wilderness areas or any designated wilderness areas. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have officially "designated wilderness areas" or "administratively endorsed lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Therefore, the wilderness character units less than 5,000 acres failed to meet the size requirement for wilderness characteristics. Other submissions over 5,000 acres lacked naturalness.	Non-WSA Lands with Wilderness Characteristics
Scott Braden	SUWA	Pahvant Range Wilderness Character Units See Map J, Pahvant Range – These BLM parcels are near the community of Richfield, with each of these being part of the same roadless and wilderness character unit that also encompasses the Forest Service lands. Remaining natural in appearance and character, these parcels have yet to be included within the Richfield DRMP as possessing a wilderness resource. As a result, this information presented here needs to be addressed prior to the final RMP. These BLM areas are indicated on the accompanying Map J as highlighted in yellow with red demarking wilderness character boundaries.	BLM concludes that the decisions reached in previous BLM inventories and evaluations remain valid. The following units, addressed in the 1996-1999 BLM Re-inventory effort, will not be considered further: Cane Springs Desert Wilderness Character Unit Fiddler Butte Wilderness Character Unit Fremont Gorge Wilderness Character Unit Mount Ellen/Blue Hills Wilderness Character Unit Mount Hillers Wilderness Character Unit Mount Pennell Wilderness Character Unit Muddy Creek/Crack Canyon Wilderness Character Unit Ragged Mountain Wilderness Character Unit Wildcat Knolls Wilderness Character Unit Additional units were submitted during the draft comment period. These units were evaluated and found not to possess wilderness characteristics: South Sevier Plateau Wilderness Character Unit North Sevier Plateau Wilderness Character Units Tushar Mountains Wilderness Character Units Aquarius Plateau Wilderness Character Units Thousand Lakes Mountain Wilderness Character Units Wasatch Plateau Wilderness Character Units Pahvant Range Wilderness Character Units The Fishlake National Forest and Dixie National Forest has	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
			made no administrative endorsements on wilderness areas or any designated wilderness areas. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have officially "designated wilderness areas" or "administratively endorsed lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Therefore, the wilderness character units less than 5,000 acres failed to meet the size requirement for wilderness characteristics. Other submissions over 5,000 acres lacked naturalness.	
Scott Braden	SUWA	While the BLM has been at work preparing the Richfield DRMP/EIS for the past several years, the public is inappropriately limited to 90 days to read, analyze and meaningfully comment on this voluminous set of tomes – over 900 pages.	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held six open houses around the State to facilitate review of the Richfield DRMP/DEIS.	Process and Procedures
Scott Braden	SUWA	For this DRMP/EIS, the consideration of more environmentally protective alternatives consistent with FLPMA's requirement that BLM "minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved," is lacking given the dearth of analysis, the limited range of alternatives, and the omission of the Heart-of-the-Redrock Heritage Proposal as an alternative. 43 U.S.C. §1732(d)(2)(a).	Consistent with 43 CFR 8340 and BLM IM 2004-005, the Draft RMP EIS analyzed a wide range of alternatives for motorized use. The commenter lacks specificity to make any individual route evaluations. Appendix 9 has been added in the PRMP/FEIS to provide additional information regarding the route designation process, which is an implementation level decision subject to change. Existing routes within the RFO were analyzed on a case-by-case basis with consideration of other resources and consistency with RMP decisions identified to protect those resources and values. Cumulative impacts associated with travel planning are addressed in Chapter 4 of the DRMP/EIS.	Process and Procedures
Scott Braden	SUWA	BLM's cursory dismissal of the Heart-of-the-Redrock Heritage Proposal is a clear indication of the BLM's refusal to entertain a responsible "opposing view" in the planning process. SUWA's comments about BLM's capricious dismissal of the Heart-ofthe- Redrock Heritage Proposal are included in these comments immediately below.	The Heart-of-the-Redrock Heritage Proposal was an alternative considered but eliminated from detailed analysis as described in section 2.5.2 of the Draft RMP/EIS. However, elements of the proposal are included in Alternatives C and D of the Draft RMP/EIS.	Process and Procedures
Scott Braden	SUWA	Once again, the plan's failure to provide for the area's critical and unique resources – riparian areas, cultural sites, and recreation demand is the most glaring example of the problems with the BLM's narrow approach.	BLM has made decisions based on research and appropriate laws and regulations.The proposed RMP/EIS provides a balanced approach of recreational use and protection of resources, including riparian and cultural.	Process and Procedures
Scott Braden	SUWA	It is imperative that BLM not arbitrarily limit its review to the five alternatives set forth in the DRMP/EIS. Rather, those alternatives should merely be the starting point as BLM reviews comments and determines how best to meet FLPMA's multiple use mandate.	The Proposed RMP/Final EIS has been developed utilizing the analysis of the Draft RMP alternatives and consideration of comments received. The Preferred Alternative B has been adjusted accordingly for the Proposed RMP/FEIS.	Process and Procedures
Scott Braden	SUWA	The BLM has not fully considered and analyzed the Heart-of-the-Redrock Heritage Proposal or meaningfully incorporated it into any of	The Heart-of-the-Redrock Heritage Proposal was an alternative considered but eliminated from detailed analysis as described in section 2.5.2 of the Draft	Process and Procedures

Commentor	Affiliation	Comment	Comment Summary Response	Category
		the alternatives. The Heart-of-the- Redrock Heritage proposal was submitted to BLM by SUWA and local residents as a reasonable alternative aimed at a more balanced approach to managing public lands near Richfield.	RMP/EIS. However, elements of the proposal are included in Alternatives C and D of the Draft RMP/EIS.	
Scott Braden	SUWA	The troubling paragraph dismissing the Heart-of-the-Redrock Heritage Proposal in the Richfield DRMP/EIS can only be interpreted that this reasonable and thoughtful scoping comment was ignored by the BLM in its planning process. While some elements of the SUWA proposal are indeed incorporated into Alternative D, no alternative strikes the same balance of user needs and resource protection offered by the SUWA proposal.	The Heart-of-the-Redrock Heritage Proposal was an alternative considered but eliminated from detailed analysis as described in section 2.5.2 of the Draft RMP/EIS. However, elements of the proposal are included in Alternatives C and D of the Draft RMP/EIS.	Process and Procedures
Scott Braden	SUWA	Recommendations: The BLM must develop alternatives which explore the full range of multiple uses of the lands in the Richfield Field Office, including the protection of undeveloped lands and lands with wilderness characteristics from motorized recreation and industrial development.	The management proposed within the comment was included within the range of alternatives analyzed in the DRMP/EIS.	Process and Procedures
Scott Braden	SUWA	BLM should make planning decisions that protect the resources of our public lands and should not keep routes open to motorized access based on claims that may never even be pursued. If the BLM chooses to designate all R.S. 2477 assertions merely because they have been claimed as routes under R.S. 2477, then the BLM will be in violation of its duty to minimize damage, harassment, and conflicts under the federal regulations	As described on page 1-10 of the Draft RMP/EIS: "Nothing in this RMP extinguishes any valid right-of-way, or alters in any way the legal rights the State of Utah and Garfield, Piute, Sanpete, Sevier and Wayne counties have to assert and protect RS 2477 rights, and to challenge in Federal court or other appropriate venue any use restrictions imposed by the RMP that they believe are inconsistent with their rights." The Proposed RMP/Final EIS has been revised to include a route identification appendix that describes the criteria used to identify routes in the decision area.	Process and Procedures
Scott Braden	SUWA	The DRMP/EIS fails to plan for or analyze how any alternative will fulfill the BLM's obligations to the Central Utah Navajo Sandstone Endemics Conservation Agreement. The agreement is designed to ensure multi-agency coordination in an effort to protect the following sensitive plant species: the Rabbit Valley gilia, Mussentuchit gilia, Harrison's milkvetch, Pinnate spring-parsely, and Maguire's daisy. The agreement, dated August 2006, provides a framework for protecting habitat for these Navajo sandstone endemics in cooperation with Fishlake National Forest, Capitol Reef National Park, US Fish and Wildlife Service and the BLM.	The Central Utah Navajo Sandstone Endemics Conservation Agreement would be addressed by the decision in the Draft RMP/EIS Chapter 2, page 2-24, which states, "Implement the goals and objectives of recovery plans, conservation agreements and strategies..." There is no need to list all such documents in the RMP in order to implement these documents. However, the BLM has updated the list of documents in the Final RMP EIS to include the 2006 Central Utah Navajo Sandstone Endemics Conservation Agreement. The BLM is in compliance with the Conservation Agreement and has modified maps and tables accordingly.	Process and Procedures
Scott Braden	SUWA	The existing relative demand for various recreation opportunities is poorly defined. Here, BLM cites the possibly inaccurate Recreational Management Information System (RMIS) data on this point, and as a result, relies on objectively unverifiable estimations about the demand for motorized recreation.	CEQ regulations implementing the NEPA require agencies evaluating effects on the human environment in an EIS to identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 CFR 1502.22). As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available. Additional information on incomplete or unavailable information can be found in section 4.2.4 of the Draft RMP/EIS.	Recreation
Scott Braden	SUWA	The DRMP/EIS fails to provide an appropriate allocation of recreational opportunities. Although the DRMP/EIS includes a description of the various recreational opportunity "focus areas" for which recreation can	A range of alternatives was considered in the Draft RMP/EIS for recreational opportunities. Areas were identified with corresponding acres for specific recreational opportunities, e.g. WSAs, SRMAs, OHV open and closed areas. The	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		be managed, it is impossible to decipher the acreages within the various classifications under the various alternatives as key information is omitted from the maps and charts.	comment lacks the specificity to identify what key information the commentor seeks. BLM has a multiple use mandate which does not mean that each use must have an equal share throughout the Field Office. Use is based on many factors and resources considerations.	
Scott Braden	SUWA	Based on a review of the maps, however, the alternatives fail to provide adequately for quality, dispersed non-motorized recreational opportunities, especially non-structured, primitive and unconfined recreation which is not afforded by narrowly defined SRMAs and focus areas that cater to specific niche recreation.	The Draft RMP/EIS alternatives do identify dispersed non-motorized and primitive recreational opportunities, some of which would be highlighted within SRMAs. Some would occur within the larger Extensive Resource Management Areas and/or WSAs.	Recreation
Scott Braden	SUWA	This DRMP/EIS does not provide equal recreational opportunities for non-motorized uses – or even try to move toward some semblance of balance.	A range of alternatives was considered in the Draft RMP/EIS for recreational opportunities. Areas were identified with corresponding acres for specific recreational opportunities, e.g. WSAs, SRMAs, OHV open and closed areas. The comment lacks the specificity to identify what key information the commentor seeks. BLM has a multiple use mandate which does not mean that each use must have an equal share throughout the Field Office. Use is based on many factors and resources considerations.	Recreation
Scott Braden	SUWA	The RFO has completely ignored this section of their Handbook. There have been neither market-based strategies developed nor determination of each SRMA's recreationtourism market. There are no RMZs designated and thus there are no corresponding land-use allocations. This is a gross oversight on the RFO's part and should have been offered at this level of the planning process. BLM should supplement the DRMP/EIS with this necessary information in order to be in compliance with its own planning handbook and NEPA.	The SRMA decisions of the DRMP/EIS were developed under the previous Land Use Planning Handbook. Updates to the Handbook occurred concurrently with development of the DRMP. The DRMP/EIS contains recreation management objectives for the specific recreation opportunities to be produced and the outcomes to be attained for the individual SRMAs proposed. The management actions briefly describe an activity planning framework for each SRMA and requires that activity level plans be completed for all SRMAs within 5 years of the RMP ROD. More specific management, marketing, monitoring and administration would be addressed during the implementation phase.	Recreation
Scott Braden	SUWA	Relative to the fact that there is no identifiable market-based strategy, benefits-based strategy, or RMZ designations, it is impossible to fully assess the direct, indirect and cumulative impacts of the management alternatives, as required by NEPA.	The SRMA decisions of the DRMP/EIS were developed under the previous Land Use Planning Handbook. Updates to the Handbook occurred concurrently with development of the DRMP. The DRMP/EIS contains recreation management objectives for the specific recreation opportunities to be produced and the outcomes to be attained for the individual SRMAs proposed. The management actions briefly describe an activity planning framework for each SRMA and requires that activity level plans be completed for all SRMAs within 5 years of the RMP ROD. More specific management, marketing, monitoring and administration would be addressed during the implementation phase.	Recreation
Scott Braden	SUWA	The management actions state that the SRMA will "provide for motorized recreational use, including competitive motorized recreation events," and goes on to provide: • Manage motorized recreational activities to sustain natural resources while meeting social and economic needs. . Provide access ranging from moderate to easy through a full range of motorized vehicle types with little self-reliance and a high or moderate level of interaction between users. • Provide signing and interpretation as needed. • Develop facilities to support motorized and dispersed recreational activities, such as restrooms, staging areas,	The DRMP/EIS contains recreation management objectives for the specific recreation opportunities to be produced and the outcomes to be attained for the individual SRMAs proposed. The management actions briefly describe an activity planning framework for each SRMA and requires that activity level plans be completed for all SRMAs within 5 years of the RMP ROD. More specific management, marketing, monitoring and administration would be addressed and analyzed during the implementation phase.	Recreation

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		loading facilities, and parking areas. These general statements without a more searching and detailed definition of criteria, prescriptions, and objectives is arbitrary and insufficient to adequately evaluate impacts under NEPA.		
Scott Braden	SUWA	SUWA also notes that the potential Big Rocks SRMA, managed for cross-country vehicle travel is within a sensitive cultural area. As a result, the potential open designation would degrade and significantly impact the cultural resources of this unique geologic area. Therefore, the Big Rocks area should not become an open motorized area and all route designations should protect the cultural resources of this cultural area. BLM will need to perform a cultural inventory as well prior to the Final RMP and the potential open motorized designation.	The BLM will perform a Class III cultural resources inventory in the potential Big Rocks SRMA prior to completion of the Final RMP/ROD. Necessary mitigations to protect cultural resources would be identified from the results of the inventory.	Recreation
Scott Braden	SUWA	Recommendation: The RFO should provide an identifiable and definitive strategy for each SRMA and delineate discrete RMZs at this level of the planning process pursuant to the BLM planning handbook and in order to fully assess impacts of such actions under NEPA. A supplemental NEPA document should be completed along with a sufficient comment period in order to correct this gross oversight.	The SRMA decisions of the DRMP/EIS were developed under the previous Land Use Planning Handbook. Updates to the Handbook occurred concurrently with development of the DRMP. The DRMP/EIS contains recreation management objectives for the specific recreation opportunities to be produced and the outcomes to be attained for the individual SRMAs proposed. The management actions briefly describe an activity planning framework for each SRMA and requires that activity level plans be completed for all SRMAs within 5 years of the RMP ROD. More specific management, marketing, monitoring and administration would be addressed during the implementation phase.	Recreation
Scott Braden	SUWA	The DRMP/EIS fails to take a hard look at the impacts from the issuance of SRPs in the planning area. Rather, the DRMP/EIS makes a broad statement that management decisions for the issuance of SRPs “would allow for a variety of SRPs to be issued while providing greater resource protection. DRMP/EIS, p. 4-289. Being that there is no difference among the action alternatives, this analysis is the same for all of the other action alternatives. This claim is not substantiated with any data or evidence, and does not discuss impacts to the environment or cultural resources. This is a major oversight and does not fulfill the requirement of taking a hard look at environmental consequences of the proposed action.	Issuance of SRPs is a discretionary action and are considered on a case-by-case basis. Due to the wide variety of SRP requests and the various conditions and environmental concerns related to each request, site-specific NEPA documents are prepared for each approved SRP. Criteria for issuing SRPs is found in 43 CFR 2932 and BLM Handbook 2930-1.	Recreation
Scott Braden	SUWA	The RFO has failed to consider a reasonable range of alternatives for management actions in regard to the issuance of SRPs. Instead, the DRMP/EIS provides a range of issues in relation to SRP use (i.e. commercial, competitive, and organized group), but no variation whatsoever among the action alternatives. This is against the intent of NEPA, the CEQ regulations, and case law.	Issuance of SRPs is a discretionary action and are considered on a case-by-case basis. Due to the wide variety of SRP requests and the various conditions and environmental concerns related to each request, site-specific NEPA documents are prepared for each approved SRP. Criteria for issuing SRPs is found in 43 CFR 2932 and BLM Handbook 2930-1.	Recreation
Scott Braden	SUWA	There are several factors the BLM should always take into account before an SRP is issued. The DRMP/EIS provides the ideal forum to list such factors by which each SRP should be weighed in future actions. At a minimum, the DRMP/EIS should address the following:	Issuance of SRPs is a discretionary action and are considered on a case-by-case basis. Due to the wide variety of SRP requests and the various conditions and environmental concerns related to each request, site-specific NEPA documents are prepared for each approved SRP. Criteria for issuing SRPs is found in 43 CFR 2932 and BLM Handbook 2930-1.	Recreation
Scott Braden	SUWA	Recommendations: The BLM should study the relationship between	The Draft RMP/EIS considers cumulative impacts from past, present and	Recreation

