Comments of the Draft RMP/EIS by Resource

Table of Contents

AA – Adequacy and Analysis 3
ACE – Areas of Critical Environmental Concern 14
AQ – Air Quality 37
CUL – Cultural Resources 56
FIR – Fire Management 63
GRA – Livestock Grazing 67
LAR – Lands and Realty 85
MLO – Minerals and Energy—Locatable 96
MOG – Minerals and Energy—Oil and Gas 97
MSA – Minerals and Energy—Salable 113
OTH – Other 114
PRP – Process and Procedure 121
REC – Recreation 135
RIP – Riparian 155
SCO – Scope of Document 163
SD – Special Designation 166
SOC – Socioeconomics 167
SOL – Soils 183
SSS – Special Status Species 186
TRR – OHV Roads and Trails 208
TRV – Travel Management 223
VEG – Vegetation 258
VRM – Visual Resource Management 272

WC – Wilderness Characteristics 279
WD – Woodlands 325
WL – Wildlife 326
WR – Water Resources 351
WSA – Wilderness Study Areas 354
WSR – Wild and Scenic Rivers 362

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
National Park Service Intermountain Region	3	10	It is not clear whether the range of alternatives compared for mineral disposal includes the 101,720 acres of Glen Canyon NRA where the BLM has responsibility for mineral resources.	This acreage is identified in both the Mineral Potential Report (MPR) and the Reasonable Foreseeable Development Scenario (RFD). As explained on page 2-18 of the DRMP/EIS, "Management Common to All Alternatives", the NPS, as the surface management agency (SMA), manages surface resources under its jurisdiction. The BLM would attach lease stipulations required by the SMA.	No
State of Utah	4	28	The DEIS does not address consistency between neighboring jurisdictions' management objectives.	It was the intent in the development of the RMP/DEIS to be consistent with management objectives in the adjoining Moab BLM Planning Area where appropriate. This same intent was not necessarily applied to other neighboring jurisdictions. In some cases, the opportunity to develop consistency became apparent during scoping, comment periods and various interagency coordination meetings. Section 5.3 in the FEIS, (Consistency With Other Plans), addresses the consistency issue.	Yes
San Juan County	7	2	The BLM's interpretation of the Multiple Use mandate where all uses occur someplace but not together is flawed. Landscapes can be managed so that a broad spectrum of resource uses can create social, economic and ecological wealth simultaneously. Multiple use management results in benefits to various resources. For example, grazing can be a tool to benefit wildlife and their habitats.	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".	No
San Juan County	7	23	In the analysis of the impacts for the Draft RMP/EIS, almost all the impacts are attributable to OHV use, oil and gas use,	In the Draft RMP/EIS, surface disturbing activities are considered potential negative impacts to natural and cultural	No

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			and, to some extent, grazing. The underlying theme is that these 3 things are the cause of all negative impacts and if they are eliminated or controlled then everything else is taken care of. The BLM should consider cheat grass and juniper encroachment, invasive weed problems, and catastrophic fires. The BLM should utilize livestock to control invasive plants.	resources. On page A-1, surface disturbing activities are defined. Surface disturbing activities include, among many other things, oil and gas development and cross country OHV use. Neither grazing nor vehicle travel on vehicular routes are defined as surface disturbing activities. The BLM has addressed cheat grass, juniper encroachment, invasive weeds and catastrophic fires. On pg. 2-50 in decisions common to all action alternatives, the BLM specifies controlling and reducing invasive and noxious weed species. Vegetation treatments areas for pinyon-juniper area are identified on pg. 2-14. The PRMP/FEIS adopts the Utah Fire Plan, which seeks to prevent catastrophic fires. On an allotment basis, Standards for Rangeland Health and Guidelines for Grazing Management could be utilized to control invasive species on any given allotment.	
San Juan County	7	31	Pg. 2-14 - The Health and Safety section seems rather weak. Is abandoned mine lands the only health and safety concern in the Monticello Field Office?	The goal for the Health and Safety section states that the BLM would mange hazardous risks on public lands to protect the health and safety of public land users and stewards, protect natural and environmental resources, minimize future hazardous and related risks, costs and liabilities, and mitigate physical hazards in compliance with all applicable laws, regulations and policies. Statements were added under this section to include all physical hazards, hazardous materials and hazardous wastes for mitigation and management common to all alternatives.	Yes
San Juan County	7	39	The BLM should resolve inconsistencies in the Draft RMP/EIS. For instance on page 4-266, reference is made to "Section 3.10.4.2". However the County could find no Section 3.10.4.2. Likewise on page 4-267, reference is made to recreational trends in Section 3.10.4 but that section discusses paleontological resources.	These inconsistencies have been corrected in the PRMP.	Yes
San Juan	7	63	Pg. 4-561 - BLM refers to Section 4.3.19.2.6 but that section	The PRMP has been changed to correct this error. The	Yes

