

EXHIBIT 3

**SUWA ET AL. PROTEST
UT BLM 2-08 LEASE SALE**

**COMMENTS SUBMITTED BY SOUTHERN UTAH WILDERNESS ALLIANCE,
et al. FOR THE PRICE DRAFT RESOURCE MANAGEMENT PLAN**

I. Introduction

In Price, as in much of Utah, vast expanses of wilderness hinge on the BLM's decision of whether these magnificent places will be protected from two significant threats: oil and gas drilling and damage from off-road vehicle (ORV) use. Unfortunately, the two fatal flaws of the Price Draft Resource Management Plan (Draft RMP) are: 1) its failure to protect 98 percent of wilderness-quality lands outside of existing WSAs from oil and gas development; and 2) the lack of any meaningful ORV management.

An integral part of the BLM's charge of serving the public's interests involves giving full and fair consideration to conservation of our public lands, in addition to recreational and commercial uses. Under the Federal Land Policy and Management Act (FLPMA), the BLM is required to "prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values...." See, FLPMA §201(a); 43 U.S.C. § 1711(a). Further, FLPMA's multiple-use mandate requires the agency to consider the relative scarcity of the values involved and the availability of alternative sites for those values. See, FLPMA §202(c); 43 U.S.C. § 1712(c). This involves not only establishing principles for managing our public lands, but also a duty to recognize current and emerging values of the landscape. As part of that continuing inventory, the BLM is required to review wilderness characteristics and *account for those values* as it plans for the use of our public lands.

While the Draft RMP recognizes wilderness characteristics on nearly three times the acreage that falls within existing Wilderness Study Areas (WSAs), it neglects to consider any alternative that would provide meaningful protection of these identified wilderness characteristics. This is in direct violation of the National Environmental Policy Act's (NEPA) requirement to fully consider reasonable alternatives, and agency internal direction to consider alternative management options to protect these lands.

In addition to lacking a full range of alternatives, the Draft RMP even fails to accurately inform the public of the alternatives, as narrow as they are, that are under consideration.¹ As a result, the Draft document undermines public involvement in the RMP review and development process, and fails to solicit meaningful comment.

Because the BLM has failed to offer adequate draft alternatives for the Price Resource Management Plan, the Southern Utah Wilderness Alliance (SUWA) supports the Castle Country Heritage Plan (CCHP).² See Attachment A. The aim of this citizen-created

¹ SUWA provided a letter to the BLM explaining this point on September 16, 2004, and incorporates that letter herein. The concerns that SUWA raised in this letter were not remedied by BLM's on-line fact sheet, released on November 17, 2004 just 5 working days before the close of the comment period.

² In addition to supplying this information again within these comments, SUWA submitted the substantive information that forms the CCHP, including maps, throughout the scoping period and prior to the release of the Draft RMP.

proposal is to provide special attention to these remarkable wilderness landscapes by creating a balanced, sustainable recreation plan and by restricting extractive developments to proven areas. The CCHP solves user conflicts and ensures that environmental protections are appropriately applied, protecting wilderness quality lands while providing a balanced approach for ORVs and oil and gas development. SUWA expects the BLM to consider fully and to analyze the CCHP, in addition to the comments below, as part of the RMP revision process, and prior to release of the final RMP.

II. The Draft RMP Fails to Consider and Fully Analyze Alternatives that Adequately Address Wilderness, Oil and Gas Development, ORV Management, and Other Resources

In scoping comments submitted February 15, 2002, SUWA provided comments concerning a broad-spectrum of resource values that were, and remain, of deep concern -- since the Draft RMP has not adequately addressed such issues. SUWA reiterates and incorporates such comments herein. SUWA also takes this opportunity to emphasize the flaws apparent in the Draft RMP specific to wilderness, oil and gas development, ORV management, and other issues of concern.

A. Wilderness

The Price Field Office encompasses a stunning variety of wilderness lands deserving of official protection. Indeed, of the roughly 2.5 million acres of public lands managed by the BLM Price FO, approximately 1.5 million acres are proposed for wilderness designation in America's Redrock Wilderness Act (S. 639/H.R. 1796). Of these, BLM itself has determined that roughly 1,485,598 acres, or about 99% of citizen-proposed wilderness lands have, or are likely to have, wilderness characteristics.³ Unfortunately, the Draft Plan fails to provide any meaningful protection for the wilderness-quality lands that do not currently fall within the boundaries of existing WSAs. In other words, outside the existing WSAs, the BLM's preferred alternative leaves approximately 98% of the remaining 1 million acres of wilderness-quality lands open to oil and gas leasing and development and other harmful activities. The new Price RMP must provide real protection for these wild lands -- not continue to expose them to undue and unnecessary degradation and the permanent impairment caused by oil and gas activities, and irresponsible ORV use.