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		National Park visitation and recreation demands on BLM lands, the types of recreation activities pursued by National Park visitors, the impact of such visitation on recreation visits to BLM lands and the impact that the potential degradation of surrounding BLM lands due to off-road motorize recreation may have on National Park visitation.	resonably forseeable actions, including management of lands by other agencies. See the cumulative impacts section, specifically section 4.7.2.2.	
Scott Braden	SUWA	4. The impact of ORVs and other uses on riparian areas.	Many of the riparian areas in the Richfield Field Office are not accessible to OHV use. The Draft RMP/EIS does note that OHV use has been a factor in some riparian areas functioning at risk (page 3-15). The Draft RMP/EIS also identifies the number of miles and acres that are functioning at risk (Table 3-9). However, most of the areas currently functioning at risk are due to geology (naturally highly erodible soils), invasive plants (e.g., tamarisk), and in some areas, livestock grazing.	Riparian
Scott Braden	SUWA	For riparian impacts, for example, the plan notes that adverse effects from a variety of uses occur in Richfield's riparian areas, and that reasonably foreseeable future uses will make it worse, but that mitigation would happen through implementation of PFC standards. There is no attempt to break down the assessment by alternative, timeline for meeting PFC, or any real quantitative analysis.	The specific strategies to improve the condition of riparian areas that are not functioning properly vary on a case-by-case basis to target the site-specific conditions that have resulted in the impairment. These actions are implementation decisions and are outside the scope of this NEPA document.	Riparian
Scott Braden	SUWA	Additionally the riparian table 3-9 mentions that there are 1,179 acres of evaluated riparian areas in the Richfield Field Office and that 1,053 (89%) are in proper functioning condition, 103 (9%) are functioning-at risk, 23 (2%) are not functioning. The BLM should identify the areas in which ORV use is also permitted (where trails would be designated) and each stream's PFC rating, and discuss the combined effects of grazing and ORVs on these riparian areas.	The Draft RMP/EIS includes an analysis of the number of stream crossings under each alternative (Chapter 4, Table 4-1). Additionally, the analysis identifies impacts of OHV use on riparian areas in section 4.3.4. The PFC ratings are not in a format that currently allows for spatial analysis. The actual PFC reports are maintained in individual riparian files as well as monitoring studies. The Final EIS would be too voluminous to include summaries of each assessment. However, most of the areas currently functioning at risk are due to geology (naturally highly erodible soils), invasive plants (e.g., tamarisk), and in some areas, livestock grazing.	Riparian
Scott Braden	SUWA	The BLM avoids dealing with a range of important issues by declaring some beyond the scope of this plan. The issues of public education, enforcement/prosecution, vandalism and volunteer coordination are not addressed, but are critical to adequately analyzing the feasibility of implementing travel planning decisions and ORV route designations.	The BLM is committed to promoting collaborative partnerships to assist in meeting management goals and objectives of the land use plan.	Scope of Document
Scott Braden	SUWA	Feasibility and estimated costs for implementation of the travel plan are nowhere to be found. BLM has not assessed implementation and enforcement planning. The DRMP is the appropriate document to address these issues.	The BLM's National Planning Handbook (H1601-1) notes that even during implementation of land use plans "there is no requirement to develop a cost/benefit analysis, but management actions that have a high likelihood of improving resource conditions for relatively small expenditures of time and money should receive relatively higher priority" (BM H-1601, IV. E. Developing Strategies to Facilitate Implementation of Land Use Plans).	Scope of Document
Scott Braden	SUWA	Recommendations: The BLM must measure and account for changes in non-market values associated with the level of off-road motorized recreation, oil and gas drilling and other development proposed in this RMP.	BLM does recognize the potential impacts on non-market values due to off-road motorized recreation, oil and gas drilling and other development proposed in this DRMP/DEIS. The lack of available data does not allow for quantification of these impacts. Instead, impacts on such non-market values as recreational experiences were qualitatively analyzed in section 4.6.1, and aesthetic values were addressed	Socioeconomics

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			in section 4.3.7	
Scott Braden	SUWA	The BLM must assess the non-market economic impacts on the owners of the lands in the Richfield Field Office – all Americans. This analysis must include the passive use values of undeveloped lands such as the lands with wilderness characteristics.	Suitable data on the non-market values referred to are not available to BLM. The studies of which the BLM is aware are based on designated wilderness, the results of which may or may not be generalized to other “wild lands.” Even if the studies are generalizable to wilderness study areas (WSAs), closure of lands managed as WSAs is nondiscretionary and beyond the scope of the plan. The BLM does recognize the potential importance of non-market values relative to managing land for wilderness characteristics. The lack of available data makes quantification outside the scope of the DRMP/DEIS. Non-WSA lands with wilderness characteristics that are considered for management by the RFO were qualitatively analyzed for socioeconomic effects. For example, for Chapter 4 Alternative D of the DRMP/DEIS, non-market values from managing 682,600 acres of non-WSA lands with wilderness characteristics are qualitatively discussed.	Socioeconomics
Scott Braden	SUWA	Recommendations: The BLM must collect and analyze actual data on the economic impacts of the alternatives, including Alternative E.	There seems to be some confusion regarding this DRMP/DEIS. There is no alternative E in this Richfield DRMP/DEIS. The BLM will assume that the commentor is referring to Alternative D. This comment is so general as to be unusable. The comment offers no specifics as to what "actual" data BLM failed to use, nor does the comment provide any detail as to where BLM erred in its analysis.	Socioeconomics
Scott Braden	SUWA	The BLM must make a thorough examination of the full socioeconomic impacts likely to occur if the management alternatives are implemented. These analyses must take into account the impacts that BLM land management actions will have on the surrounding communities, including the added cost of providing services and infrastructure, the longterm costs of the likely environmental damage, and the impacts on other sectors of the economy. The BLM must examine the role that protected public lands (including lands with wilderness characteristics) play in the local economy.	The DRMP/DEIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes economic contributions to local communities from various recreational uses, energy production, livestock grazing, and other resource programs. A discussion of this analysis is provided in section 4.6.1. The comment asserts that surrounding communities will have additional costs of providing services, but provides no evidence to support this assertion. The comment asserts that long-term environmental damage from BLM actions are “likely”, but provide no specifics, let alone evidence. The socioeconomic section of Chapter 4 does analyze the impacts of BLM actions to socioeconomics under the resource programs listed in the RMP chapter 4 Environmental Consequences section. Other programs were determined to have little or no impact on socioeconomic conditions.	Socioeconomics
Scott Braden	SUWA	The RMP DEIS does not mention, let alone analyze the well-documented and potentially significant costs associated with off-road motorized recreation.	The comment does not provide references to documentation or other evidence to support this assertion. The DRMP/DEIS does evaluate the socioeconomic impacts of recreational use for various activities, including off-road motorized vehicles. A discussion of this analysis is provided in section 4.6, Impacts To The Social and Economic Environment.	Socioeconomics
Scott Braden	SUWA	3. Chapter 4’s discussion of soils at 4-8 to 4-24 lacks well-considered, informed decisions about broad-scale uses with long-term impacts – such as the designation of thousands of miles of ORV routes.	BLM has made decisions based on research and appropriate laws and regulations. The land uses proposed in this section do not cause impacts that cause undue harm to lands and soils in particular. The preferred alternative provides a balanced approach of recreational use and protection of soil resources.	Soil Resources
Scott Braden	SUWA	6. Given the 3,693 miles of ORV trails the plan proposes to designate,	BLM has made decisions based on research and appropriate laws and	Soil Resources

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		and given the proposed “open” ORV designation areas near Big Rock, Swingarm City and elsewhere, the potential for soil erosion is significant. Soil erosion is one of the primary impacts of ORV use. Yet nowhere in the document is the estimated amount of soil lost to ORV use quantified.	regulations. The land uses proposed in this section do not cause impacts that cause undue harm to lands and soils in particular. The preferred alternative provides a balanced approach of recreational use and protection of soil resources.	
Scott Braden	SUWA	The draft RMP failed to include the Utah prairie dog in its list of federally listed species at Appendix 9. More substantively, the draft RMP fails to provide adequate protection for suitable Utah prairie dog habitat (both unoccupied and occupied) by not sufficiently curtailing land uses deleterious to prairie dogs and their habitat. The primary land uses at issue are livestock grazing, oil and gas drilling and exploration, and ORV use.	The Utah prairie dog was accidentally excluded from Appendix 9 in the draft EIS. This oversight has now been corrected. Additionally, management of the Utah prairie dog is discussed in the RMP-EIS Section 3.3.8.1.5. Table 2-9, page 2-24. This discussion includes a list of actions designed for protection and management of all special status species, including the Utah prairie dog. One of the desired outcomes specifically states the BLM will, "Conserve and recover all special status species (including listed species) and the ecosystems on which they depend." A new recovery plan is in the process of being developed for the Utah prairie dog by U.S. Fish and Wildlife Service. BLM will implement the recovery measures in that plan as resources allow.	Special Status Species
Scott Braden	SUWA	A. Draft RMP does not account for the potential loss to species that are not yet considered special status species, nor realize the full threat to already designated special status species. B. Draft RMP does not take proper measures to identify species of concern in affected areas; their populations, needs, and habits are not thoroughly understood. C. Draft RMP does not account for Special Status Species reliance on other species and habitat necessary to thrive.	BLM recognizes that implementation of the RMP may have an affect on the different flora, fauna, and their habitats that may occur within the planning area boundaries. Recognizing the multiple use mandade that BLM operates under, attempts will be made to minimize adverse impacts as much as possible. Table 2-9 (Special Status Species Decisions), beginning on page 2-24 identifies a list of desired outcomes (Goals and Objectives), Overall Special Status Species Management Guidance, Habitat Mitigation, and Protection of Raptor Habitat. One of these desired outcomes is to "Manage, minimize, and mitigate impacts to plant, fish, and animal species and habitats so that the need to list any of these species as threatened or endangered does not become necessary." Table 2-10 (Fish and Wildlife Decisions), beginning on page 2-26, provides the same guidance and management for non-special status species. The Desired Outcome section of this Table addresses in a general manner all wildlife that may occur within the planning area. As specific projects are proposed, site-specific NEPA analysis will be conducted which will analyze potential impacts to all botanical and wildlife resources. Necessary mitigation or conservation measures will be implemented at that time. Lastly, with regards to to the commentors concern regarding the RMP not accounting for Special Status Species reliance on other species and habitat to survive, BLM recoginzes that the management and protection of habitat (including associated species) is just as important as protecting and managing the species themselves. Therefore, the analyses of these species include a discussion of potential impacts to necessary habitat as well. Beginning on page 4-115 of the draft EIS, it is clearly recognized that habitat alteration (including other species) is a key component of the impact analysis for all special status species.	Special Status Species
Scott Braden	SUWA	A significant number of the scoping comments calling for ORV use to be restricted, the implementation of motorized/non-motorized zones, and that only appropriate, resourcesensitive routes be designated. This request has been largely ignored in the Draft RMP and travel plan	The BLM considered a range of alternatives for non-motorized recreation. Table 2-16 of the Draft RMP/EIS provides for non-motorized access on trails, cross-country and primitive roads. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of	Transportation

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		alternatives. The BLM preferred alternative travel plan includes high route density across the planning area, and wanton designation of redundant routes devoid of clear purpose and need to the very real detriment of non-motorized recreation and resource preservation.	motorized and non-motorized access and recreation. In formulation of the Travel Plan, the BLM specifically considered resource conflicts along with purpose and need for individual routes in the action alternatives.	
Scott Braden	SUWA	Certain elements of the DRMP/EIS, most strikingly the travel plan and OHV designations, fail the UUD standard. By several measures, the proposed travel plan and OHV designations will harm natural resources by increasing cumulative dust and decreasing air quality; unnecessarily fragmenting wildlife habitat; causing unnecessary damage to riparian areas, floodplains and cultural resources; reducing naturalness in areas with identified wilderness characteristics; and, impairing Wilderness Study Areas.	The BLM analyzed the impacts of travel management as outlined and described in Chapter 4 of the DRMP/DEIS. Congress recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. Also, as a matter of clarification, the UUD is a management standard that the BLM applies to third party public land users.	Transportation
Scott Braden	SUWA	In the context of this DRMP/EIS, the decisions made with regard to travel planning must more fully analyze all effects of travel planning and other planning so that all cumulative and site specific environmental and social impacts are adequately analyzed.	Cumulative and social impacts associated with travel planning are addressed in Chapter 4 of the Draft RMP/EIS. Appendix 9 has been included in the PRMP/FEIS to provide additional information regarding the route designation process. Routes were identified and analyzed on a route specific basis in accordance with the BLM National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands.	Transportation
Scott Braden	SUWA	One of the most obvious and consequential flaws in the document is its failure to assess the ongoing impact of existing ORV use in the Richfield Field Office. Instead of analyzing the current impacts of ORV use, the BLM simply treats existing ORV use essentially as a given, and reasons that since continuing use will cause no damage over and above that which occurs now, the existing damage does not need to be studied.	The BLM uses the best available science for resource analysis. See section 4.3.2 Soil Resources. The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Transportation
Scott Braden	SUWA	2. The extent of soil erosion caused by ORVs and other uses.	The BLM uses the best available science for resource analysis. See section 4.3.2 Soil Resources. The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Transportation
Scott Braden	SUWA	1. We reiterate that the BLM's failure to analyze and present information about the impacts of existing ORV use violates its NEPA duties.	The BLM uses the best available science for resource analysis. See section 4.3.2 Soil Resources. The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Transportation
Scott Braden	SUWA	4. The DRMP/EIS never considers or analyzes whether current or proposed ORV use levels are sustainable over the long term.	The current and future trend of motorized use was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation. If OHV use in areas designated as open or limited causes threats or adverse impacts to resources, the BLM would take appropriate steps, including but not limited to use restrictions or closures, installation of additional signs and barricades, restoration of affected areas, etc.	Transportation
Scott Braden	SUWA	Although the DRMP/EIS includes several alternatives for ORV route designations, it fails to include an alternative that would preclude ORV use in WSAs, proposed wilderness areas, non-WSA lands with wilderness characteristics, and other sensitive areas.	WSAs are closed to OHV use under Alternatives C and D. Congress has the authority to propose wilderness areas and therefore they are outside the scope of this land use plan. Non-WSA lands with wilderness characteristics are closed to motorized and mechanized use under Alternative D.	Transportation
Scott Braden	SUWA	The DRMP/EIS fails to provide an alternative avoiding potential environmental effects of designating particular motor vehicle routes. There is little doubt that motorized vehicle routes in sensitive areas	Consistent with 43 CFR 8340 and BLM IM 2004-005, the Draft RMP EIS analyzed a wide range of alternatives for motorized use. The commenter lacks specificity to make any individual route evaluations. Appendix 9 has been added	Travel Management – OHV Route