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
County			does not exist in the document.	sections referenced should be Sections 4.3.19.3.5, Impacts of Cultural Resource Decisions on Wildlife and Fisheries and 4.3.19.3.10, Impacts of Recreation Decisions on Wildlife and Fisheries.	
San Juan County	7	64	Pg. 4-593 - BLM refers to Section 4.3.19.2.15, Impacts of Habitat Fragmentation. That section is found at 4.3.19.3.19 on page 4-598.	The text of the PRMP has been corrected.	Yes
Blanding City-Webb	8	1	The commenters express several concerns and frustrations with the challenges of multiple-use management including the manner in which alternatives are formulated, impacts are analyzed, public involvement and the BLM's decision making process. (Comments common to letters from Blanding City Council and City Manager).	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. (SCO 3R). The Monticello RMP process was completed with the State of Utah and San Juan County as active cooperating agencies with the BLM. Chapter 5 describes the process used to encourage equal public participation and involvement including other agencies with expertise and jurisdiction by law. The BLM is obligated to follow applicable law and regulation, such as FLMPA. Unfortunately, the commenters did not provide specific data or direct BLM to information within the DEIS that was in fact an error.	No
Sierra Club Utah Chapter	17	6	Commenter takes pages to list what and how BLM should take a “hard look”. They include numerous regulations to which BLM must adhere.	The purpose of the DEIS and DRMP is to take a hard look at the current situation and BLM contends that a hard look was taken using all required laws and regulations. Most of what the commenter lists is being done by the BLM MFO.	No
Canyon Country Heritage Association	18	1	Commenter expresses concern about the amount of participation and weight given to San Juan County throughout the RMP process.	Cooperating agency status was extended to Federal, State, and local agencies, including San Juan County. They were a formal cooperating agency in the RMP revision process. In addition to the cooperating agencies, the BLM Monticello Field Office held meetings with and sought the input of other	No

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				agencies that have land management jurisdiction within or adjacent to the planning area.	
Blue Ribbon Coalition	24	4	Alternatives D and E present a false choice as they cannot be considered as viable, stand alone alternatives.	NEPA requires a Federal agency to consider a range of reasonable alternatives (40 C.F.R. §1502.14). 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. Under the land use planning process, the BLM must consider a range of alternatives for the lands identified 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.	No
Blue Ribbon Coalition	24	7	Unable to find any information regarding the Settings, Targeted Outcomes, Market and Benefits as described in Appendix E.	The tables in Appendix E, for Benefits Based Management give information on these terms.	No
Southern Utah Wilderness Alliance	26	7	The commenter states the range of alternatives does not provide protection of natural and cultural resources and is a fatal flaw to this plan.	The DEIS/RMP provides 5 alternatives that range from no action to an emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping.	No
Southern Utah Wilderness Alliance	26	8	The Draft RMP did not consider a more environmentally protective alternative consistent with FLPMA's requirement that BLM "minimize adverse impacts on natural, environmental, scientific, cultural, and other resources" and omitted the Redrock Heritage Proposal.	The Redrock Heritage Proposal was considered in the Draft RMP/EIS on pg. 2-151 as an alternative considered but eliminated from detailed analysis. Although, it was not a complete alternative, components of the plan were carried forward for analysis in all the action alternatives. Alt B and E were developed as environmentally protective alternatives with 582,360 acres closed to cross country travel and routes not designated.	No
Southern Utah Wilderness	26	89	The DRMP failed to analyze the impacts of climate change to the resources of the MFO, especially on the Colorado	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-	Yes