³ Since the initial, flawed wilderness inventory that resulted in a paltry half-million acres of WSAs in the BLM Price FO, according to its FLPMA mandates, BLM released the results of its 1999 Wilderness Inventory, finding and additional 483,121 acres of lands with wilderness characteristics (known as "wilderness inventory areas" or "WIAs"). Then, as part of this planning process, BLM has found that another 471,855 acres of lands within the Price FO are likely to contain wilderness characteristics (known as "reasonable probability determination areas" or "RPDs"). It must be noted that the Draft RMP's presentation of such figures contains an inaccuracy. The Draft RMP includes the Price River unit under the category "likely to have wilderness characteristics." See Draft RMP at Table 3-20, p. 3-39; and Map 3-27. However, BLM has now completed a more detailed inventory of the unit and determined that it *has* wilderness characteristics.

During the RMP scoping process and other public comment opportunities, SUWA submitted comments specific to the BLM wilderness inventory areas (WIAs)⁴ and the BLM reasonable probability determination areas (RPDs)⁵, as well as supplemental and new information regarding other tracks of wilderness-quality land for the BLM to consider within the RMP⁶. Unfortunately, the Draft RMP fails to incorporate adequately and to address the new information that SUWA has provided, and fails to provide meaningful protection for these lands. SUWA now incorporates its earlier comments, and submits additional supplemental and new information for the BLM to analyze fully and to consider during the RMP revision process and prior to the release of the Final RMP. See Attachment B Supplemental and New Information Forest Service/BLM Adjacent Wilderness Units; Attachment C, Supplemental and New Information Price River Wilderness Unit.

The Draft RMP fails to consider fully and to analyze the full spectrum of available management options that could provide protection of wilderness characteristics, as provided for by FLPMA and BLM instruction memoranda IM 2003-274 and IM 2003-275—Change 1. In order to comply with its multiple-use mandate and instruction memoranda, it is incumbent on the BLM to ensure protection of these identified wilderness resource values. With the increase in the number and type of outdoor recreationists that use public lands in Utah, it is increasingly difficult to find places where one can truly experience the natural environment and be unaffected by other recreationists. This is especially true for the Price resource area, because it is in close proximity to major population centers along the Wasatch Front. Many of the residents of these urban centers, as well as public land users from across the nation and international

⁴ In Appendix A of our February 15, 2002 scoping comments, we provided the BLM with supplemental and new information concerning the following FLPMA §202/Wilderness Inventory Areas (WIAs): Sids Mountain WIA, Mexican Mountain WIA, Desolation Canyon WIA, Turtle Canyon WIA, Jacks Canyon WIA, Upper Muddy Creek WIA, Devils Canyon WIA, Mussentuchit Badlands WIA, Cedar Mountain WIA, Muddy Creek - Crack Canyon WIA, Hondu Country WIA, Wild Horse Mesa WIA, San Rafael Reef WIA and Labyrinth Canyon WIA.

⁵ Within its July 18, 2001 comments concerning the San Rafael Route Designation Plan, SUWA submitted supplemental and new information concerning the following units to the BLM Price FO: Price River, Eagle Canyon, Molen Reef, Rock Canyon, Wild Horse Mesa, San Rafael River, Sweetwater Reef and Flat Tops. In Appendix B of our February 15, 2002 scoping comments, SUWA then provided supplemental and new information regarding the Lost Spring Wash wilderness unit. Further, on April 4, 2003, SUWA provided supplemental and new information regarding the San Rafael Knob wilderness unit. Thus far, the BLM has performed an initial evaluation of all but the San Rafael Knob unit, and has correctly determined that such units are likely to possess wilderness character. BLM must complete its evaluation with respect to the San Rafael Knob unit prior to completely the RMP process, and must incorporate this information into the Final Price RMP. In addition to its initial *evaluation*, the agency must also perform an intensive on-the-ground *inventory* of each of these units as part of the RMP revision process, and fully consider and analyze management options to protect the identified wilderness characteristics. See BLM IM-2003-274 and IM-2003-275. BLM has performed such an inventory for the Price River unit, and SUWA incorporates its response to that inventory herein at Attachment C for the agency to fully analyze and consider during the RMP revision process and prior to the release of the Final RMP.