Commentor	Affiliation	Comment	Comment Summary Response	Category
		including riparian areas, fragile soils, wildlife habitat, cultural resource areas, roadless, and scenic areas can have adverse impacts on those natural resources. Federal regulations (43 C.F.R. 8342.1) require BLM to "minimize damage" to these natural resources, and "minimize conflict" with other users, yet there is no indication in the DRMP/EIS that the Richfield Field Office has considered and analyzed the site-specific environmental consequences and impacts to natural resources and other users of designating any of the motorized routes proposed in the DRMP/EIS. Additionally, the DRMP/EIS fails to analyze the cumulative effects of designating such a widespread network of motorized routes.	in the PRMP/FEIS to provide additional information regarding the route designation process, which is an implementation level decision subject to change. Existing routes within the RFO were analyzed on a case-by-case basis with consideration of other resources and consistency with RMP decisions identified to protect those resources and values. Cumulative impacts associated with travel planning are addressed in Chapter 4 of the DRMP/EIS.	Identification
Scott Braden	SUWA	Guidance at 2-1, IM 2006-173 Contrary to its own guidance, it appears that the BLM has provided no "definitions and additional limitations for specific roads and trails;" no "criteria" for the selection of specific roads and trails like those described in the Guidance; provided no "guidelines" for the management, monitoring and maintenance of the trails, and lastly, there are no "indicators" to guide future planning such as the result of monitoring data or other information. Thus, the travel plan violates the BLM's own rules for designating trails.	Appendix 9 has been added in the PRMP/FEIS to provide additional information regarding the route designation process, which is an implementation level decision subject to change.	Travel Management – OHV Route Identification
Scott Braden	SUWA	Instead of actively choosing routes based on sensible criteria like the need for access, desired future condition and the protection of natural and cultural resources, the BLM simply "inherited" roads and trails from county maps and from off-road vehicle advocates.	A variety of data sources were utilized in developing the route inventory. Criteria was set and ID Team meetings were held to analyze individual routes. An appendix was added to the Final RMP EIS that describes the process used for route designations.	Travel Management – OHV Route Identification
Scott Braden	SUWA	As noted above, the DRMP/EIS does not demonstrate a full range of travel types and modes, or other limitations sufficient to protect the resources at risk from ORV use. In particular, while BLM proposes to designate nearly 4,176 miles of ORV routes, there appears to be zero miles of hiking trail proposed in the DRMP. And because of the obvious public safety and other conflicts present, allowing hikers to use ORV trails is not a solution.	The route/trail identification process is an implementation level decision. The Draft RMP/EIS has been modified to include an appendix that describes how the BLM identified motorized routes. Future implementation level decisions could address route/trail identification for both motorized and non-motorized uses as explained in Appendix 9 of the PRMP/FEIS. This could include changing user type, route/trail alignment, or other management.	Travel Management – OHV Route Identification
Scott Braden	SUWA	There is no way for a reviewer to identify the basis for the specific route designations proposed or confirm that the BLM has ensured that these designations comply with the legal and policy obligations set out above.	Consistent with 43 CFR 8340, the Draft RMP EIS analyzed a wide range of alternatives for motorized use. The commentor lacks specificity to make any individual route evaluations. Route designations are an implementation level decision subject to change.	Travel Management – OHV Route Identification
Scott Braden	SUWA	In order to justify the suitability of the proposed route network, the BLM must provide information on the reasons for designating the routes (i.e., destination, use), impacts of the routes on other resources, how those impacts can otherwise be mitigated or avoided, and the manner in which designation of the route for the proposed use is consistent with the agency's obligations under its regulations and policy. Without this data, the public cannot provide meaningful comments on the inaccuracies in the BLM's analysis and conclusions and also may conclude that the BLM did not comply with its obligations.	Consistent with 43 CFR 8340, the Draft RMP EIS analyzed a wide range of alternatives for motorized use. The commentor lacks specificity to make any individual route evaluations. Route designations are an implementation level decision subject to change.	Travel Management – OHV Route Identification
Scott Braden	SUWA	Recommendations: BLM must develop recreation management	BLM has a multiple use mandate which does not mean that each use must have	Travel

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		directives which reflect the proportional use of the area by non-motorized and/or non-OHV users. BLM must collect and analyze more thorough and accurate data on the costs of off-road motorized recreation in order to make an accurate assessment of the impacts of the alternatives.	an equal share throughout the Field Office. Use is based on many factors and resource considerations.	Management – OHV Route Identification
Scott Braden	SUWA	THE BLM SHOULD NOT DESIGNATE ROUTES OPEN TO MOTORIZED USE BASED ON THE EXISTENCE OF UNPROVEN CLAIMS UNDER R.S. 2477.	As specified in the Draft RMP EIS page 1-10 addressing RS 2477 assertions is 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.	Travel Management – OHV Route Identification
Scott Braden	SUWA	Exhibit C contained recommendations for route designations.	#1 - A portion of this route is county B. The remainder was analyzed as closed within the range of alternatives. #2, #4 - #6, #10 - #16, #19, #20 - Closure was analyzed within the range of alternatives. #3, #8 - Proposed as closed. #7 - Closure was analyzed within the range of alternatives. Proposed as open for access to SITLA. #9 - A portion of this route is county B. The remainder would remain open to the NPS Trailhead. #17 - #18 - Route data was corrected. Only a non-motorized trail occurs across the Dirty Devil Drainage at this location. #21 - #30, #32 - #34, #36 - #40 - Closure of routes in WC areas was analyzed within the range of alternatives. #31, #35, #42 - #44 - Closure of the all ORV Open Area was analyzed within the range of alternatives. Boundaries of the proposed open areas were developed with consideration and consistency with other resources and decisions of the RMP. #41 - Closure would be inconsistent with management prescriptions identified for protection of the R&I values of the proposed ACEC. #45 - Route designations within this area would be consistent with resource concerns and decisions of the RMP. Coordination regarding routes extending onto CRNP has occurred.	Travel Management – OHV Route Identification
Scott Braden	SUWA	1. The presence of non-native species like cheatgrass (particularly important in light of its role in the spread of wild fire).	The Draft RMP/EIS, Chapter 3 section 3.3.4.5 identifies noxious and invasive species. The document was revised to include the a description of the condition of invasive species throughout the Field Office.	Vegetation
Scott Braden	SUWA	3. The impact of ORV use on native plants, special status species and threatened and endangered species.	Impacts of OHV use on vegetation, regardless of native or non-native status, are discussed in the Draft RMP/EIS Chapter 4, in the Vegetation Section 4.3.4, under the subheadings "Impacts from Recreation" and "Impacts from Travel Management." Additionally, the Central Utah Navajo Sandstone Endemics Conservation Agreement would be addressed by the decision in the Draft RMP/EIS Chapter 2, page 2-24, which states, "Implement the goals and objectives of recovery plans, conservation agreements and strategies..." There is no need to list all such documents in the RMP in order to implement these documents.	Vegetation
Scott Braden	SUWA	2. ORV impacts to vegetation are largely ignored. For example, Chapter 4's discussion of this impact is limited to two paragraphs, neither of which is quantitative in nature and which do not assess the probability of ORVs introducing and facilitating the spread of non-native species. However, areas open to cross-country OHV use (8,400 acres) would be more likely to experience surface disturbance and destruction of	Impacts of OHV use on vegetation are discussed in the Draft RMP/EIS Chapter 4, in the Vegetation Section 4.3.4, under the subheadings "Impacts from Recreation" and "Impacts from Travel Management." These sections were modified to include more detail on impacts from OHV use on vegetation.	Vegetation

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		vegetative resources in those areas.		
Scott Braden	SUWA	The DRMP/EIS also fail to plan for the protection or even consideration of certain vegetative resources. The BLM cites a native grass community unaffected by grazing, one of few native range ecosystems that remain, in or near T29S R4E Section 9.19 There is also no consideration of the relict bristlecone pine stands located in T30S R5E Section 14. Id.	The area in T29S R4E is on the Teasdale Bench allotment and is part of an active grazing permit. The allotment has not been actively grazed by livestock for several years. However, the existing vegetation is the result of past grazing and is not relict vegetation. The relict bristlecone pine stand is topographically isolated and does not require specific protection measures.	Vegetation
Scott Braden	SUWA	1. Lands proposed for wilderness designation, WSAs or lands with wilderness characteristics should be managed as Class I to "preserve the existing character of the landscape."	IM-2000-96 states "it is the Bureau position… that all WSAs should be classified as Class I, and managed according to VRM Class I management objectives until such time as the Congress decides to designate the area as wilderness or release it for other uses." The IM further explains "…the VRM management objectives are being used to support WSA management objectives. For WSAs, this is not only about visual values as many WSAs do not necessarily contain exceptionally high scenic values. The primary objective of WSA management is to retain the WSA's natural character essentially unaltered by humans during the time it is being managed as a WSA." As the VRM I objective is to "preserve the existing character of the landscape" (BLM-H-8410) such a designation would perfectly compliment WSA management as explained in the IMP. The BLM as flexibility to decide how to manage non-WSA lands with wilderness characteristics.	Visual Resources
Scott Braden	SUWA	Ways in WSAs should be closed unless monitoring shows that they are not impaired.	The IMP allows for continued use of inventoried ways in WSAs during the WSA phase. The IMP does not specify that ways will be opened or closed. The way would be closed, if the way is causing unnecessary and undue degredation. The establishment of the WSA included the condition of the inventoried ways and BLM is required to maintain at least that status.	Wilderness Study Areas
Scott Braden	SUWA	As discussed below, SUWA maintains that BLM has the authority and the responsibility pursuant to FLPMA section 202 to fully analyze and adopt an alternative that would designate new wilderness study areas. BLM's failure to fully consider and analyze such an alternative is fatal to its analysis.	The BLM is not authorized to designate "Non-WSA Lands with Wilderness Characteristics" as WSAs or manage these lands under the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). The BLM authority to establish new WSAs pursuant to Section 603 of FLPMA expired no later than October 21, 1993, therefore designation of new wilderness areas or WSA proposals are decisions outside of the scope of the DRMP/DEIS.	Wilderness Study Areas
Scott Braden	SUWA	In order to fulfill the mandates of the IMP, BLM should select the alternative which causes the least harm and provides the most benefits to the wilderness characteristics in the WSAs – Alternative D. In addition, any motorized routes left open in WSAs must meet the criteria of the IMP and the BLM's ORV regulations, showing that they do not impair wilderness suitability.	FLPMA allows for continued OHV use on inventoried ways in WSAs during the WSA phase. The IMP specifies that there be no unnecessary and undue degradation to the WSAs.	Wilderness Study Areas
Scott Braden	SUWA	Recommendations: All routes designated in WSAs should be specifically identified in the RMP as "ways" and distinguished from "roads," since WSAs are, by definition, roadless.	The Proposed RMP/Final EIS has been revised to identify ways in the WSAs. By definition, WSAs do not have roads, trails, or routes.	Wilderness Study Areas
Scott Braden	SUWA	The BLM should adopt the approach to management set out in IM ID-2008-016, including creating a baseline of conditions in the WSAs, setting out a detailed monitoring program, incorporating standards for	This instruction memorandum specifially applies to WSAs in Idaho and not in Utah. The IMP has monitoring requirements.	Wilderness Study Areas

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		determining if use of these ways is impairing wilderness values, and committing to take measures to end any such impairment immediately, including through closure and restoration of ways.		
Scott Braden	SUWA	The DRMP/EIS provides that if any of the WSAs are released from wilderness consideration by Congress, then the areas would be examined "on a case-by-case basis for consistency with the goals and objectives of the RMP decisions," but does not provide further specificity. DRMP/EIS, p. 2-91. This approach does not give sufficient consideration to protecting the wilderness characteristics of these areas.	As described in Table 2-20, if the WSAs are designated or released, Congress will provide management direction at that time.	Wilderness Study Areas
Scott Braden	SUWA	One of the most obvious and consequential flaws in the document is its failure to assess the ongoing impact of existing ORV use in the Richfield Field Office. Instead of analyzing the current impacts of ORV use, the BLM simply treats existing ORV use essentially as a given, and reasons that since continuing use will cause no damage over and above that which occurs now, the existing damage does not need to be studied. BLM needs to include the impact of ORV use on wildlife and wildlife habitat.	Impacts to wildlife and wildlife habitat from OHV use under the No Action Alternative are presented on page 4-161 of the Draft RMP-EIS to establish a baseline for comparison of the alternatives. NEPA requires the comparison of the RMP alternatives back to the no action alternative. The RMP presents a range of alternatives, which includes more restrictions on OHV use. The variation of impacts under each alternative are presented in Section 4.3.9.	Wildlife and Fish
Scott Braden	SUWA	A. The DRMP/EIS does not provide a sufficient analysis of the effects of habitat fragmentation. Recommendations: In order to comply with the requirements of NEPA to conduct a thorough analysis of impacts of the management alternatives and to facilitate meaningful public participation and review of the DRMP/EIS, the BLM must thoroughly analyze the specific impacts of habitat fragmentation on affected species and provide a comparison of the management alternatives, as described in detail above.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7.	Wildlife and Fish
Scott Braden	SUWA	Despite the accepted and readily available scientific study and methods, the Richfield DRMP/EIS fails to conduct a sufficiently detailed analysis of fragmentation, which impairs the consideration of impacts of the various alternatives and prevents an informed comparison.	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7.	Wildlife and Fish
Scott Braden	SUWA	Recommendations: In order to comply with the requirements of NEPA to conduct a thorough analysis of impacts of the management alternatives and to facilitate meaningful public participation and review of the DRMP/EIS, the BLM must thoroughly analyze the specific impacts of	The DRMP/DEIS addresses the past, present, and reasonably foreseeable future actions. The existing condition and trend of the various resources described in the DRMP/DEIS Chapter 3 (e.g., soil resources, wildlife habitat, water resources, livestock grazing, transportation, minerals and energy) are the result of past	Wildlife and Fish