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Alliance			Plateau.	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 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 the PRMP/FEIS.	
Southern Utah Wilderness Alliance	26	95	The range of alternatives proposed shows a bias toward off-road motorized recreation and oil and gas development.	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.	No
Southern Utah Wilderness Alliance	26	102	The lack of variability among the proposed alternatives indicates that the draft RMP is predisposed to this industrial development.	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	No

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				consideration was given to all potential alternatives identified. 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.	
Southern Utah Wilderness Alliance	26	115	The DRMP/EIS does not give adequate consideration to National Park Service Lands. The National Park Service should have been a cooperating agency.	The BLM Planning Handbook (H-1601-1) defines a cooperating agency as one which has "jurisdiction by law "or "special expertise." Although the Park Service does not technically meet the definition of a cooperating agency, the BLM conducted coordination meetings with the Park Service during the development of the DRMP/EIS in order to solicit its concerns. The BLM met its NEPA requirements on consultation and coordination by meeting with the National Park Service and other federal, state and county agencies.	No
Southern Utah Wilderness Alliance	26	116	Management of BLM lands adjacent to NPS-lands should prioritize protection of the values for which the NPs units were created.	The BLM met its NEPA requirements on consultation and coordination by meeting with the National Park Service and other federal, state and county agencies. The BLM conducted many coordination meetings with the Park Service during the development of the DRMP/EIS in order to solicit its concerns. BLM is not required to create buffers around National Parks or manage BLM lands by NPS prescriptions.	No
Lynell Schalk	29	2	On page 4.624, Volume 2, there is a reference to the cumulative impacts on livestock and grazing from the "adjacent Ashley National Forest." I am not aware of any such national forest adjacent to the Monticello PA.	This error has been corrected in the FEIS.	Yes
Lynell Schalk	29	5	"The trade and service sector employees (sic) a large amount of people…" This should read "employs," not "employees." (Reference: pg. 3-107, Vol. 1, under "Shift in Regional Economic Activity," second paragraph).	This misspelling has been corrected in the FEIS.	Yes

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Lynell Schalk	29	13	The list of ID team members (Reference pg. H-70, Vol. 3) did not include a law enforcement representative, yet the DRMP addresses "protection" and "enforcement" including drawing conclusions about what levels of protection given areas and/or resources need. There are no charts showing levels of law enforcement incidents, either by area or resource. This data would have been particularly valuable in determining the need for extra protection for cultural areas, route designation, ACEC nominations, and various other resource impacts, etc.	Monticello's law enforcement officers did participate in ID Team meetings and provided expertise in travel planning, cultural resources, recreation uses, woodland harvest and other matters. The list of preparers has been changed in the FEIS to correct this omission. A report of law enforcement incidents is out of scope for this document but incidents were part of the knowledge base of the law enforcement officers.	Yes
IPAMS(Independent Petroleum Assc of Mountain State	55	4	Maps 23 -27, which identify areas to be leased with NSO stipulations, do not clearly delineate the NSO areas. For example, there are approximately 40,000 acres in Alkali Ridge, and 2,146 acres are designated as NSO. However, it is impossible to tell if the acreage is scattered throughout the Alkali Ridge area, or within a contained portion of it. Operators are unable to analyze the impacts of the DRMP without that information, and therefore, unable to comment on how that NSO stipulation affects their operations.	Maps have been corrected in the FEIS and Chapter 2 describes which special designation areas are subject to NSO.	Yes
CrownQuest	62	94	Appendix A sets forth stipulations applicable to oil and gas leases in Table A.1. Many of the stipulations set forth in Appendix A, however, are not identified as restrictions on leases in Chapter 2, Table 2.1. The BLM must resolve discrepancies between the stipulations identified in Appendix 2.1 and those identified in Table 2.1. To the extent the BLM attempts to impose stipulations that are not identified in Appendix 2.1, it must analyze the impacts of these stipulations on other resource values in Chapter 4.	Any discrepancies between Appendix A and Chapter 2 have been resolved in the PRMP/FEIS.	Yes
Susan Dexter	77	1	While the meaning of "cumulative Impacts" is accurately defined in at the beginning of Chapter 4, Section 4, the content of the section fails to adequately address them. Cumulative impacts are the "bottom line" of any comprehensive EIS. In this document, the discussion of cumulative impacts is superficial; no facts or data are cited to	The cumulative impact analysis combines impacts from past, present and reasonably foreseeable actions to the extent practical based on the nature and scope of the decisions being made. Past actions (from the current management plan) are reflected in the status of the resources in the	No