⁶ SUWA's scoping comments identified tracks of land adjacent to Forest Service inventoried roadless areas that contained wilderness characteristics, and noted that the UWC would supply the BLM with additional information regarding such areas in the future. SUWA now provides the BLM with such information concerning Forest Service adjacent lands of wilderness character at Attachment B. The BLM must fully consider this information during the RMP process and prior to the release of the Final RMP.

tourists, seek out non-motorized, primitive recreation experiences in the lands managed by the Price Field Office. However, the Draft RMP fails to include an alternative that provides protection for these lands consistent with the recognized resource values and public desires. Rather, every alternative allows some degree of leasing, development, and motorized recreation within these areas, and protection from such actions essentially only exists within the existing WSAs . . . even under the “conservation” alternative C.⁷

Providing for balanced recreational opportunities is certainly one way of helping to ensure that naturalness, solitude, and primitive recreation are preserved on qualifying lands, and that the multiple-use mandate is respected. On November 14, 2003, SUWA provided the BLM with information and a map depicting a balanced, full-spectrum land management approach. Also, on March 25, 2004, SUWA submitted information regarding the recreational opportunity spectrum within the BLM Price FO for consideration during the RMP revision process.⁸ Unfortunately, the Draft RMP ignored this information, and failed to consider special recreation management areas that would reflect a balanced approach to recreational opportunities and other public land uses. Indeed, within the Draft RMP, almost all of the areas designated as “primitive” are limited to existing WSAs, and although some of the non-WSA lands identified as having or likely to have wilderness characteristics are included in the semi-primitive non-motorized areas, these areas are still mostly open to oil and gas leasing and none is closed to ORVs. The Castle Country Heritage Plan, however, provides a reasonable alternative that would ensure protection for the identified wilderness characteristics, while providing for a full-spectrum of multiple uses on the public lands managed by the BLM Price FO. See CCHP, Attachment A. SUWA supports this alternative and encourages the BLM to consider fully and to analyze it during the RMP revision process and prior to release of the final RMP.

B. Travel Plan Route Designations and ORV Management

Management of off-road vehicle use is *the most critical issue* facing the Price field office (PFO) today. It is undisputed that off-road vehicle (ORV) use on public lands managed by the PFO has exploded over the past 15-20 years. Indeed, the Draft RMP states “OHV use is perceived as the fastest growing activity in the PFO.” Draft RMP at 3-48.

Unfortunately, BLM’s land management plans did not anticipate such use and, therefore, the plans failed to provide adequate management for the dramatically increasing level of use (i.e. the sheer numbers) and the vast diversity in type of ORV use (i.e. dirt bikes, all-terrain vehicles, 4x4s, and rock-crawlers) on public lands. Thus, the explosion of ORV use coupled with inadequate management plans resulted in the current situation in which

⁷ Compare map 3-27 with Fluid Mineral Leasing maps 2-27 – 2-31; Areas Recommended for Withdrawal from Locatable Mineral Entry maps 2-32 – 2-36; Areas Closed to Mineral Disposal maps 2-37 – 2-41; Areas of Critical Environmental Concern maps 2-42 – 2-46; OHV Route Designations maps 2-54 – 2-56; and Recreation Opportunity Spectrum map 3-15.

⁸ SUWA hereby incorporates our November 14, 2003 and March 25, 2004 letters and attachments herein; see also Attachment A, Exhibit 1 and 2.

ATTACHMENT B

Supplemental New Information Concerning Forest Service/BLM Adjacent Wilderness Characteristic Areas:

Introduction: SUWA is pleased to submit supplemental and new information to the BLM concerning proposed wilderness areas for the agency to fully analyze and consider as part of the Resource Management Plan (RMP) revision process. The Federal Land Policy and Management Act (FLPMA) requires the Secretary of Interior to “prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values” (FLPMA §201), and to “develop, maintain, and, when appropriate, revise land use plans” (FLPMA §202). Further, as part of the RMP revision process, the agency must evaluate new information regarding wilderness characteristics, perform an intensive on-the-ground inventory of these areas, and fully consider and analyze management options to protect the identified wilderness characteristics in these units. *See* BLM IM-2003-274 and IM-2003-275. As discussed below, these proposed wilderness units contain wilderness characteristics not yet identified by BLM 1979 inventory records or by the San Rafael Resource Management Plan. Accordingly, the BLM must fully consider and analyze this new information within the environmental impact statement for the Price RMP revision.