Commentor	Affiliation	Comment	Comment Summary Response	Category
		habitat fragmentation on affected species and provide a comparison of the management alternatives, as described in detail above.	management actions. Therefore, impacts from past management actions are reflected in the baseline condition of resources as described in Chapter 3 of the DRMP/DEIS. Anticipated impacts from present actions and proposed future actions are reflected in Chapter 4 of the DRMP/DEIS. Anticipated impacts from actions associated with the alternatives are in the DRMP/DEIS Chapter 4 Section 4.3 through 4.6. Anticipated impacts from actions outside the decision area are contained in DRMP/DEIS Chapter 4 Section 4.7.	
Scott Braden	SUWA	BLM should apply the guidelines for sage-grouse management set out in A Blueprint for Sage-grouse Conservation and Recovery.	Although the BLM may not have used the specific article listed by the commentor in development of the DRMP/DEIS, the BLM appreciates the commentor informing us of this blueprint. The BLM will review the guidelines and use them as needed in the development of the greater sage grouse analysis.	Wildlife and Fish
Scott Braden	SUWA	Recommendations: The DRMP/EIS should not only fully analyze the impacts of habitat fragmentation but also consider and adopt a management alternative that substantially reduces the levels of fragmentation in the planning area.	Alternatives C and D place more restrictions on resource uses and more area designations (e.g., ACECs, etc.) to protect sensitive resources that would in effect reduce habitat fragmentation. The effects on habitat fragmentation associated with each of the alternatives are presented in Section 4.3.9.	Wildlife and Fish
Scott Braden	SUWA	C. Managing lands to protect their wilderness characteristics reduces fragmentation and provides better habitat; the DRMP/EIS should acknowledge these benefits and consider more alternatives to protect habitat.	The benefits afforded to fish and wildlife from non-WSA lands with wilderness characteristics is presented in Section 4.3.9, page 4-182. Alternatives C and D place more restrictions on resource uses and more area designations (e.g., ACECs, etc.) to protect sensitive resources that would in effect provide more habitat protections.	Wildlife and Fish
Scott Wheeler		The BLM has designed about 2600 hundreds acres as open for motorized cross country travel at Factory Butte that is not enough and should be expanded to at least 16,000 acres, find accompanying map showing proposed boundary. These boundaries would use natural and man made barriers to defme the area; the east side by the Factory Butte Road the North by a road, the west by a Reef and a road and the south by Caineville Mesa, maybe even a buffer along highway 24 would be appropriate. This larger area would help to disperse users and their impacts and the need to designate and sign any trails around these two pinnacles.	BLM has considered the proposals submitted by several commentors. The commentors' proposal is included within the range of alternatives considered within the Draft RMP/EIS. The Proposed RMP/Final EIS has been revised to address the proposal and the commentors' concerns. Several surveys and clearances will be required to identify the location of specific trails. The exact location of any trails will be clearly marked. The general location of trails, kiosks, fences, and other facilities are identified in the Proposed RMP/Final EIS. The location of these facilites will be specified in activity level planning. The area will be strictly monitored to include compliance with the plan. Following BLM policy, the RFO will take a cooperative management approach to implement the plan.	Transportation
Scott Wheeler		Shown on the accompanying map are routes linking Hanksville, Factory Butte and the Temple Mountain area. I have ridden most of these trails on a motorcycle, some several times. The route heading east to Highway 24 and north of the Muddy river near the boundary of Emery and Wayne counties turns into a single track trail in one area, most of the other routes would be accessible by at least an ATV.	The Temple Mountain area is within the PFO. The RFO DRMP/EIS does not address route designations for the PFO. Routes between Hanksville and Factory Butte area were analyzed and designated unless closed or restricted for resource concerns. Additional data on routes has been submitted for this area and would require site specific NEPA analysis which would need to be completed following completion of the RMP.	Travel Management – OHV Area Categories
Scott Wheeler		none of the BLM's route alternatives designate any single track or 52" ATV trails in this area even though most of it is now closed to cross country travel, there are a number of existing routes that traverse the area, where are they? It appears that that someone sat at desk in an office looking at lOOk maps preparing the different alternatives with little time spent in the field actually with their hands in the dirt; the route inventory for single track trails is inadequate.	Maps were created to differentiate the designation of the route, not the route classification. This level of detail is not appropriate for the level of planning within the Draft RMP EIS. There are routes identified for 50" or less for OHV use which will be discussed in implementation level planning. Single track trails were not inventoried in the initial route inventory. The commentor lacks specificity to make any individual route evaluations. Route designations are an implementation level decision subject to change. Maps of finer detail can be accessed at the RFO	Travel Management – OHV Route Identification

Commentor	Affiliation	Comment	Comment Summary Response	Category
			reading room.	
Seth Bowers	Utah 4 Wheel Drive Association	With regard to the Special Recreation Permits, the limit at 10 vehicles and 20 people is too small. A simple family reunion under these guides would require 2 permits. I beieve a realistic workable limit would be closer to 25 vehicles and 50 people.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Shirley Fujimoto	Union Telephone Company	Thus, the BLM should prepare a Final EIS and revised RMP to encourage and facilitate the siting of this infrastructure on federal lands in the Richfield Resource Area.	In the Draft RMP-EIS, the desired outcomes in Table 2-18 (page 2-76) states "Use right-of-way corridors and collocate new proposals within existing sites or right-of-way areas, to the extent practical, in order to minimize adverse environmental impacts and the proliferation of separate rights-of-way."	Lands and Realty
Stephen Trimble	Words & Photographs	Sagebrush communities are disappearing at astonishing rates all over the West. Parker Mountain harbors a remarkably intact sagebrush ecosystem-with precious habitat for Sage Grouse, Utah prairie dog, and pygmy rabbit.	The sagebrush-steppe habitat was one of the resources found to be relevant and important for the potential Parker Mountain ACEC.	Areas of Critical Environmental Concern
Stephen Trimble	Words & Photographs	Likewise, the Henry Mountains deserve significant protection. The Henrys are unique geologically. They harbor rare island mountain ecological environments. They provide spectacular wilderness characteristics. Their wildlife, including the bison herd, needs special attention.	This area was considered in the range of alternatives and is available for the decisionmaker to consider in developing the Proposed RMP and ROD.	Areas of Critical Environmental Concern
Stephen Trimble	Words & Photographs	The Badlands ACEC protects an internationally significant physiographic gem-home to endemic, plants and endangered cacti. The sculptural beauty and delicate soils of the Mancos shale deserve interpretation, not destruction. Erosion of the shale slopes from rampant ATV use degrades water quality in the Fremont River-with repercussions to the water quality in the entire downstream Colorado River Basin.	This area was considered in the range of alternatives and is available for the decisionmaker to consider in developing the Proposed RMP and ROD.	Areas of Critical Environmental Concern
Stephen Trimble	Words & Photographs	Alas, I must express my disappointment, as well. The comment period is too short. To expect the public and affected agencies to respond so quickly to the vast amount of material in this and the other Utah RMPs in these few short weeks is absurd. It took eight years to develop the plans. And now you are rushing toward a final product with little time for discussion. I believe the BLM should extend the comment period significantly-at least by two months. If you rush to judgment, I believe you are exposing yourself unnecessarily to legal action.	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held six open houses around the State to facilitate review of the Richfield DRMP/DEIS.	Process and Procedures
Steve Allen allensteve@juno.com		I have been following and commenting on the Richfield Office's plans for protecting Wild and Scenic Rivers within your domain for the past several years. Having just read the plan in its entirety, I am most unhappy with the decisions you have made. For reasons that are not fathomable, you have not included many waterways that meet the definition of Wild, Scenic, or Recreational. First, I do congratulate you on	The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendices 2 and 3 fully disclose the review and evaluation process for determining which river segments are eligible and suitable	Wild and Scenic Rivers

Commentor	Affiliation	Comment	Comment Summary Response	Category
		including all of the Dirty Devil River, and the Fremont River Gorge in your proposal. But they are just a small part of the lands that are under your control. The canyons that you have left out of the proposal are also worthy. I could list many, and have to you in previous missives, but let me note just a couple of canyons that are certainly more worthy than others. 1. Robbers Roost Canyon is the largest tributary to the Dirty Devil. It is also the most heavily visited of the Roost tributaries; it is a favorite for multi-day backpacking trips and has become one of the most heavily visited by technical canyoneers in recent years. Except for cattle grazing in the past, and the occasional illegal foray by ORVs into the present, this canyon system is spectacular at every twist and turn. It must be included as a Wild River. By including more rivers and waterways in your Wild and Scenic River plan you are taking a stand: that quiet recreation is part of the multiple-use concept that drives the BLM. From my perspective of having been on this land for a lifetime, you are making it very plain that there is little room within your field area for quiet recreation and by implication, these areas should be left to the "noisy" recreationists. I hope you reconsider your proposal and include more canyons and waterways in your proposal. I support including all of the canyons that you, the Richfield BLM Field Office, determined were worthy of Wild, Scenic, or Recreational Rivers in your inventory process.	for such designation.	
Steve Allen allensteve@juno.com		2. Trachyte Creek: While some of the proposed canyons do not have a permanent flow of water, Trachyte Creek does (except in the very driest of summers, which can also be said of the Dirty Devil, the San Juan, etc.). This canyon, besides the good water, is also packed with prehistoric and historic sites, including some of the earliest inscriptions in the Glen Canyon area. Except for cattle and sheep grazing in the past, this canyon is in good condition and deserves to remain that way. It, too, should be a part of the Wild River system. It is perhaps more historically significant than any other canyon under the control of the Richfield BLM Office.	Eligibilty findings are completed. Public comments on the Draft Wild and Scenic River Eligibilty Report were requested in March 2004. Upon finalization of that report (Appendix 2 in the Draft RMP/EIS), the decision to be made in the RMP NEPA process no longer includes eligibilty findings. Suitability decisions are made only on the segments found eligible in Appendix 2.	Wild and Scenic Rivers
Steve Edmunds		Special recreation permits must not be overly restrictive. The current proposal prevents school activities, field trips, family reunions. The threshold should be more than is 75 people and no language regarding a two hour occupancy should exist.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Steve Edmunds		Access to campsites needs to remain open. Many roads and trails are marked for closure which prevents our family from our camping vacation.-SRMA's should not result in route closures, all current roads and trails should remain open.	SRMAs can be identified to manage for a variety of recreation users and settings, which can include motorized use and non-motorized use. SRMAs do not automatically close routes. Decisions regarding OHV use within SRMAs were made to support the recreation setting and opportunities desired for the SRMA by alternative.	Recreation
Steve Edmunds		Transporation - All of the alternatives include new management philosophy of "closed unless designated open" - Much different than the	The maps in the Draft RMP/EIS display designated routes, designated routes with seasonsal closures or size/width restrictions, and closed routes. Additionally,	Transportation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		previous management practice of open unless designated closed. With the new mnagement practice, all maps provided only display closed routes. The RMP fails to adequately inform the public of the trails that are designated open. The current alternatives fail to show exiswting routes and roads that should be open and have been thus far.	route maps were available for public review during the public comment period. Copies of the maps were available in the Richfield Field Office, at six public meetings, on CD, and on the BLM planning website.	
Steve Edmunds		Open motorized access areas. The current alternatives will force all OHV users into a very small area and will result in congestion and extreme high useage that will result in significant resource damage - none of alternatives address this management problem, or offer added recreation resources to mitigate an increase occupancy.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Steve Edmunds		As Congressional Designated Wilderness Areas. Any WSA's should not be managed in a manner as a wilderness enacted by Congress. Areas with Wilderness character should still allow motorized access to those who will stay on trails and roads.	WSAs are managed according to the IMP not as Congressionally Designated Wilderness Areas.	Wilderness Study Areas
Steven Edmunds Steve@Steve-Edmunds.com		BLM should recognize the RS2477 road claims that are part of the Sanpete, Sevier, Piute, Garfield and Wayne County Transportations Plans. The validity of these claims should be determined before a final decision is made in this RMP. We believe Sanpete, Sevier, Piute, Garfield and Wayne Counties should be consulted regarding all road decisions prior to finalizing the RMP.	As described on page 1-10 of the Draft RMP/EIS: "Nothing in this RMP extinguishes any valid right-of-way, or alters in any way the legal rights the State of Utah and Garfield, Piute, Sanpete, Sevier and Wayne counties have to assert and protect RS 2477 rights, and to challenge in Federal court or other appropriate venue any use restrictions imposed by the RMP that they believe are inconsistent with their rights."	Consultation and Coordination
Steven Edmunds Steve@Steve-Edmunds.com		Reducing group sizes to 10 vehicles is unreasonable to the public. Special Recreation Permits should only be for an event such as one held on public lands where a club, for instance, collects a fee from participants in order to enjoy the event. That would be a viable use for an SRP.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Steven Edmunds Steve@Steve-Edmunds.com		If these routes are currently open they should remain open. Access to these WSA's has already been severely restricted. We do not believe that they should be further restricted.	A range of alternatives considered a number of options for the inventoried ways in WSAs.	Wilderness Study Areas
Steven Manning	Utah Archaeological Research Institute	No roads should be closed without consultation with all Native American Tribes.	BLM is committed to consult with Native American Tribes as required by 36 CFR 800.2 and described in BLM Manual 1820 and Handbook 1820. Appropriate implementation level actions will follow the BLM's established protocol for consultation.	Consultation and Coordination
Steven Manning	Utah Archaeological Research Institute	We want to note here that there needs to be a Horseshoe Canyon Archaeological District created that is equivalent to the Bull Creek Archaeological District. It should include the entire canyon system. We have found that there are at least an equal number, if not a greater number of significant archaeological sites in the Horseshoe Canyon drainage than there are in the proposed Bull Creek Archaeological District, and they are more dispersed throughout time. A Horseshoe Canyon Archaeological District would be similar in boundaries to the Horseshoe Canyon South WSA and Horseshoe Canyon ACEC (Map 2-	There is a separate process for nominating and designating an area as an archaeological district under the NHPA, as outlined in 36 CFR 60. FLMPA does not require the BLM to complete this process through land use planning, therefore, this is outside the scope of this NEPA document.	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		24). Such a designation would preserve the important archaeological sites in this area and promote their study, as in the Bull Creek Archaeological District.		
Steven Manning	Utah Archaeological Research Institute	We discovered one error in the management plan in Table 2-6a, page 2-19. The table does not list, in any alternative, a scientific use for rock art. We have been conducting scientific studies (formulation of and testing of hypothesis for the meaning of prehistoric images) at rock art sites since November 7, 1983. Rock art should be categorized for scientific use in at least one alternative. We request that in alternative B rock art be changed to Scientific, since Traditional/Public Use is in Alternative A, C and D.	As defined in BLM manual 8110, the scientific use category involves “methods that would result in the property's physical alteration or destruction.” The traditional and cultural values associated with rock art are not compatible with consumptive use under any conditions. Allocation to traditional, public or conservation use, as allocated in the Draft RMP/EIS would still allow for non-destructive studies.	Cultural Resources
Steven Manning	Utah Archaeological Research Institute	Therefore, we request that Discharged be removed from Alternative B, under lithic without diagnostics, and replaced with Scientific, with conditions that if the number of lithics is small, the site has been subsurface tested and there are other larger lithic scatters with the same type of lithic material in the general vicinity, the site could be Discharged.	The meaning and cultural value of lithic scatters has been debated for several years within in the archaeological profession. Until it can be demonstrated that there is scientific value to non-diagnostic lithic scatters, these sites will be managed according to one of the use allocations in the alternatives.	Cultural Resources
Steven Manning	Utah Archaeological Research Institute	Since there are no alternatives stated in this plan that adequately protect cultural resources and yet provide access for scientific studies, we ask that either another alternative be included or the present alternatives be modified so one or more of them reflects the following: 1. All cross-country off-road vehicle travel be prohibited in areas containing National Register eligible cultural resources that could be damaged by direct impacts (i.e., driving over the site, etc), and all off-road unlicensed vehicles be prohibited on existing roads in areas containing National Register eligible cultural resources. 2. All existing roads and "ways" that provide direct access (i.e., the road ends at the site or goes through the site) in areas that contain National Register cultural resources, where those resources that could be damaged by indirect impacts (i.e., people collecting artifacts, carving or painting their names on the rock art, etc.) be closed within approximately 1/4 mile from the site or rerouted to avoid the site. 3. All existing roads and "ways" in areas that contain National Register eligible cultural resources should remain open for licensed vehicular travel. Existing roads are roads shown on USGS 7.5' topographic maps - some are not shown but are obvious because standard licensed vehicles with four wheels can drive on them. NOTE: Most discussions in the DRMP limit travel in restricted areas to, "Limited to Designated Roads". This is not acceptable. This designation allows too many roads to be closed! The designation must be: "Limited to Existing Roads". These roads must be kept open to provide access for scientific studies at archaeological sites and for Native American people to access cultural sites. Open roads also allow for increased law enforcement, cultural resources personnel, and site stewards to monitor	Each alternative presented in the Draft RMP/EIS provides adequate protection of cultural resources to varying degrees to meet management goals and objectives. The travel management plan includes the criteria to identify routes based on purpose and need weighed against resource conflicts.	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		cultural sites and cultural areas. Ofcourse, there should be exceptions, such as seasonal closures, closures to protect wildlife and rare native vegetation, parallel routes, etc.		
Steven Manning	Utah Archaeological Research Institute	In chapter 3, page 3-19, concerning Rock Art. If you want to be adequate and accurate, you should add (after "At some sites, designs have been pecked into the rock and then painted") at other sites images were painted, then features were created by pecking away the paint and the rock's surface.	The Draft RMP/EIS has been modified to include the commentor's language.	Cultural Resources
Steven Manning	Utah Archaeological Research Institute	Concerning (page 2-37, Map 3-9), we are familiar with most of these areas, having located archaeological sites in many of them, and our experience has shown that the lands shown on Map 3-9 do not qualify as lands with wilderness characteristics. They were not designated as WSA's in the original inventory and there was a reason for that. These areas may contain fences, earthen stock reservoirs, corrals, salting locations, recreation intrusions, cowboy camps and overgrown seismic lines. And most important, they also contain roads. Many of these roads have been in existence for over 50 years and they are still being used today.	The presence or absence of man-made intrusions does not mean that an area does not possess wilderness characteristics. It is the cumulative significance of these features that determines if an area possesses wilderness characteristics. On-the-ground conditions have in many cases changed since the 1979 inventory. As part of BLM's 2007 wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM is confident of high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.	Non-WSA Lands with Wilderness Characteristics
Steven Manning	Utah Archaeological Research Institute	The BLM's Richfield Office Resource Management Plan and Environmental Impact Statement is inferior because of the way it is organized.	The Draft RMP/EIS follows the BLM Land Use Planning Handbook (BLM-H-1601-1) guidance.	Process and Procedures
Steven Manning	Utah Archaeological Research Institute	It is our recommendation that you modify Table 2-17 to make it perfectly clear when you are talking about "existing roads", "designated roads", OHVs and licensed passenger vehicles. You should add the words OHV in every Issue where you discuss OHVs and make it clear when you are discussing licensed passenger vehicles. And you should not discuss OHVs in sections listing other discussions. It makes it too confusing. Note: If you look at page 2-90, just above the page number, you will see how clearly the title states: Off-Highway Vehicle Designations. Please make certain that all Issues have clearly defined titles.	When any discussion of OHV routes occurs within the RMP, the intended use is for any type of motorized vehicle as defined by the BLM National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands dated January 2001. The BLM does not differentiate between OHV use of routes and licensed passenger vehicle use of routes (43 CFR 8340.0-5). These vehicle classes are not separated in the Draft RMP/EIS. There is no requirement to separate these vehicle classes.	Process and Procedures
Steven Manning	Utah Archaeological Research Institute	We have a general objection to this entire section. With apparently no rhyme or reason, subjects are interjected in random places, which makes for a greater complexity than necessary. For example on Page 2-52 the heading is Recreation, yet there is a discussion about managing oil and gas leasing. You need to keep oil and gas leasing in the section on oil and gas leasing. Note that oil and gas leasing is not discussed in other sections in this alternative.	Oil and gas leasing is discussed in the Draft RMP/EIS page 2-52 as it directly relates to the management of the Dirty Devil/Robbers Roost SRMA, and the recreational setting, experience and potential benefits therein.	Recreation
Steven Manning	Utah Archaeological	The DRMP states in Table 2-16, Recreation Decisions, Issue: Overall Recreation Guidance (page 2-44): that regulations would: "Allow no rock climbing within 300 feet of cultural resources". We request that that this	The BLM's specialists have reviewed the site in question, and are familiar with other cultural sites in areas popular for rock climbing. The commentor presents no evidence that an area-wide increase in the rock-climbing restriction is needed	Recreation