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			support the assertions presented. At the very least, the actual data on impacts which have occurred during the implementation of the current management plan should have been presented.	Affected Environment section.	
Pamela Baker	102	1	On page 2-30 at the top under Alternative C is there a "not" missing? Otherwise the message is contradictory. Same on page 2-40 under Alternative C at the bottom of the page.	The sentence on page 2-30 at the top under Alternative C has been changed for clarification. It now reads “Dispersed camping would be allowed in the Indian Creek Corridor, except within the following designated camping zones that have been established: Bridger Jack Mesa, Indian Creek Falls, and Creek Pasture. Camping within these zones is limited to designated sites”. Page 2-40 of the DEIS was incorrect as this prescription did not apply to the ACEC but to the SRMA.	Yes
Pamela Baker	102	2	On page 2-23 and 2-24 there are blank boxes under Alternative E. Should these all be "Same as Alternative B"?	These errors have been corrected in the FEIS. Alternative E should read "Same as Alternative B".	Yes
Adonia Ripple	148	1	Global climate change is one of the most serious challenges facing the world, yet the DRMP completely ignores climate change. The FRMP needs to thoroughly analyze the impacts of climate change on the planning area and the potential impacts of proposed activities on 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	Yes

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				PRMP/FEIS.	
Patrick Flynn	151	1	Global climate change is one of the most serious challenges facing the world yet the DRMP completely ignores climate change. The FRMP needs to thoroughly analyze the impacts of climate change on the planning area and the potential impacts of proposed activities on climate change.	Please refer to response to comment 148-1.	Yes
Warren Kesselring	155	1	Global climate change is one of the most serious challenges facing the world, yet the DRMP completely ignores climate change. The FRMP needs to thoroughly analyze the impact of climate change on the planning area and the potential impact of proposed activities on climate change.	Please refer to response to comment 148-1.	Yes
Mike Mellick	156	1	Global climate change is one of the most serious challenges facing the world, yet the DRMP completely ignores climate change. The FRMP needs to thoroughly analyze the impacts of climate change on the planning area and the potential impacts of proposed activities on climate change.	Please refer to response to comment 148-1.	Yes
Casey Yorkunas	158	1	Global climate change is one of the most serious challenges facing the world, yet the DRMP completely ignores climate change. The FRMP needs to thoroughly analyze the impacts of climate change on the planning area and the potential impacts of proposed activities on climate change.	Please refer to response to comment 148-1.	Yes
Glen Canyon Institute	222	1	The Secretary of the Interior, who oversees the BLM, considers global climate change so important that he has created a special Interior Department Climate Change Task Force to consider this pervasive issue. This action shows that even the Bush administration - which has actively weakened many environmental laws - cannot ignore the potential impacts of climate change. There is growing scientific evidence that climate change will have major impacts on the hydrology and ecosystems of the Monticello planning area and the entire West. For example, a February 2007 National Research Council report concludes that climate change is altering the hydrology of the Colorado	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	Yes