Location: The following wilderness units are generally located west of Highway 10 and east and south of the Manti La Sal National Forest boundary:

- Trail Mountain (north of highway 29);
- Mahogany Point (south of Highway 29);
- South Horn Mountain (west of Castle Dale and northwest of Ferron consisting of two BLM areas only separated by a cherry-stem route that ends on the FS portion in Rock Canyon);
- Muddy Creek/Nelson Mountain (southwest of Ferron, west of Moore and northwest of Emery consisting of three BLM areas, two which area separated by a cherry-stem route that ends on the FS portion in Muddy Creek);
- Wildcat Knolls Extension (west of Emery and includes the majority of wilderness character lands within the area managed by the BLM Richfield FO).

See Exhibit 1, Map of SUWA’s proposed wilderness units. Wilderness character on each of these units extends between the Forest Service and BLM lands, separated only by an arbitrary political boundary. This boundary is not physical and does not detract from the units’ wilderness characteristics. Thus, together with the contiguous complimentary Forest Service lands, the wilderness characteristics of these lands must be fully analyzed and management protections must be established within the RMP.

Size: In compliance with section 2(c)(3) of the Wilderness Act, each of these BLM proposed wilderness character areas contain over 5,000 acres when combined with adjoining roadless Forest Service lands.¹

Naturalness: As described below in more specific detail, the Trail Canyon, Mahogany Point, South Horn Mountain, Muddy Creek/Nelson Mountain and Wildcat Knolls wilderness units all “generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable.” Wilderness Act, section 2(c) (1). The BLM has never fully evaluated the naturalness characteristics of these areas. *See* Exhibit 2, BLM 1979 Wilderness Records. Therefore, the agency must incorporate this new information into, and perform the necessary inventories and analyses during, the RMP revision process.

Affected Primarily by the Forces of Nature: Again, as described in more specific detail below, SUWA has inventoried, evaluated, and documented that each of these Forest Service adjacent BLM wilderness character areas are overwhelmingly natural and are affected primarily by the forces of nature. SUWA has excluded all significant human intrusions from each unit through boundaries or cherry-stems, including those the BLM mentioned in the 1979 inventory documents. *See* Exhibit 1; Exhibit 2. The few dated human intrusions that do exist, are now faded and are substantially unnoticeable in the unit as a whole, and do not impact the area’s naturalness. What remains are the several important riparian ecosystems that exist within the many canyons that branch across the units -- each a showcase of the natural forces that continue to shape the dramatic topography and influence plant and animal habitat types. The highly scenic views obtainable throughout these units are unblemished by human intrusions, and display the forces of nature.

Unit Descriptions/Impact Descriptions:

Trail Mountain: The proposed 16,680 acre Trail Mountain wilderness unit includes 480 acres of BLM managed lands and 16,280 acres of Forest Service land. The unit is located entirely within Emery County and is immediately west of the communities of Castle Dale and Orangeville. Bounded by main roads, the Trail Mountain wilderness unit does not contain significant impacts that detract from natural character. *See* Exhibit 1. While the BLM has never inventoried this area for wilderness character, it is contiguous to the Straight Canyon 4-415 Forest Service RARE II unit. Although much of the unit falls within Forest Service managed lands, the BLM portion’s wilderness characteristics – emphasized by Straight Canyon’s towering, scenic cliffs, and Cottonwood Creek – are worthy of management protections.

Mahogany Point: The proposed 20,000 acre Mahogany Point wilderness unit includes 2,000 acres of BLM managed lands and 18,000 acres of Forest Service roadless lands located in Emery County, immediately west of the communities of Castle Dale and Orangeville. The eastern portion of the unit located on BLM lands is drastically different

¹ Acreage figures listed below are rounded approximations.

than the western, Forest Service managed portion of the unit. The high, forested North Horn Mountain and The Cap that dominate the western lands, dramatically descend to the impressive and steep cliffs to the east. The arbitrary boundary between the Forest Service and BLM portions of the unit zig-zags along these towering, scenic cliffs.