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Research Institute	distance be increased to 500 feet from rock art sites. We ask for this change because it has been determined that the rock art was placed in specific locations to interact with shadows created by the sun and nearby rock formations as it travels throughout the year. In some instances, Quitchupah Creek for example, a rock appears to have been placed on a ledge to cast a shadow on a specific element or elements in a petroglyph panel at a specific time or times of the year, thus creating a calendrical function to the site. Rock climbers can intentionally or unintentionally move, or even remove such a rock, which might be seen to them as an obstacle.	to protect cultural sites. Given the lack of additional evidence, the BLM stands by the existing language and the level of protection it will provide for cultural sites.	
Steven Manning	Utah Archaeological Research Institute	Rock Art viewing is gaining in popularity. Consider that the new Utah motor vehicle license plate has rock art depicted on it. Rock art as a recreational destination is not considered in the DRMP/DEIS (Page 4-283).	The Draft RMP/EIS considers the public use of rock art sites on Table 2-6a.	Recreation
Steven Manning	Utah Archaeological Research Institute	Additionally, we see no evidence of a cost analysis associated with each alternative.	The CEQ Guidelines for Implementation of the Procedural Provisions of the NEPA does not require preparation of a cost-benefit analysis for all EISs. The regulations state that "If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences (40 CFR 1502.23 Cost-benefit analysis). The Federal Land Policy and Management Act (FLPMA) requires that BLM manage the public lands for Multiple Use. Section 103(c) of FLPMA defines Multiple Use as follows: "The term 'multiple use' means . . . harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." Additionally, given that the implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and funding, etc., there is no way to meaningfully evaluate costs and benefits of the alternatives. Therefore, a cost-benefit analysis is not central to the planning effort and is not required for consideration of multiple-use planning alternatives. After selection of an alternative to establish multiple use, costs and benefits of management actions may be considered, depending on priorities and funding. The BLM's National Planning Handbook (H1601-1) notes that even during implementation of land use plans "there is no requirement to develop a cost/benefit analysis, but management actions that have a high likelihood of improving resource conditions for relatively small expenditures of time and money should receive relatively higher priority (BM H-1601, IV. E. Developing Strategies to Facilitate Implementation of Land Use Plans).	Scope of Document
Steven Manning	Utah Archaeologi	One issue not discussed under recreation is target shooting. Many people are shooting guns at targets on BLM Lands. The problem is that	Eliminating target shooting is not a land use plan decision. The Draft RMP/EIS is not required to include a detailed analysis of illegal activities. Enforcing the RMP	Scope of Document

Commentor	Affiliation	Comment	Comment Summary Response	Category
	cal Research Institute	shooting at targets soon escalates into shooting at everything else, including BLM signs.	decisions is an implementation-level action.	
Steven Manning	Utah Archaeological Research Institute	Five management options do not offer sufficient alternatives to allow an adequate listing of all alternatives for public lands and their resources. Is there some reason that there has to be five alternatives? What if there are six viable alternatives? What if there are fifteen viable alternatives? Do you combine them or just leave some out? Confining management strategies to five different options restricts management alternatives, and thus it is not an adequate approach to effectively manage our public lands.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. The BLM determined that a single alternative analyzing the protection of all non-WSA lands with wilderness characteristics would best provide a reasoned choice among the alternatives. Although the other alternatives do not provide specific management prescriptions to protect non-WSA, these alternatives analyze and disclose the impacts of the proposed resource management prescriptions, uses and actions on the non-WSA lands with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these non-WSA lands. If all alternatives contained comparable protections of the non-WSA lands with wilderness characteristics, the alternatives would have substantially similar consequences and would not be significantly distinguishable. The BLM, in developing the Proposed RMP/Final EIS, can chose management actions from within the range of the alternatives presented in the Draft RMP/EIS and create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple-use mandate.	Scope of Document
Steven Manning	Utah Archaeological Research Institute	Many of these roads in all of these areas provide access to archeological sites where we conduct scientific research. Many of the roads provide access to areas that we haven't even begun to explore for archaeological sites. This closure will make it impossible for us to access various areas with the result that significant archaeological discoveries are going to be lost.	Administrative access may be granted for certain uses by a BLM permit on a case-by case basis. These restrictions only apply to motorized access; there is a variety of other forms of non-motorized access that can be used to reach these sites.	Transportation
Steven Manning	Utah Archaeological Research Institute	Since access to archaeological sites is absolutely essential for us to continue making significant archaeological discoveries, the RFO's proposed road closures will result in the termination of most of this research.	Administrative access may be granted for certain uses by a BLM permit on a case-by case basis. These restrictions only apply to motorized access; there is a variety of other forms of non-motorized access that can be used to reach these sites.	Transportation
Steven Manning	Utah Archaeological Research Institute	Having spent a considerable amount of time out doors camping, we have found that the sound caries many times farther from two-cycle vehicles than from four-cycle vehicles. In WSAs and in the other classes where noise is a concern, a four-cycle vehicle would not protrude on recreational experiences or wildlife the same as a two-cycle motorcycle. This not discussed. Therefore, we ask that this distinction be made in	When any discussion of OHV routes occurs within the RMP, the intended use is for any type of motorized vehicle as defined by the BLM National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands dated January 2001. The noise-levels created by these vehicles is not regulated by BLM policies, nor is it included in the definition for OHVs.	Transportation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		the DRMP/DEIS and appropriate discussions and actions be added to all section discussing OHV use.		
Steven Manning	Utah Archaeological Research Institute	There needs to be a statement added to each alternative on page ES-l and ES-2 (as well as 2-2 and 2-3) stating how many miles of existing roads will be closed under each alternative. We define a road as being a route over which commercially produced passenger vehicles can travel. Most of these are shown on USGS topographic maps. Other statistical facts are given in the summary but the impacts of the DRMP/DEIS on road closures is not evident in this table.	The Draft RMP/EIS Executive Summary (Table 5 on page ES-7) does identify the miles of routes identified under each alternative. Additionally, Table 2-17 of Chapter 2 of the Draft RMP/EIS (page 2-74) describes the proposed number of miles of routes in each alternative.	Travel Management – OHV Route Identification
Steven Manning	Utah Archaeological Research Institute	On page ES-7 the heading at the top of the page is "Route Designations" (the heading in the previous section on the previous page is "OHV Area Designations") and the text suggests that the topic is discussing roads that would be open or closed to motorized vehicles. Table 5 however is labeled "OHV Route Designations". This is confusing, and the confusion exists throughout the DRMP/DEIS. Are you combining OHV use of roads and licensed passenger vehicles in the same category? We hope not. Because they are separate issues and separate vehicle classes, they should have separate categories, issues and alternatives. Just because you close an area to OHVs it does not mean that is has to be closed to licensed passenger vehicles. Please separate these issues, please separate vehicle classes, and make separate categories with appropriate discussions of the two issues.	OHV area designations are RMP decisions that identify lands as open to cross country OHV use, limited OHV use in some manner, or closed to OHV use. OHV route identifications are an implementation level decision that allows for identification of specific routes in the limited OHV category. The BLM does not differentiate between OHV use of routes and licensed passenger vehicle use of routes (43 CFR 8340.0-5). These vehicle classes are not separated in the Draft RMP/EIS. There is no requirement to separate these vehicle classes.	Travel Management – OHV Route Identification
Steven Manning	Utah Archaeological Research Institute	If you will not agree to delete this section, then at least delete alternative D. If alternative D is included the lands will, " ...be closed to motorized and mechanical use ...". This closure will result in the loss of significant scientific archaeological information, American Indians will be unable to access sacred sites, access to Utah State lands where archaeological research and inventory is taking place will be lost (see map 3-29 to see how much state land in included in these non-WSA lands with no wilderness characteristics), law enforcement activities will be curtailed, cultural resources personnel will be hampered in their activities, site stewards will be unable to monitor cultural sites and cultural areas, etc.	Administrative access may be granted for certain uses by permit on a case-by case basis. These restrictions only apply to mechanized access; there is a variety of other forms of non-motorized access that can be used to reach these sites.	Travel Management – OHV Route Identification
Tod Petersen tod701@aol.com		Please disclose the difference in management prescriptions between "non WSA lands with wilderness characteristics" and WSAs in the FEIS. The 1999 inventory found lands that contain extensive OHV trails to have "wilderness characteristics." If the presence of OHV use did not impact the presence or absence of "wilderness characteristics," then by what rationale is the BLM proposing to significantly reduce OHV trails in these areas? The SEIS is utilizing the Utah BLM 1999 statewide wilderness re-inventory. This inventory was based on criteria that were not available for public comment and review. As an OHV user who will be directly affected by your decision, regulations say I should have a chance to review and comment on such criteria. The BLM is establishing	The BLM will not manage non-WSA lands with wilderness characteristics under the non-impairment standard prescribed in the IMP. The IMP only applies to WSAs. Alternative D of the Draft RMP/EIS proposed the most protective management for all non-WSA lands with wilderness characteristics, providing a full range of alternatives to analyze which is consistent with FLPMA. Within the PRMP/FEIS, certain non-WSA lands with wilderness characteristcs have been identified for specific management protection. Those areas and the management prescriptions are detailed within Chapter 2 of the PRMP/FEIS.	Non-WSA Lands with Wilderness Characteristics

Commentor	Affiliation	Comment	Comment Summary Response	Category
		new WSAs without the authority to do so. Calling a new WSA by a different name does not make it legal. I support Alternative "A" in the DEIS, but I also strongly support the county proposed "compromise" proposal for the Factory Butte SRMA.		
Todd Ockert landuse@ufwda.org		I believe the information and data collected by the BLM in Table 3-26 is faulty. The BLM's own report indicates that critical information was not available for this table. In my personal experiences I don't believe the numbers to be accurate. I do not believe that any decisions should be made based upon this faulty table.	The best available information that is pertinent to management actions was used in developing this DRMP/DEIS. Considerable effort has been taken to acquire and convert resource data into digital format for use in this DRMP/DEIS. Data was acquired from both the BLM and from outside sources (see DRMP/DEIS Page 4-3).	Help
Todd Ockert landuse@ufwda.org		I support the special Recreation Management Zone for the Hog Canyon area, however I believe the BLM needs to allow for additional trails to be added to the area in the future… This area could benefit by added trails and an expanded trail system.	This is a comment on the Kanab RMP not the Richfield RMP.	Recreation
Todd Ockert landuse@ufwda.org		I support the inclusion of a Special Recreation Management Area for the John R. Flat area as suggested by KaneCountyofficials… I believe that this SRMA should be added to Alternative B.	This is a comment on the Kanab RMP not the Richfield RMP.	Recreation
Todd Ockert landuse@ufwda.org		do not believe that group sizes should be limited to 25 people under the proposed Special Recreation Permit. This number in my opinion is unrealistic and makes group events such as family picnics or scouting events impossible. I believe the rules and authorized exceptions for theses SRP' s should be clarified and added to Alternative B.	The RFO established the group numbers in consultation with other agencies for the RMP based on consistency with other offices and agencies to avoid confusion and improve management, recreation carrying capacities and impacts on resources for long-term sustainability of group use. The two hour group occupation criteria has been removed in the Proposed RMP/Final EIS.	Recreation
Todd Ockert landuse@ufwda.org		I believe that Alternative B is missing some historically accessed roads. I believe Canyon Country 4x4 Club has brought all of these roads to your attention. I believe they should be added to Alternative B. In addition, I believe that the BLM should recognize the RS2477 road claims that are part of Kane and Garfield Counties Transportation Plans. The validity of these claims should be determined before a final decision is made in this RMP. I believe Kane and Garfield counties should be consulted regarding all road decisions prior to decision.	As specified in the Draft RMP EIS addressing RS 2477 assertions is 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.	Travel Management – OHV Route Identification
Todd Ockert tjockert@comcast.net		Although I previously noted that I seldom have the desire or need to utilize opportunities or areas that offer cross-country (off-route travel), I could not help but notice that Preferred Alternative "B" proposes to permit cross-country travel opportunities on less than 1% of the Resource Management Plan lands within the Richfield Field Office jurisdiction. Due to the significant increase in numbers of people that are seeking OHV recreation opportunities (increase of 42% from 1994-2004), I suggest that a less severe curtailment would preserve management flexibility into the future. I reviewed the Alternative "A" SRMA exhibit in Map 2-8 for comparison with the Preferred Alternative "B" exhibit Map 2-9 . It seems to me it would be a wise investment (from a future management perspective) to include a suitable section or two of the Sahara Sands site as shown on the Alternative "A" map for future "open" OHV use since the environmental assessment work has already	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories