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			River Basin. This has been reiterated most recently in an article in Science magazine that identifies that considerable change will occur to the climate and hydrologic processes that impact the Colorado Plateau. Moreover, many activities proposed by the BLM, such as oil, gas, and mineral extraction, ORV use, and livestock grazing, emit greenhouse gases that promote climate change. Despite this, other than one oblique reference to fire (p. 4-11), the Monticello DRMP completely ignores climate change. This calls into question the entire basis of this plan, which is meant to provide management guidance for the next 20 years. Changes Needed in the Final Resource Management Plan 1. Significantly revise the DRMP to address climate change across all resource and management categories and on all levels. 2. Include a full analysis of the potential impacts of climate change on the natural resources of the planning area, including soils, precipitation and water flows, vegetation, wildlife and wildlife habitat, and aquatic communities. 3. Include a full analysis of the potential impacts on climate change of emissions of greenhouse gases resulting from current and potential consumptive activities such as oil and gas, coal, oil shale and tar sands, and mineral extraction; ORV use; and livestock grazing. 4. Evaluate changes in the hydrology of the Colorado River Basin resulting from global climate change, as identified in	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.	

AA – Adequacy and Analysis					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			the National Research Council report.		

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Environmental Protection Agency Region 8	1	6	EPA supports designation of Lockhart Basin as an ACEC to protect resource values from ongoing or potential impacts from surface disturbing activities. Such resources include visual, habitat of federally-listed wildlife species and cultural.	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. The BLM stands by its findings regarding areas proposed to be designated as ACECs.	No
Environmental Protection Agency Region 8	1	7	EPA supports increasing the size of Hovenweep ACEC but is concerned that this would result in changing the existing oil and gas leasing stipulation from NSO and TL/CSU to open with standard stipulations. This change in stipulations would likely negate the intended protection provided under the ACEC designation.	The 880 acre visual protective zone is NSO in the proposed plan. Cajon Pond would remain as TL. The remainder of the ACEC would be classified as Controlled Surface Use stipulations for oil and gas leasing. Under Alternatives B and C, the Hovenweep ACEC would be expanded 620+ acres from Alternative A, to a total of 2,418 acres. The management prescriptions under Alternatives B and C would be the same as Alternative A (the 620+ acre addition would be managed as the "General Area Exclusive of Special Emphasis Zones"). Table 2.1., pg. 2-39 will be revised to clarify the specific prescriptions that apply to the 620+ acre expansion. The total acreage shown on pg. 239 under Alternatives B and C for the Hovenweep ACEC should be 2,418 acres. BLM will correct the error.	Yes

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
				The existing BLM/NPS (1987) Cooperative Management Strategies will be added to the DRMP/DEIS references. This agreement defines VRM and NSO for visual zones.	
State of Utah	4	6	The BLM must explain the need for "special" management for the ACEC and explain how this management is not duplicative of other normal BLM management or protections afforded by other state or federal laws.	The special management for an ACEC is in reality a package of management protections applied to an area specifically to protect its relevant and important values. The BLM can only apply those protections that are within its authority.	No
San Juan County	7	20	The Draft RMP/EIS does not include a discussion on the nature or type of threat of "irreparable damage" or the regional significance of relevant and important values in its review. BLM misinterprets irreparable damage when reviewing and analyzing ACECs in the Draft RMP/EIS. The ACEC tool was intended by Congress to be limited to only those instances where irreparable damage would be caused without designation. Most surface disturbing actions can eventually be repaired. The BLM must explain the need for "special" management for the ACEC and explain how this management is not duplicative of other normal BLM management or protections afforded by other state or federal laws.	The ACEC evaluation appendix (Appendix H) was modified, and a section added discussing threats to the relevant and important ACEC values; however, whether the threats currently exist does not preclude a potential ACEC from being considered in the action alternatives. All nominated areas, where the BLM has determined to have relevant and important values, are identified as potential ACECs and are addressed in the action alternatives. Threats to relevant and important values are likely to vary by alternative. On August 27, 1980, the BLM promulgated final ACEC guidelines (45 Federal Register 57318) clarifying the term "protects" – "To defend or guard against damage or loss to the important environmental resources of a potential or designated ACEC. This includes damage that can be restored over time and that which is irreparable. With regard to a natural hazard, protect means to prevent the loss of life or injury to people, or loss or damage to property." Thus, BLM is to consider the potential for both reparable and irreparable damage when protecting important historic, cultural, or scenic values; fish and wildlife resources; or other natural systems through ACEC designation. This interpretation is consistent with FLPMA's legislative history and implementing policy. Section 2 of the guidelines clarifies that ACECs are special places within the public lands. It states: "In addition to	Yes