BLM performed an initial evaluation within certain portions of this proposed wilderness area in the late 1970's. *See* Exhibit 2, UT-060-018, Buzzard and Cedar Benches. However, the boundaries that form SUWA's proposed Mahogany Point are drastically different than those used during the 1979 BLM inventory. *Compare* Exhibit 1 to Exhibit 2. Namely, SUWA excludes the powerline and radio tower, using these impacts as the boundary that separates the Mahogany Point and South Horn Mountain proposed units. Further, SUWA's unit excludes large, impacted areas on Buzzard Bench. Specifically:

- *BLM's 1979 Evaluation:* states that the north and east portions of the unit contain 14 miles of ways.

- *SUWA's current inventory:* BLM's 1979 inventory failed to provide detailed descriptions or a map depicting where such way were located. *See* Exhibit 2. Regardless, SUWA has excluded areas on Buzzard Bench and Cedar Bench that were impacted by ways. Therefore, routes in these areas are no longer within the unit, and do not affect the unit's wilderness characteristics. The Mahogany Point wilderness unit does contain two substantially unnoticeable routes that do not detract from the unit's naturalness.

- *BLM's 1979 Evaluation:* states that the unit contained five (5) stock reservoirs.

- *SUWA's current inventory:* – BLM's 1979 inventory failed to provide detailed descriptions or a map depicting the locations of such stock reservoirs. *See* Exhibit 2. It appears, however, that SUWA's Mahogany Point unit contains only one stock pond and its associated route, and both have naturally reclaimed and do not detract from the unit's naturalness.

- *BLM's 1979 Evaluation:* states that the area contained six (6) miles of fence.

- *SUWA's current inventory:* If such fencelines are still present within the adjusted boundaries of SUWA's Mahogany Point unit, they are insignificant features that do not affect the unit's naturalness. Regardless, fences do not disqualify an area from wilderness consideration.

- *BLM's 1979 Evaluation:* states that the area contained three (3) miles of powerline.

- *SUWA's current inventory:* SUWA has excluded this powerline from the proposed wilderness unit; it now forms the boundary between the Mahogany Point and South Horn Mountain units.

- *BLM's 1979 Evaluation*: states that the unit contained one (1) drill site.

- *SUWA's current inventory*: The BLM 1979 inventory failed to provide a description or map depicting the location of this well. However, SUWA's recent inventory disclosed two (2) drill locations. One is located on State section 16 outside of BLM lands, and the second has been excluded by a short cherry-stem. *See Exhibit 1.*

Therefore, SUWA's boundary adjustments have removed any significant impacts that may have been present within BLM's 1979 unit, while other, minor impacts are no longer substantially noticeable in the unit as a whole.

South Horn Mountain: The proposed 104,300 acre South Horn Mountain wilderness unit includes 12,300 acres of BLM managed lands, and 92,000 Forest Service lands. The BLM portion of the unit is located solely in Emery County, while the Forest Service portion contains lands in both Sevier and Emery Counties. The community of Ferron is located to the south and southeast of this large wilderness area. Several prominent land features are located within the BLM portions of the unit, including Diversion Hollow, Indian Hollow, Rock Canyon, Killpack Canyon, Paulson Wash and Cedar Bench – each a monument to the forces of nature, and free from human impacts.

The current proposed wilderness unit actually covers portions of two of BLM's initial inventory units. *See Exhibit 2, Buzzard and Cedar Benches, UT-060-018; Below South Horn Mountain, UT-060-017; compare with Exhibit 1.* Importantly, SUWA's South Horn Mountain unit combines the two BLM inventory areas on either side of Rock Canyon. While BLM initially utilized the route in Rock Canyon as a boundary between the units, SUWA's unit realizes that this route ends just beyond the Forest Service boundary. The Forest Service has identified these adjacent lands as the Bridlecome/Rock Canyon Rare II, 4-411 area. Because the wilderness characteristics present on the BLM lands extend deep into the Forest Service Roadless lands, the agency management boundary is not a physical impact defining the unit boundary. Therefore, the Rock Canyon route is more appropriately excluded from this larger unit with a cherry-stem. *See Exhibit 1.* Furthermore, SUWA's South Horn Mountain unit excludes certain impacts discussed in BLM's initial inventory. The following new information addresses the agency's initial concerns:

- *BLM's 1979 Evaluation*: stated that the north and east portions of the unit contained 14 miles of ways.