Commentor	Affiliation	Comment	Comment Summary Response	Category
		been done. It does not necessarily follow that sites approved in anticipation of future demand need to be opened prematurely. These sites are in close proximity to the Hanksville BLM Office which should improve management oversight and enforcement efforts. As with all public land use opportunities, in the event funding does not meet the budgetary requirements for responsible resource protection, management by closure is always an available option. OHV Travel Management acreage shown as "open" (cross-country travel permitted) under Alternative "N" = 1,636,400; Alternative "A" = 449,000; in contrast with the 8,400 acres in the Preferred Alternative "B". Perhaps a modest increase in the acreage as I suggested above (with an eye to the future) would be wise and still be considered balanced.		
Tom Greene tomgree@gmail.com		So much of Utah needs to be protected as a resource for future generations. Allowing Off-road vehicles in wilderness study areas threatens the natural habitat and destroys the experience for those of us who would like to quietly enjoy the wilderness.	IMP allows for continued OHV use on inventoried ways in WSAs during the WSA phase. The travel management plan in the RMP designates which inventoried ways will be available for motorized use.	Wilderness Study Areas
Toni Thiriot		As a property owner in Grover on Miners Mountain Road my comments concern two parcels of land listed in Table A 5-4 as tract 19 and 20: Tract 19 (T.30S., R.5E., Sec.3 E1/2 SE 1/4 SE1/4) 20 acres, Tract 20 (T.30S., R.5E., Sec.11., W1/2 W1/2-less mineral patent 43-77-006)+1260 acres. Concerning Tract 19: 1. It is my understanding that the Federally listed threatened plant species Last Chance Townsendia, Towensendia aprica, has been identified as existing on this parcel. That alone should preclude the listing of this property for sale. The BLM should continue to implement conservation measures to reduce adverse impacts to this plant. 2. Some of the issues related to Tract 20 also affect Tract 19. These include the impact of possible development on domestic water use on adjourning lands which are mine, and the use of these acres as habitat for deer and turkey and rabbit which the hunters enjoy and brings revenue to the state. Most private lands in this area prohibit hunting.	Conservation strategy for the Central Utah Navajo Sandstone Endemics Conservation Agreement dated August 14, 2006 does not address Townsendia aprica. However, prior to further consideration for disposal of tracts, site specific Biological Assessment and/or other required resource program surveys and consultation would be completed. Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: "Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action" This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty
Toni Thiriot		Concerning Tract 20: I. First of all, the proposed area for sale includes 8.5 acres that I own.	The RMP provides management actions for BLM adminstered lands, and therefore does not apply to privately owned lands. A title verification would be conducted prior to any disposal actions.	Lands and Realty
Toni Thiriot		Concerning Tract 20: 2. This property includes Carcass Creek, one of the very few perennial streams in this arid area providing important riparian habitat for resident wildlife populations. This stream also has important use for the Grover irrigation Company servicing a number of farm parcels. The stream is considered critcal Mule Deer and Elk habitat by the Utah Division of Wildlife Resources as it provides food, water, and seclusion for deer and elk that forage on adjacent agricultural land in large numbers year round. This property provides a corridor from	To ensure the BLM is in accordance with the Policy Statement 7 of the Riparian Management Policy, if an application to purchase any of the tracts is received, a full NEPA analysis and on-site surveys, inventories and assessments will be conducted at that time, to clearly demonstrate if the specific site (riparian) is so small or isolated that it cannot be managed in an effective manner by BLM or through agreement with State or Federal agencies or interested conservation groups. This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer	Lands and Realty

Commentor	Affiliation	Comment	Comment Summary Response	Category
		National Forest land to Privates lands for foraging. Additionally, it provides vital habitat for a large flock of wild turkeys for breeding, nesting and brood-rearing on a year round basis. Large herds and flocks spend winter on this property. The Miners Mountain Road area is a well known hunting area because of these numbers. It would be a significant loss to wildlife, nature observers, and hunters if this valuable property were not maintained in its natural state by the BLM. Carcass Creek is also important as it provides water for livestock and down stream irrigation. Although no a perennial stream, Rock Creek also flows through the subject land and provides water for wildlife, livestock, and irrigation purposes.	and may, therefore, preclude disposal.	
Toni Thiriot		Concerning Tract 20: 3. If this property was sold and developed for homes, the availability of domestic water would be at risk and a critical issue: The area is not able to accommodate further development. Several current landowners in the area have had problems in the past few years with decreased capacity (inlcuding myself) and complete drying up of water in their wells necessitating re-drilling or finding other sources for water. Several of the existing wells have had significantly diminished capacity and static levels during periods of drought. Drought appears to be here to stay.	Any disposal would recognize valid existing rights. In Section 1.5.2 of the DRMP/DEIS under Planning Criteria, it is noted that: - The RMP will recognize the existence of valid existing rights. - The RMP will comply with applicable laws, regulations, executive orders, and BLM supplemental program guidance. - BLM will consider the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity. Valid existing rights include water rights and all applicable laws include State water laws.	Lands and Realty
Toni Thiriot		Concerning Tract 20: There are other properties more appropriate for use and sale that do not have these threats so it does not seem necessary to put these tracts up for sale. Grover is an unincorporated area that does not have the infrastructure to deal with a significant increase in homeowners and monitor and control water use and other resources. A timely example was Thanksgiving 2007 when Grover had a black out with Garkane Energy due to the number of people visiting and using electricity for the holiday. this land should remain as public land to the utilized by all, human and animal life alike.	Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action.” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty
Toni Thiriot		Concerning Tract 20: 5. Scenic Byway 12, is designated an All American Highway. The subject lands are within the viewshed of Highway 12. There are few scenic byways designated All American Highway. The Draft RMP has not addressed the impact of viewshed preservation under the scenic byway designation. Another reason these tracts should remain under BLM supervision.	Table 2-18 Lands and Realty Decisions has been modified as follows to help clarify land tenure adjustment process once an application has been filed to acquire any parcel of public land: “Critical Elements of the Human Environment and other resource issues identified through public and agency involvement would be adequately considered and appropriately evaluated. Certain elements of the human environment are subject to requirements specified in statutes, regulations, or executive orders. Program specific consultation would occur (if required), and respective on-site surveys and documented clearances would be obtained prior to any land disposal action.” This subsequent analysis and documentation may reveal resource conditions that could not be mitigated to the satisfaction of the authorized officer and may, therefore, preclude disposal.	Lands and Realty
Tracy Nielson		Their needs to be a designated route around or thru cacti areas so as to	This was considered within the range of alternatives.	Transportation

Commentor	Affiliation	Comment	Comment Summary Response	Category
		not restrict routes around Factory Butte. Use signs and kiosks showing where they are so we will stay away from them.		
Tracy Nielson		The orange line should be the boundary but I will live with the Ridg Line N&S HWY 119 to HWY 24 being the edge as there is a trail we've ridden here since 1982 when I moved here. The area in yellow can be closed. The area between the yellow and your boundry is loaded with trails we ride and will continue to ride as they are part of the trails we have ridden before I moved here in 1982. See Orange dash line as acceptable boundry on the east side.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. The boundaries of the Rainbow Hills Open Area were developed for consistency with other resources and decisions of the RMP.	Travel Management – OHV Area Categories
Travis M. Tams travisrun@aol.com		We have had so many wonderful memories camping, riding and recreating together. Over the years I have seen trail after trail and area after area closed to riding. Can I ask What the term Public Land means to you? I am sick and tired of your one sided public service. What have you done to ensure that my family will be able to carry on this personal and wonderful tradition of riding together? You MUST HEAR THE VOICE OF THE WHOLE PUBLIC!!! I am sad to think that my grandchildren would not have an opportunity to ride the area that contains the spectacular Factory Butte and Caineville Badlands. As a member of a Motorcycle Club we have spent years and years maintaining trails, working on G.P.S.Trail Compilation trying to do everything we can to perserve The land we love. Only to have it taken away time after time. I will be the first to help with trail maintainence, trail marking or creating an adequate inventory of existing trails in this area. What ever is needed to keep Public Lands open for my family and friends and future generations to enjoy.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. San Rafael, Hondo Arch, and Hidden Splender area are not within the RFO.	Travel Management – OHV Area Categories
Troy Scotter	Utah Rock Art Research Association	The BLM has a responsibility under the Historic Preservation Act, Section 110 to inventoried, pro-actively manage and nominate rock art and archeology sites to the National Register of Historic Places. Clearly the BLM and is failing to meet its section 110 obligations. Pro-active cultural surveys are not taking place. We believe that the BLM must enhance the funding of cultural resource protection in order to meet its statutory obligations.	Nominating and designating sites to the National Register of Historic Places is not a process to be done through RMP planning. The BLM does perform Section 110 inventories, and these, along with Section 106 make up all of the cultural resource information that presently exists, that is what forms the basis for the Draft RMP/EIS discussion. Adjusting funding for cultural resource protection is outside the scope of this NEPA document.	Cultural Resources
Troy Scotter	Utah Rock Art Research Association	The BLM methodology for assessing cultural implications varies from region to region. In general, it emphasizes site densities without considering site importance and is generally based on predictions rather than actual inventories or knowledge of the areas. At a minimum, the BLM should have considered the sites already documented, considered the national register criteria for the sites. and then supplemented this information with site density modeling or professional judgment. We have yet to find an RMP that indicates how many of the known sites within the region are protected by some level of cultural designation.	The baseline cultural resource data that we used for the RMP is the best available information at the present time and constitutes BLM's present knowledge of the current situation, in accordance with FLPMA. The protection of cultural resources was considered in developing a range of alternatives for the Draft RMP/EIS.	Cultural Resources
Troy Scotter	Utah Rock Art	Cultural resources should have been a key component in the preparation of the regional management plans.	Section 102 of FLPMA declares one of the guiding policies of the BLM is to protect cultural resources. As required by law and described in the Draft RMP/EIS	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Research Association		(Chapter 5, section 5.3), the BLM has also initiated formal consultation with American Indian Tribes and the State Historic Preservation Office. The BLM does not have any legal requirements to consult with special interest groups interested in a given resource or area, but as described in Chapter 5 of the Draft RMP/EIS (section 5.2), the BLM has sought to provide several opportunities for interested members of the public and/or organizations to provide input into the planning process. Cultural resources have been identified as an issue during the scoping process, and throughout the RMP planning process. Members of the public and organizations have had several opportunities to participate in the planning process, including 1) the identification of issues during the scoping period from November 1, 2001 through April 1, 2002; 2) the identification of issues and raising specific concerns at five public scoping meetings held in March, 2002; 3) responding with comments and input when the BLM requested input in Planning Post 3 in March, 2004; 4) requesting communication at the request of interested parties (see Draft RMP/EIS Chapter 5 section 5.2.5); 5) providing comments on the adequacy of the NEPA document and/or providing additional information during the public comment period on the Draft RMP/EIS from October 26, 2007 through January 23, 2008; and 6) providing comments on the adequacy of the NEPA document and/or providing additional information during six public meetings in December 2007. The BLM will provide additional opportunities for public input in the NEPA process for the Richfield RMP, in compliance with NEPA and BLM and CEQ regulations. Additionally, the BLM will continue to work with interested members of the public and organizations through the various projects and activities associated with implementing the RMP.	
Troy Scotter	Utah Rock Art Research Association	We recognize the difficulty for the BLM in providing the public with detailed maps of the alternative proposals. However, the scale of the maps provided in the documentation is insufficient for us to determine where specific archeological sites are within the map boundaries. We are comparing the maps to know archaeological site locations. However, we are not even able to determine if whole canyons are included within map boundaries, let alone individual sites. On multiple occasions BLM officials have not been able to respond to questions regarding map features because the RMP maps are too general.	The maps in the Draft RMP/EIS were generated at the best practical scale to convey the decisions being made for the size of the publication. In addition, maps in various formats are available at the Field Office upon request.	Maps
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	North Otter Creek This region should be designated an ACEC. The images in this region are unique. They were created by the Native Americans of the region that had been pushed out of their historical lands and were taking shelter from persecution by the early Mormon pioneers. These painted glyphs are located within a current campground just south of Greenwich. They represent a unique archeological heritage that must be protected and documented. Campgrounds and rock art are a dangerous combination for rock art protection.	The current campground in the Greenwich area is west of Greenwich. This campground is managed by the Fishlake NF, therefore is outside of the jurisdiction of this NEPA document.	Areas of Critical Environmental Concern
Troy Scotter troyscotter@co	Utah Rock Art	Manning Canyon This area should be designated as an ACEC. This canyon was a likely travel route to the Fish Lake mountains. The rock art	As required by BLM's ACEC handbook (1613.41), the Richfield Field Office encouraged the public to submit ACEC nominations during public scoping. ACEC	Areas of Critical Environmental