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				establishing in law such basic protective management policies that apply to all the public lands, Congress has said that 'management of national resource lands [public lands] is to include giving special attention to the protection of ACECs, for the purpose of ensuring that the most environmentally important and fragile lands will be given early attention and protection' (Senate Report 94-583, on FLPMA). Thus, the ACEC process is to be used to provide whatever special management is required to protect those environmental resources that are most important, i.e., those resources that make certain specific areas special places, endowed by nature or man with characteristics that set them apart. In addition, the ACEC process is to be used to protect human life and property from natural hazards."	
San Juan County	7	46	Pg. 2-34 - San Juan County feels that, with exception of the National Historic Landmark (2,146 acres), the Alkali Ridge ACEC does not meet the requirements necessary to qualify as an ACEC and that the area can be protected within the framework of current laws and regulations. The County urges BLM to not manage this area as an ACEC but choose Alternative D in the final RMP.	Please refer to response to comment 007-20.	No
San Juan County	7	48	Pg. 2-37 - The statement "Portions of the Cedar Mesa ACEC lie within 8 WSAs" under Management Common to All Alternatives should be clarified because according to all of the maps there are only 4 WSAs. San Juan County recommends that BLM avoid layering of protective designations.	A correction has been made in the document showing that 3 WSAs and 1 ISA lie within the Cedar Mesa ACEC. "Layering" is planning. Under FLPMA's multiple use mandate, 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, BLM doesn't 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,	Yes

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				objectives, and actions to the same area of public lands may be perceived as “layering”. 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. All uses and values cannot 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 can be considered together 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. 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. BLM’s Land Use Planning Handbook requires that specific decisions be made for each resource and 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.	
San Juan	7	50	Pg. 2-37 - Management prescriptions for the Cedar Mesa	The text of the PRMP has been changed to clarify the	Yes