- *SUWA's current inventory*: BLM's 1979 inventory failed to provide detailed descriptions or a map depicting where such ways were located. *See Exhibit 2.* Regardless, SUWA has excluded areas on Buzzard Bench and Cedar Bench that were impacted by ways. Therefore, routes in these areas are no longer within the unit, and do not affect the unit's wilderness characteristics. The South Horn Mountain wilderness unit does contain two substantially unnoticeable routes that do not detract from the unit's naturalness.

- *BLM's 1979 Evaluation*: states that the unit contained five (5) stock reservoirs.

- *SUWA's current inventory*: – BLM's 1979 inventory failed to provide detailed descriptions or a map depicting the locations of such stock reservoirs. *See* Exhibit 2. It appears, however, that SUWA's South Horn Mountain unit contains only one stock pond and its associated route, and both have naturally reclaimed and do not detract from the unit's naturalness.

- *BLM's 1979 Evaluation*: states that the area contained six (6) miles of fence.

- *SUWA's current inventory*: If such fencelines are still present within the adjusted boundaries of SUWA's South Horn Mountain unit, they are insignificant features that do not affect the unit's naturalness. Regardless, fences do not disqualify an area from wilderness consideration.

- *BLM's 1979 Evaluation*: states that the area contained three (3) miles of powerline.

- *SUWA's current inventory*: SUWA has excluded this powerline from the proposed wilderness unit; it now forms the boundary between the Mahogany Point and South Horn Mountain units.

- *BLM's 1979 Evaluation*: states that the unit contained one (1) drill site.

- *SUWA's current inventory*: The BLM 1979 inventory failed to provide a description or map depicting the location of this well. However, SUWA's South Horn Mountain unit does not contain any drill site impacts. *See* Exhibit 1; 2.

Therefore, SUWA's boundary adjustments have removed any significant impacts that may have been present within BLM's 1979 unit, while other, minor impacts are no longer substantially noticeable in the unit as a whole.

Muddy Creek/Nelson Mountain: The proposed 84,000 acre Muddy Creek/Nelson Mountain wilderness unit includes 15,000 acres of BLM managed lands and 69,000 acres of Forest Service roadless lands located within Emery and Sevier Counties southwest of Ferron, west of Moore, and northwest of Emery. The wilderness unit joins three separate BLM areas through the larger, contiguous Forest Service RARE II, 4-423 area: a small area southwest of Millsite Reservoir and under Little Nelson Mountain; a segment south of Wash Rock Canyon; and a third larger area immediately west of Nelson Mountain and south of Youngs Peak. *See* Exhibit 1. This scenic, natural, and wild area forms the headwaters of the Muddy Creek. The multiple canyons, draws and ridges that are located within the BLM portions of this unit have retained their wilderness characteristics.

Although BLM's initial evaluation included much of this area, it failed to include and evaluate natural lands located northwest of Emery, and below Little Nelson Mountain.

See Exhibit 2, Below Youngs Point, UT-060-016. Therefore, two of the three separate BLM areas mentioned above have never been inventoried by the BLM. Both of these areas, however, contain no significant impacts and have retained their natural characteristics. Accordingly SUWA's information regarding these two areas is completely new and must be fully addressed.

BLM's initial inventory considered the third, larger area mentioned above, and determined that "much of the area retains its natural character." See Exhibit 2, Below Youngs Point. Despite this finding, BLM dismissed the area from further consideration. SUWA provides new information that addresses BLM's initial evaluation:

- *BLM's 1979 Evaluation:* states that one way (2 ½ miles) passes through the unit from east to west, cutting the unit in half.

- *SUWA's current inventory:* SUWA has excluded this route from the unit by cherry-stem. Further, considered in context with the unit as a whole, including the contiguous Forest Service lands, this route does not bisect the unit.

- *BLM's 1979 Evaluation:* states that three (3) stock reservoirs exist in the unit.

- *SUWA's current inventory:* BLM's evaluation fails to contain information describing the location of these reservoirs. SUWA has excluded certain areas from the wilderness unit that may have been reservoir sites. These include: T21S R6E, Section 24 SE; and T20S R7E, Section 28 SW. SUWA's proposed unit does not contain any such impacts that detract from the area's natural character.

- *BLM's 1979 Evaluation:* states that the unit contains three (3) fences that stretch four (4) miles.