Commentor	Affiliation	Comment	Comment Summary Response	Category
mcast.net	Research Association	and archeology span a broad period of time from the archaic period to modern times. Some of the figures are unique to the area. The rock art panels cover a relatively small area. We would be happy to provide specific site information to the BLM if you are unaware of this location. Due to the small size of this potential ACEC, alternative management options could be considered which would not disclose the boundaries. Existing OHV spur roads from the Paiute Trail should be closed.	nominations were specifically requested in the Notice of Intent to prepare a land use plan from November 1, 2001. The BLM received several requests for additional ACECs during the public comment period on the Draft RMP/EIS. However, these requests did not contain enough information supplied to assess the proposals for their relevant and important values.	Concern
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	North Wash We believe this canyon should be designated an ACEC. North Wash was a cultural corridor from lower to higher elevation areas. The canyon contains several significant rock art sites including the spectacular Barrier Canyon Style "Moqui Queen" at Hog Springs, panels across the road from this location, archaic panels at mile marker 27, and a Navajo site that receives current cultural use. The panels at mile marker 27 are especially significant because an archaic figure includes a bow and arrow. This provides temporal limits on both the style and the introduction of the bow and arrow into the region. Although this site has received no protection, in the past or under this RMP, it is one of the most important panels in the state.	The North Wash area was considered as an ACEC for cultural R&I values. This area was considered in the range of alternatives as part of the Dirty Devil ACEC for the for the decisionmaker to consider in developing the Proposed RMP and ROD.	Areas of Critical Environmental Concern
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	Bubble Caves We believe this area should be designated an ACEC. These caves, south of Monroe and east of Joseph have painted figures that tie into the figures previously described under the North Otter Creek area. The panels incorporate unique rock features in the design of the glyphs. OHV traffic on the current roads appears reasonable. However, we are concerned that this area is permitted for oil and gas development. We believe that no surface occupancy for mineral extraction is essential considering the fragile nature of the rock surfaces on which the figures are painted.	As required by BLM's ACEC handbook (1613.41), the Richfield Field Office encouraged the public to submit ACEC nominations during public scoping. ACEC nominations were specifically requested in the Notice of Intent to prepare a land use plan from November 1, 2001. The BLM received several requests for additional ACECs during the public comment period on the Draft RMP/EIS. However, these requests did not contain enough information supplied to assess the proposals for their relevant and important values.	Areas of Critical Environmental Concern
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	Bull Creek Archeological District West of Bull Creek are several sites of national significance. We believe the district boundaries should be extended to include Upper Town Wash, Avery Seep, and the Stone Corral site south of Upper Town Wash and should be given ACEC protections. These areas include Archaic style sites including a rare Chihuahuan Polychrome site that has been abraded and superimposed with a Barrier Canyon Style figure. Stone Corral was a food processing and habitation site with images on both the ground and ceiling surfaces. We believe that this entire area should be managed to include all of the priorities we list in our ACEC designation.	The Bull Creek Archaeological District was considered as an ACEC for cultural R&I values. This area was considered in the range of alternatives as an ACEC in Alternatives C and D. Therefore, these are available the for the decisionmaker to consider in developing the Proposed RMP and ROD.	Areas of Critical Environmental Concern
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	Quitchupah Ethnographic surveys conducted by the BLM have indicated that Quitchupah is a sacred canyon to the Paiute tribe who consider the entire canyon to be a ceremonial location. Local lore also indicates that Quitchupah canyon was a route used by the Uintah Ute tribe traveling to Fish Lake for the annual Sun Dance Ceremony. Ute rock art figures are found in the canyon. Sites in the canyon range from ritual locations that	The checkerboard land ownership pattern in the Quitchupah area makes designation and management of a large ACEC impractical. A larger boundary was submitted early in the RMP/EIS process, but the ID Team determined the boundaries as described in the Draft RMP/EIS would protect the R&I values on BLM lands.	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
		consist of only a small cairn to Fremont, Paiute, Ute, and outstanding Barrier Canyon and other Archaic rock art. Current ACEC boundaries proposed in alternatives C and D are so small that they would constitute effective disclosure of archeological site locations and fail to protect important sites. We strongly believe that this ACEC should be implemented under any alternative but that the boundaries be expanded to include all BLM land one mile on either side of the creek from Highway 10 to the Forest Service boundary. This would include more sites of importance while providing less disclosure of their locations. These expanded boundaries would include pithouses, archeoastronomy sites, rock art, and ceremonial locations. Combined these sites create an archeological complex that would be of more importance for scientific understanding of the ancient people who lived in and used the canyon. We also advocate a land swap with State Trust Lands for the parcel of land at the junction of Quichupah and North Creek. This would create a contiguous archeological corridor. We support the suggestions for protection of archeological resources included in the current ACEC description.		
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	Only three sites within the region have been nominated to the NRHP, of these only two protect pre-historic cultural resources. Many other sites are eligible, but the BLM has not been pro-active to list them on the NRHP or protect them (Page 3-20/21). This is despite the BLM's own understanding that site conditions are deteriorating. Based on limited site monitoring, the trend of site conditions in the RFO is considered to be downward. Indications of active vandalism or collecting (unauthorized digging and "pothunting") have been observed in limited instances. Archaeological and historic sites are known to be deteriorating from a variety of causes. Many sites are deteriorating from natural causes and many others from the illegal activities of artifact collectors. Inadvertent damage from construction projects also impacts resources. Collectively, these agents have adversely affected and continue to adversely affect many known cultural resources. (Page 3-23) Given this observation, it is difficult for us to reconcile the minimal level of protection to archeological resources provided under any of your proposals.	The BLM takes its Section 110 responsibility seriously. Up until 1980, Section 106 of the NHPA required agencies to consider the effects of their undertakings only on properties listed on the National Register of Historic Places. At that time, there were efforts to nominate sites to the Register so that they could receive the protection afforded by such a listing. However, the situation changed in 1980 when Section 106 was amended to require agencies to consider an undertaking's effects on properties included in or eligible for inclusion in the National Register. Since that time, very few properties have been nominated to the National Register because the management and protection of sites listed in or eligible for Register listing has been the same. Therefore, sites that are listed on the National Register receive no additional protection. Draft RMP/EIS Table 2-6, Cultural Resource Decisions, outlines by alternative which areas would receive priority for Section 110 inventories. Proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the Field Offices.	Cultural Resources
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	It is our understanding that Section 106 (16 U.S.C. § 470f) obligates the BLM to consider the effects of management actions on cultural resources listed or eligible for listing to the National Register of Historic Places. Section 110 of the NHPA requires the BLM to manage and maintain those resources in a way that gives "special consideration" to preserving archaeological and cultural values. Section 110 also requires the BLM to ensure that all historic properties under the jurisdiction or control of the agency are identified, evaluated, and nominated to the National Register of Historic Places. Id. § 470h-2(a)(2)(A). How can the	The baseline cultural resource data that we used for the RMP is the best available information at the present time and constitutes BLM's present knowledge of the current situation, in accordance with FLPMA. Since the Section 106 and 110 inventories that have been done make up all of the cultural resource information that presently exists here, that is what forms the basis for the RMP discussion. Any surface disturbing activities based on future proposals would require compliance with Section 106 and site specific NEPA documentation.	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		BLM claim to be honoring their legal responsibilities when they are not using real data regarding archeological sites to make management decisions? We do not support a decision-making process which is not based on actual rock art and archeological site inventories.		
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	None of the alternatives provided under this RMP provide any information as to how many of the known archeological sites are protected. Without this basic information it is difficult to assess the level of protection being provided to archeological resources under any of the options.	The BLM's policy is to protect all cultural resources. Protection is accomplished largely through avoidance of disturbance of sites, which is the BLM's preferred method of mitigation.	Cultural Resources
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	In addition to ACECs, Monticello is proposing the designation of Cultural – Special Recreation Management Areas and Cultural - Special Management Areas (C-SMA). Regardless of the designation, whether it be C-SMA, C-SRMA, or Cultural ACEC we think that the significant archeological sites we mention below should be protected with the following minimum provisions: ? Area is managed for archeological resource management and protection ? Site locations should not be publicly disclosed unless BLM conditions for sites managed for public conditions be met ? Archeological resource inventories should be completed and sites fully IMACS documented ? No surface disturbance for oil and gas or mineral development ? No leasing for oil and gas or mineral development since this creates roads that encourage access to archeological locations and causes degradation of sites through dust and vehicular exhaust ? Significant sites should be nominated to the NRHP given the high degree of documentation that this process requires ? OHV access, camping, climbing, and other recreational activities should not be permitted within a quarter mile of sites ? VRM Class 1 since rock art is created in a geographical context ? No gunfire due to the amount of damage that rock art has historically sustained through shooting. In this proposal we generally recommend the use of ACEC designations to protect archeological resources, but we can accept alternative designations that include the previously listed provisions.	The designations the commentor raised are not all designed to manage for the protection of cultural resources. SRMAs are identified to address areas requiring more intensive management than ERMAs, but the management objectives focus on recreational settings, experiences, and benefits. ACECs are designated to protect relevant and important values, and management is developed to specifically protect those values. The management actions for each ACEC were designed to protect and prevent irreparable damage to the relevant and important values. A standard set of management for all ACECs is not practical since each ACEC is designated to address different values and threats. The management protections identified by the commentor are not necessary for the protection of cultural resources. The management identified for each management area is designed specifically to protect the identified values.	Cultural Resources
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	Fish Creek We are especially concerned about the Fish Creek Cove rock art site. Our concern with this designation is its size. The wild and scenic river designation only covers .25 miles. This effectively constitutes public disclosure of a site location. BLM procedures require the following to take place prior to public disclosure of site location: Sites managed for public values must first have their information potential recovered through appropriate study guided by an approved research design to mitigate the impacts of visitor use and to provide information for interpretation. • Sites where scientific values are present, these values need to be protected or mitigated before the site is turned over to public use, including use related to SRP; • Provide sufficient supervision to protect both the public and the scientific values of these sites; •	The size of the eligible Fish Creek wild and scenic river segment is determined by the amount of BLM land in the area (40 acres isolated parcel). The language related to public disclosure of site location is from Appendix 5 of the Price Draft RMP/EIS, and does not reflect BLM policy for the Richfield Field Office. The Fish Creek Cove area was included in the potential Fremont Gorge/Cockscomb ACEC.	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
		Provide access to these sites for the identified public users; and • Prepare specific site management plans for sites in this category • Information from test/sampling excavations will be used to define the extent of the sites and to obtain information needed to interpret them. (Price RMP Appendix 5 Page 1) Our organization visited this site in early August of 2007 and noted extensive vandalism that had occurred within the previous few weeks. We reported this vandalism to the Richfield field office. This panel has experienced significant vandalism and demonstrates the BLM's failure to manage rock art of national significance (A3-17). We do not believe that .25 miles of river are sufficient for wild and scenic river designation and that this location be preserved for the values that it represents – a nationally significant archeological site. We believe that this site should be designated an ACEC.		
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	Development We are concerned with development near rock art sites including campgrounds, roads, OHV trails, oil and gas exploration and development which includes seismic testing, pipelines access roads, and mineral extraction. It is clear to us that the greater the number of people that have access to a site, the higher the probability that the site will be vandalized. Recent research (Spangler, Jerry: Site Condition and Vandalism Assessments of Archeological Sites, Lower and Middle Arch Canyon; Colorado Plateau Archaeological Alliance; 2006) confirms our experience.	The Draft RMP/EIS acknowledges that the illegal activities, such as vandalism and looting, may be impacted by changes in access, as is specifically identified in section 4.3.5. The Draft RMP/EIS does not include a detailed analysis of illegal activities. Enforcing the RMP decisions is an implementation-level action. Concerning the impacts from OHV leaving routes that are identified in an alternative, the Draft RMP/EIS analyzes the effects of the proposed actions, which does not include public land users driving off identified routes in areas that where OHV use is limited to identified routes.	Cultural Resources
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	We are concerned about the absence of a clearly stated intent to initiate Section 106 compliance prior to the designation of OHV routes and other development activities. Because roads provide access to site areas their impact is much greater than their narrow road corridor. The location of roads and OHV routes must give consideration both to the archeological resources directly in their path and the resources they provide access to. We believe it is essential that Class II or III cultural inventories be prepared in advance of recreational use or OHV designations. As a result we believe that the proliferation of OHV routes in the area needs to be carefully considered. Those that provide direct access to important archeological resource sites should be closed at least one quarter mile from sites eligible for NRHP status.	All the OHV Play Areas identified in the Proposed Plan have had a cultural clearance performed. There would be no impacts to cultural resources in these areas. The BLM will adhere to its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or	Cultural Resources

Commentor	Affiliation	Comment	Comment Summary Response	Category
			similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available.	
Troy Scotter troyscotter@comcast.net	Utah Rock Art Research Association	Dirty Devil We support the Wild and Scenic River designation for the Dirty Devil. We are unsure whether the Robber's Roost panels near the river are included in this designation. If not, they should be. The Robber's Roost panel demonstrates ceremonial elements with ties to Hopi rock art of Arizona. This is an area of mixed style images with figures demonstrating elements of Barrier Canyon and Fremont styles that may be helpful in understanding the transition from Barrier Canyon to Fremont cultures. (Geib; Glen Canyon Revisited)	The Draft RMP/EIS identifies specific management prescriptions within one-quarter mile of each side of the rivers identified as suitable. In addition, the area discussed within the comment is within the Dirty Devil WSA which provides management protection. The Robber's Roost pictograph panels next to the Dirty Devil River would therefore be included in the Wild and Scenic River designation.	Wild and Scenic Rivers
Tyler Kokjohn TKOKJO@midwestern.edu		as outlined on page 2-9 of section 2.4, although a description of the principles and benefits of adaptive management is provided, the draft RMP informs us that any adaptive management planning that actually does occur will be undertaken during the implementation phase at some indefinite time in the future. In addition, the draft plan provides no meaningful discussion of monitoring and assessment methods that would support all adaptive management efforts. Instead we discover that any future activity-level plans developed would follow NEPA guidelines and involve the public. Beginning with the Executive Summary (page ES-1) the writers of this document note that a new RMP is needed to respond to changing conditions and demands on resources emerging in the planning region. In section 2.2.2 (page 2-2) is the clear recognition of the charge to future BLM managers "…[the] RMP is strategic in nature, and, while it provides an overarching vision for managing resources in the planning area, it also allows management flexibility in light of changing priorities, information and circumstances." Consequently, the failure to include any adaptive management prescriptions is a serious oversight and is not in accord with planning requirements detailed by the BLM itself. The BLM Land Use Planning Handbook H-1601-1 (2005) is the source of policies applicable to this RMP development and examination of this document (page 32-33, section V. Monitoring, Evaluation and Adaptive Management) reveals that land use plans are required to establish intervals and standards for evaluations and assess effectiveness of the plan in the context of stated goals and objectives. Unless it is possible to stipulate that resources are insensitive to the potential problems and conditions identified within this draft document, these critical plan facets must be included. Without some sort of active information management component - clear delineation of required management responsibilities, data collection and evaluation protocols and accompanying timelines and some indication as to how activities will be evaluated - this plan seems destined to devolve into a collection of	Adaptive management is a formal, systematic, and rigorous approach to learning from the results of management actions, accommodating change, and improving management. It involves synthesizing existing knowledge, exploring alternative actions, and making explicit forecasts about their results. Management actions and monitoring programs are carefully designed to generate reliable feedback and clarify the reasons underlying results. Actions and objectives are then adjusted based on this feedback and improved understanding to continue to try to achieve the desired outcomes. In addition, decisions, actions, and results are carefully documented and communicated to others, so that knowledge gained through experience is passed on rather than lost when individuals move or leave the organization.	Process and Procedures