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
County			ACEC under Alternative C are unclear. For instance the County cannot determine rather activities such as geophysical work, disposal of mineral materials, or mineral entry are available.	management prescriptions.	
National Trust for Historic Preservation	13	2	BLM should maintain existing ACEC designations for areas with significant values.	BLM recognizes several areas with significant cultural values and has given consideration for management and protection of these resources with special designations and/or management prescriptions	No
National Trust for Historic Preservation	13	3	BLM lacks the authority under FLPMA to eliminate an existing ACEC designation unless it finds that the area no longer meets the relevance and importance criteria.	FLPMA states that in the development and revision of land use plans, the Secretary shall give priority to the designation and protection of ACECs. Nothing in the Act can be construed to mean that once established, ACECs cannot be modified or eliminated. On the contrary, during revision of an RMP, the BLM must consider the appropriateness and effectiveness of its existing designations and associated management prescriptions and determine whether modification of these designations and prescriptions is necessary for proper management of resources. The 10 existing ACECs were all reconsidered in this light to determine whether the ACEC designation was still appropriate or whether another designation and associated management would be more appropriate. This reevaluation is documented in Appendix H.	No
Canyon Country Heritage Association	18	8	The commenter states that the Recapture drainage illegal trail is not mentioned as a conflict in the RMP. The area should be nominated as an ACEC.	The illegal trail in the Recapture drainage did not come to light until after scoping was done for the RMP revision. It is being handled separate from the RMP revision and is not part of the long term “management” of the MFO area but a currently ongoing trespass resolution. Its settlement is outside the scope of the RMP revision. No entity came forward nominating the area as an ACEC and it was not considered for ACEC designation by the RMP ID Team.	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Canyon Country Heritage Association	18	12	Commenter asks about the number of acres by alternative for ACEC designation. They allege collusion with SJC.	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection of ACECs. The BLM gave full consideration to the designation and preservation of ACECs during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period. A total of 16 ACEC nominations were received and the relevance and importance of each were determined. Fourteen 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 Alternative B. 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. See Appendix H for rationale. The allegation of collusion with San Juan County is unfounded. San Juan County was a cooperating agency in the RMP process. BLM feels that the range of alternatives reasonably covers options and they stand by their findings.	No
Spear	19	8	The commenter states that the Recapture drainage illegal trail is not mentioned as a conflict in the RMP. The area should be nominated as an ACEC.	The illegal trail in the Recapture drainage did not come to light until after scoping was done for the RMP revision. It is being handled separate from the RMP revision and is not part of the long term "management" of the MFO area but a currently	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				ongoing trespass resolution. Its settlement is outside the scope of the RMP revision. No entity came forward nominating the area as an ACEC.	
Spear	19	12	Commenter asks about the number of acres by alternative for ACEC designation. They allege collusion with SJC.	The numbers of acres of ACEC by alternative are provided in the PRMP/FEIS.	No
Southern Utah Wilderness Alliance	26	4	BLM is obligated to "give priority to the designation and protection of areas of critical environmental concern." "The proposed designation of only 2,530 acres of ACEC when 886,810 acres have been found eligible falls far short of FLPMA's mandate…"	A range of protection for ACECs varied across alternatives from 0 to 521,141 acres (page ES-6). The commenter includes numbers that are not found in the Monticello DRMP/EIS. BLM has given ACECs priority in at least two alternatives where BLM proposes ACEC designation for all lands that qualify as an ACEC.	No
Southern Utah Wilderness Alliance	26	78	BLM must prioritize requirement of ACEC in all alternatives.	The BLM gave priority to the consideration of ACEC management during the land use planning process. The BLM has given careful consideration to ACEC designation. 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 multiple use.	No
Southern Utah Wilderness Alliance	26	79	Threats from off-road vehicle use highlight the need to designate ACECs to protect special values.	The BLM gave priority to the consideration of ACEC management during the land use planning process. The BLM considered 35 ACEC nominations and found 14 to meet the criteria for ACEC designation. All 14 ACECs are proposed for designation in Alt B, 5 ACECs are proposed for designation in Alt C, and 0 ACECs are proposed for designation in Alt D. The BLM has given careful consideration to ACEC designation. 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	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				measures by other management actions. The management of ACECs is considered within the entire spectrum of multiple use.	