- *SUWA's current inventory:* While fencelines may still be present within unit, they are insignificant features that do not affect the unit's naturalness. Regardless, fences do not disqualify an area from wilderness consideration.

- *BLM's 1979 Evaluation:* states that the unit contains one large old reservoir.

- *SUWA's current inventory:* BLM's evaluation fails to contain information describing the location of this reservoir. SUWA has excluded certain areas from the wilderness unit that may have been reservoir sites. These include a large reservoir at T20S R8E, Section 28 SW. This impact is not within the unit boundaries and therefore does not impact the naturalness of the unit today.

- *BLM's 1979 Evaluation:* states that the unit contained one oil and gas drill site.

- *SUWA's current inventory:* SUWA's inventory did not confirm the presence of this feature. However, if an old drill site is still within the unit's adjusted boundaries, it has obviously reclaimed and no longer detracts from the area's naturalness.

- *BLM's 1979 Evaluation:* states that the unit contained contour furrowing.

- *SUWA's current inventory:* No significant contour furrowing was located within SUWA's unit boundaries.

- *BLM's 1979 Evaluation:* states that the unit contained a gravel pit.

- *SUWA's current inventory:* BLM's initial evaluation failed to include information discussing the location of such gravel pit. Regardless, it does not appear to be located within SUWA's unit boundary.

Therefore, SUWA's boundary adjustments have removed any significant impacts that may have been present within BLM's 1979 unit, while other, minor impacts are no longer substantially noticeable in the unit as a whole.

Wildcat Knolls: The proposed 19,100 acre Wildcat Knolls wilderness unit includes 8,300 acres of BLM managed lands and 10,800 acres of Forest Service roadless lands that fall within Emery and Sevier Counties. The vast majority of the BLM portion of this unit is contained within lands managed by the Richfield FO. Therefore, SUWA will provide more detailed information to the Richfield FO. The Price FO should be concerned with the area just north of Link Canyon Wash. *See* Exhibit 1. Of course, the Price FO should coordinate with the Richfield FO when considering this unit during the Price RMP revision process.

Outstanding Opportunities for Solitude or Primitive Recreation: The Wilderness Act of 1964 Section 2(c)(2) states that an area must: "have outstanding opportunities for solitude *or* a primitive and unconfined type of recreation."

Outstanding Opportunities for Solitude: Each of the units discussed above provides outstanding opportunities for solitude within several winding and remote canyons. Spectacular views present at countless locations enhance the feeling of isolation. Further, the Forest Service portions of these units are densely vegetated and provide ample screening. BLM's 1979 evaluation of the areas' opportunities for solitude was flawed and limited, narrowly construing its assessment to avoid the contiguous Forest Service lands. *See* Exhibit 2 (stating, e.g. "since the unit averages little over 2 miles across E to W, the opportunities for solitude are not good"). Therefore, BLM must perform an updated, on-the-ground inventory to assess the opportunities for solitude within SUWA's unit as a whole.

Outstanding Primitive and Unconfined Type of Recreation: SUWA's field assessment of the opportunities for primitive recreation within these units revealed outstanding opportunities not previously identified by the BLM. For example, a visitor could take one of many short hikes to a prominent ridge, scramble up rocky outcrops, or stroll down a canyon bottom -- all the while enveloped by strong natural forces and a feeling of solitude. Other outstanding primitive recreational opportunities include

horseback riding, hunting, picnicking, camping, wildlife viewing, and photography. Each of these activities is enhanced by the area's diverse, rugged topography, dense vegetation, and highly scenic vistas. Further, these primitive experiences can be stretched over multiple days within the BLM portions of the units, and on the adjacent Forest Service roadless lands.

Supplemental Values: According to the Wilderness Act, a unit "may also contain" supplemental values. Thus, the BLM shall determine if a unit contains "... ecological, geological, or other features of scientific, educational, scenic or historical values." Although such values are not required for wilderness their presence, if any, should be documented. As mentioned above, these units contain several supplemental values that enhance their wilderness characteristics.

Conclusion: Therefore, these proposed wilderness units contain wilderness characteristics not yet identified by BLM 1979 inventory records or by the San Rafael Resource Management Plan. Accordingly, the BLM must fully consider and analyze this new information within the environmental impact statement for the Price RMP revision, and apply management options to protect the wilderness values present on these lands.