Commentor	Affiliation	Comment	Comment Summary Response	Category
		apparently randomly and sporadically performed actions from the day it is approved. Deferring this critical plan aspect to some unspecified time in the future puts resources at an unwarranted risk because, for example, delays in getting travel management plans operational might unintentionally foster continued or perhaps expanded resource damage. Waiting to devise adaptive management protocols in a future NEPA process almost guarantees years will elapse before anything happens. Also, given budget constraints, the possibility exits that actions delayed could well become actions never undertaken. Should that occur, the enormous effort expended putting together a new RMP was a futile waste of public resources if BLM simply reverts back to a "no action" alternative for management. Providing information regarding adaptive management prescriptions need not necessarily be burdensome. This is not a demand to provide explicit schedules and detailed instructions for each and every task, goal and objective, but a request that the plan provide managers (and the public) guidelines as to assessments frequencies, who will compile data, who will analyze that information, when conditions will be reviewed for success/failure to allow them to oversee these lands effectively as soon as the plan is approved. Unless this is done at this stage, limited agency staff will undoubtedly be confronted with competing demands on their time and will be left without a viable means to assess on-the-ground conditions and prioritize their efforts accordingly. An explicit prescription for adaptive management mechanics serving the RMP is vital for a plan that might well have a twenty year lifetime and be overseen by a number of different managers.		
Tyler Kokjohn TKOKJO@mid western.edu		Although it is clear that this plan is being developed to ensure the unique resources, vegetation and other critical intangible assets are preserved, the preferred alternative does not direct the BLM to fully protect all the wilderness quality lands harbored in the planning region and this is a serious oversight. For example, on page ES-10 of the executive summary it is noted that WSA lands must be managed so as to preserve their suitability for possible Congressional wilderness designation. That would mean these tracts are closed to or allow only limited OHV use, closed to oil or gas leasing, and managed as VRM class I. But the preferred alternatives do not follow even this explicit prescription for existing WSAs and leave additional wilderness quality lands at risk of degradation. Lands of such quality are a rapidly vanishing national resource and every effort should be extended to preserve them. In addition, such areas have a tangible economic benefit to the surrounding communities as well as providing for a permanent and wide range of multiple uses for the public.	FLPMA allows for continued OHV use on inventoried ways in WSAs during the WSA phase. The lands are closed to oil and gas leasing and would be managed as VRM Class I by policy.	Wilderness Study Areas
Val Hutchinson valhutchut@hot		Time after time the federal government closes public lands. As for the factory butte area, there is limited access to the area. only a couple of	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. San Rafael, Hondo Arch, and Hidden	Travel Management –

Commentor	Affiliation	Comment	Comment Summary Response	Category
mail.com		roads that will take you into the area. as you know the rest is inaccessible. I'm sure the BLM's intent is to turn it into a wilderness study area. The only problem with that is that know one at the BLM knows what anybody is studying, or who is doing the studying in these so called wilderness study areas. I for one enjoy traveling in the San Rafael and don't see a problem with consensus ATV riding. please keep the area open.	Splender area are not within the RFO.	OHV Area Categories
Virgil Ash virgil.ash@snow.edu		This comment regards possible land diposal units of SA 18B SA 19 and SA 20. These areas are basically land locked because they are surrounded by private property. However they have outstanding values for solitude, scenery, some cultural(indian chipping mounds), wildlife (Significant evidence of mountain lions, I have seen them, heard them, and seen many many tracks . These canyons are deep rocky canyons with small riparian environments in the bottom. I feel like I have taken a quick trip to zion national park when I go there. I recommend that instead of disposal that access easements be negotiated and then retained as BLM lands for public use.	In Table 2-18 of the Draft RMP-EIS, the last bullet of the desired outcomes identifies the initial criteria used to identify the parcels for sale. This bullet has been modified in the Final EIS to further clarify BLM's preliminary review process. Additional site-specific inventories would be completed in the NEPA analysis and decision-making process, at which time resources may be identified that would preclude disposal suitability.	Lands and Realty
Virgil Ash virgil.ash@snow.edu		Also some other Land disposal areas SA 06, 09, 11, 12, and 14 could be considered for trade with the state as they are contigent to and provide access to State DWR lands	FLPMA Section 203 requires that lands tentatively considered for disposal need to be identified in the RMP. However, this does not preclude consideration under other disposal authorities.	Lands and Realty
Virgil Ash virgil.ash@snow.edu		I believe the BLM S preferred alternative B is too restrictive to open areas. It would concentrate use to such small areas as to guarantee major impacts on those areas and the communities surrounding them.	The management suggested is included within the range of alternatives considered within the Draft RMP EIS.	Travel Management – OHV Area Categories
Wayne B. Peters suwa@suwa.org	SUWA	I see that you will try your best to protect the Utah Prairie Dog. Good, they need all the help they can get. Personally, I would put them on the "Endangered" list, not threaten. I also think you should stay at least one mile from their dens, not 1/2 mile. If I had my way I would not allow any poisoning of these little critters, let alone moving. Keep developments out of their area.	Neither BLM nor UDWR authorizes the poisoning of Utah prairie dogs. The decision to list the species as endangered rests with U.S. Fish and Wildlife Service (FWS) and is beyond the scope of this RMP. Buffers around Utah prairie dog complexes are being considered in a new recovery plan being prepared by FWS. BLM is committed to implement recovery plan decisions once they are finalized.	Special Status Species
Wayne B. Peters suwa@suwa.org	SUWA	I am also a little confused about what you printed on page 2-138 about Travel Management. You printed under Alt. C that access would be limited to 3,192 miles but under Alt. D would be limited to 3,735 miles. This seems strange to me.	The commentor is correct. There was an error on Page 2-138, Alternative D. The limited to designated route miles under this alternative was 3043, as identified on page 2-6, Alternative Comparison Summary and on Page 2-74 of the Travel Management Section.	Travel Management – OHV Route Identification
Wayne B. Peters suwa@suwa.org	SUWA	You print on page 4-295 that some roads to some trailheads might be closed. Could not these roads be cherry-picked so you could still use them?	Alternative D was developed to provide more protection to resources and therefore, route designations were developed for consistency with this alternative. Allowing use of these routes as open was analyzed within other alternatives.	Travel Management – OHV Route Identification
Wayne Barnes wayne_barnes@msn.com		I am writing this email to you because it is my right to have my opinion heard. I want you to know (BLM) that the motorized community cares what happens to the land around Factory Butte. And we will not stand by and allow it to be taken from us. For many years the motorized community has been told to go to Factory Butte and ride. Now we are	The management suggested is included within the range of alternatives considered within the Draft RMP EIS. San Rafael, Hondo Arch, and Hidden Splender area are not within the RFO.	Travel Management – OHV Area Categories

Commentor	Affiliation	Comment	Comment Summary Response	Category
		being told that we may not be able to ride there. I think this is wrong and should be left open to all who wish to ride there. I hope that my comments will be considered in the final plan and that this space is left open. Everyone that I ride with, where ever we happen to be, will always stop and pick up trash left by others if we find it. We are always courteous to others on the trail no matter what form of transportation they wish to use. We always stay on marked trails and encourage others to do the same.		
Wendy Hoff wendyhoff@hotmail.com		I live in Moab, Utah, yet spend a lot of time in the area covered by the Richfield Plan. I understand that people enjoy getting out on their ORV's, just like I enjoy hiking and camping. However, we're ruining in one generation lands that have existed for thousands of years. The noise, traffic, and trampling of plants disrupts wildlife and is creating a lifeless, barren desert. Once these areas are ripped to shreds, they're not coming back. My other concern is for those that are out enjoying the beauty and solitude of the Henry Mountains and Robber's Roost area. There are so few quiet areas left in this country, not to mention the unsurpassed beauty of this area. Not only does this land need PROTECTING for these reasons, but to allow ORV use completely ruins the experience of the hiker. Completely. To be out hiking in Dirty Devil country and to hear the drone of ORV use is, well, disappointing, more than disappointing, it ruins the hike. I would be in favor of a select few sacrificial areas for ORV's to use as they desire. But protect the rest. Especially don't allow use in roadless areas.	The PRMP/FEIS proposed alternative includes protective management prescriptions for both Wilderness Study Areas and non-WSAs with wilderness characteristics among other. Further, the BLM analyzed the impacts of travel management as outlined and described in Chapter 4 of the DRMP/DEIS. Congress recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. Also, specific decibel limitations on motorized vehicles are under the jurisdiction of the Environmental Protection Agency, and a matter of State Law. As stated in 43 CFR 8343.1(b): “No off-road vehicle equipped with a muffler cutout bypass, or similar device, or producing excessive noise exceeding Environmental Protection Agency standards, when established, may be operated on public lands.”	Travel Management – OHV Area Categories
William Davis		It has come to my attention that in revising the road map of the BLM ground to the west of Marysvale that in Section 25 there are several roads that cross private property that need to be removed from the map. 1. In Section 25 the road from PTSR0185 (Pine Creek) to PTSR0190 crosses my private property and is not public access to BLM ground. 2. In Section 25 road #PTSROI92 also crosses my private property and is not public access to BLM ground.	PTSR0185 to PTSR0190 - PTSR0185 is shown on our data as a County maintained route. The private property owner would need to address this issue with the County. PTSR0192 has been updated on the map to end the route at the BLM/private property boundary. In addition, PTSR0187 and PTSR0188 were wholly on private lands and have been removed from the BLM map.	Travel Management – OHV Area Categories
William Davis		In addition please note that PTRS0187 crosses private property and is not public access.	PTSR0187 and PTSR0188 are wholly on private lands and have been removed from the BLM maps.	Travel Management – OHV Route Identification
William Davis dyno6x12k@hotmail.com		It has come to my attention that in revising the road map of the BLM ground to the west of Marysvale that in Section 25 there are several roads that cross private property that need to be removed from the map. 1. In Section 25 the road from PTSR0185 (Pine Creek) to PTSR0190 crosses my private property and is not public access to BLM ground. 2. In Section 25 road #PTSR0192 also crosses my private property and is not public access to BLM ground.	PTSR0185 to PTSR0190 - PTSR0185 is shown on our data as a County maintained route. The private property owner would need to address this issue with the County. PTSR0192 has been updated on the map to end the route at the BLM/private property boundary. In addition, PTSR0187 and PTSR0188 were wholly on private lands and have been removed from the BLM map.	Travel Management – OHV Route Identification
William King	Utah Native	The Rainbow Hills just east of Glenwood, Utah are a very unique natural	This area was considered in the range of alternatives and is available for the	Areas of Critical

Commentor	Affiliation	Comment	Comment Summary Response	Category
	Plant Society	resource found nowhere else in Utah. This Arapien Shale outcropping contains gypsiferous and other substrates that are the habitat for six BLM Special Status Plants. They are the Utah Phacelia, Arapien Stickleaf, Wards Penstemon, Rainbow Rabbitbrush, Sigurd Townsendia and the Glenwood Milkvetch.	decisionmaker to consider in developing the Proposed RMP and ROD.	Environmental Concern
William Mahoney willm@ogenv.com		Section 4.6.1 p 4-476 You acknowledge the economic benefits of protecting lands with wilderness characteristics but you have selected a preferred alternative which places more value on mineral resource development and OHV use. I have hiked extensively in the area between the HenryMountainsand DirtyDevilRiver. I stay in local motels and buy at local businesses while doing so. If you chose to open more of this area to mineral resource development and OHV use, I will take my business elsewhere.	A range of alternatives was considered in the Draft RMP/EIS to manage areas with wilderness characteristics. This range of alternatives is consistent with FLPMA.	Non-WSA Lands with Wilderness Characteristics
William Mahoney willm@ogenv.com		Section 4.5.1 page 4-365 You acknowledge that motorized vehicle traffic within WSAs could impact wilderness characteristics, yet your preferred alternative allows this practice to continue. Thus, WSA protection is sacrificed for the benefit of the OHV interests. What about those of us who enjoy hiking in the area between the Henry Mountains and Dirty Devil Riverand value the area because of its unspoiled characteristics?	A range of alternatives considered a number of options for the inventoried ways in WSAs.	Wilderness Study Areas
William Prince	Dorsey & Whitney LLP	The Company has proposed the construction of a road route down Convulsion Canyon which may conflict with the Old Woman ACEC. However, the Company is unable to confirm the existence of a conflict between the Old Woman ACEC and the proposed Convulsion Canyon road route because the DRMP is unclear in identifying the exact location of the Old Woman ACEC and the scale of Maps 2-43 and 2-44 is too large to determine the exact location of the Old Woman ACEC.	The Quitchupah Creek road has been permited (Quitchupah Creek EIS, 2006) in an alignment that does not intersect the potential Old Woman Front ACEC.	Areas of Critical Environmental Concern
William Prince	Dorsey & Whitney LLP	The DRMP, under Section 3.5.3.2.12, describes the Quitchupah Potential ACEC ("Quitchupah ACEC"). The description of the Quitchupah ACEC incorrectly identifies the location of the Quitchupah Creek as western Sevier County. Ouitchupah Creek is actually located in eastern Sevier County and western Emery County.	The document has been edited to reflect proper location.	Areas of Critical Environmental Concern
William Prince	Dorsey & Whitney LLP	The DRMP, under Section 4.5.3.2.12, describes the proposed management program for the Ouitchupah ACEC under the various DRMP alternatives. Under all of the proposed alternatives, the management program for the Quitchupah ACEC limits surface disturbing activities within a specified distance from riparian areas. The DRMP does not describe how the proposed Quitchupah ACEC relates to and affects the proposed Quitchupah Creek Road as approved under the BLM Record of Decision dated March 9, 2006 and the Forest Service Record of Decision dated March 2006.	The Quitchupah Creek road has been permited (Quitchupah Creek EIS, 2006) in an alignment that does not intersect the potential Quitchupah ACEC.	Areas of Critical Environmental Concern
William Prince	Dorsey & Whitney LLP	A significant portion of the water flow in Quitchupah Creek is provided by pumping from the mine workings in the SUFCO Mine. Therefore, the current water flows for Quitchupah Creek are temporary and will	The BLM has identified relevant and important values as described in 43 CFR 1712(c)(3). The BLM ID Team was aware of the water conditions in Quitchupah Creek when it completed the ACEC evaluation.	Areas of Critical Environmental Concern

Commentor	Affiliation	Comment	Comment Summary Response	Category
		significantly decrease when the Company eventually ceases pumping water from the SUFCO Mine workings into Quitchupah Creek. The BLM should consider in its planning process that the current stream flows are principally man-made in Quitchupah Creek and the possibility of significantly decreased future stream flows.		
William Prince	Dorsey & Whitney LLP	The DRMP, under Section 3.4.6.1.4 and Map 3-12, identifies "Coal Resources with Development Potential and Existing Leases" within the Planning Area, but fails to identify Federal coal reserves located adjacent to the Skyline Mine and within the Planning Area in the east half of Township 13 South, Range 6 East and the east half of Township 14 South, Range 6 East.	The PRMP/FEIS Chapter 3 and Appendix 8 has been revised to acknowledges that the Flat Canyon Tract for the Skyline Mine is located on the Manti-LaSal National Forest and contains lands in Sanpete County (located in the west part of T. 13-14 S., R. 6 E.) with Federal coal reserves. Subsequently, with this new tract comes the potential for coal development not considered in the unsuitability reports.	Minerals and Energy – Leaseable
William Prince	Dorsey & Whitney LLP	The DRMP in Appendix 8 incorrectly describes the current ownership of the Company as Arch Coal Company (65%) and a subsidiary of the Itochu Corporation (35%). The Company is owned (>99%) by its parent, Arch Coal Inc.	Appendix 8 has been updated to reflect the information in the comment.	Minerals and Energy – Leaseable
William Prince	Dorsey & Whitney LLP	The DRMP, under Section 4.3.9 - Alternative "C", would designate Quitchupah Creek as a suitable Wild and Scenic River ("WSR)". As noted in Comment 3, the current water flows for Quitchupah Creek are temporary and will significantly decrease when the Company eventually ceases pumping water from the SUFCO Mine workings into Quitchupah Creek. The BLM should consider in its planning process that the current stream flows are principally manmade in Quitchupah Creek and the possibility of significantly decreased future stream flows.	Section 16(b) of the Wild and Scenic River Act defines a river as “a flowing body of water or estuary, or a section, portions, or tributary thereof, including rivers, streams, creeks, runs, rills, kills, and small lakes”. For the purposes of evaluation, the volume of water flow need only be sufficient to sustain or complement the identified resource values – Rivers with intermittent or non-perennial flows already exist within the National River system.	Wild and Scenic Rivers