Southern Utah Wilderness Alliance	26	80	BLM has specifically failed to designate ACECs to protect lands with wilderness characteristics.	BLM Manual 1613 states "An ACEC designation will not be used as a substitute for wilderness suitability recommendations". The BLM does not have the authority to designate new WSAs under the land use planning process. Wilderness characteristics in and of its self is not a relevant and important value in determining ACEC nominations as defined in the ACEC manual at 1613.1.	No
Canyon Land Defenders	27	3	The ACEC proposals as explained under the alternatives, including the preferred action, make little sense. The ACEC evaluations found in Appendix H appears to be well thought out. However, little of the analysis is brought forward in the document. For example, the evaluation team recommended that Cedar Mesa continue as an ACEC under all alternatives because it meets the Relevance and Importance Criteria. The DRMP eliminates the ACEC in the preferred alternative without clearly explaining the rationale. The EIS analysis also doesn't clearly explain how the important factors that created the initial designation and were reaffirmed by the new evaluation, are protected under the proposed 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. Those ACEC nominations that were found to meet both the relevance and importance were included for special management as proposed ACECs in Alternative B.	No
Lynell Schalk	29	10	On pg. 3-127, Vol. 1, the total number of existing ACEC acres under the 1991 RMP is listed at 513,452. On pg. ES-6, Vol. 1, and again on pg. 2-4, Vol. 1, the total number of existing ACEC acreage is 488,616, a difference of 24,836 acres. Is there overlap in ACECs or is the agency unaware of exactly how much is already designated as ACECs?	This inconsistency has been corrected in the FEIS with the correct acreage figure.	Yes
Lynell Schalk	29	11	The DRMP states that "BLM policy and regulations require that priority be given to designation and protection of ACECs during land-use planning" (Reference: 1.3.1.5 Special	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (1613) requires that all potential ACECs be carried	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Designations, pg. 1-7, Vol. 1). If this is agency policy why has the DRMP gone from an existing 513,452 and/or 488,616 acres of currently designated ACECs to a dramatic drop of 76,764 acres in Alt. C, the Preferred Alternative? This is an 85 percent reduction -- at a time when the resources of the public lands are under increased pressure and impacts.	forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative B analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The analyses that will provide the rationale for the final decision to designate or not designate an ACEC can be found in Chapter 4 of the PRMP/FEIS.	
Lynell Schalk	29	29	Lavender Mesa ACEC: Since the mesa is inaccessible to motorized travel, why isn't it classified as closed to OHV use rather than as designated roads/trails? Under the other four alternatives, no reference is made to the area being closed to non-motorized/mechanized use such as mountain bikes. As this area is deemed to be an extremely sensitive area due to its relict vegetation, shouldn't mountain bikes and other wheeled vehicles be excluded?	Even though Lavender Mesa is inaccessible to motorized travel, the intent in Alternative D is to manage the area as the surrounding areas which are classified as designated roads/trails, even though other areas within this category are inaccessible to motorized vehicles. Since there are no designated roads/trails on the mesa, it is in effect a closed area. Section 4.3.8.9.2., Mechanized Recreational Travel states the MFO policy on mechanized use. Mechanized use would only be allowed on routes designated open for motorized use. The Lavender Mesa ACEC in the FEIS is closed to OHV use so it would also be closed to mechanized use.	No
Lynell Schalk	29	30	Lockhart Basin ACEC: No mention is made as to what the OHV/mechanized designation is for this area in Alternative B, C, D, or E (Reference: pg. 2-42, Vol. 1). Since no carryover prescriptions from Alternative A are noted, i.e. "Closed to OHV use," one has to assume there is no travel plan designation under any of the alternatives. Why is this?	Lockhart Basin would not be designated as an ACEC. This potential ACEC overlays the Indian Creek WSA and this section would be managed according to the IMP. The WSA is closed to motorized use in the travel plan. The remaining area of the potential ACEC would be limited for motorized and mechanized use to designated roads and trails. See Map #51 for OHV and Travel Plan Restrictions.	No
Lynell Schalk	29	32	Valley of the Gods ACEC: There is no mention of OHV and non-motorized/mechanical use prescriptions under Alternatives B, C, D, and E.	Under the proposed plan the Valley of the Gods would be designated as a Scenic ACEC. The Travel Plan will designate this area as limited to designated roads and trails. Motorized use and mechanized use would be restricted to designated roads and trails. Foot travel is allowed throughout the ACEC.	Yes

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Broads Healthy Lands	41	28	Pursuant to FLPMA §202,4 3 U.S.C.§ 1712(c)(3),BLM is mandated to give priority to the designation and protection of ACECs in developing and revising land use plans. It is alarming that the preferred alternative of the DRMP proposes to decrease the current number and size of ACECs in the preferred alternative. This is unacceptable. The following areas must not be "undesignated" as ACECs in the final RMP: Cedar Mesa Dark Canyon Bridger Jack Mesa Butler Wash Shay Canyon Scenic Highway Corridor	The BLM gave full consideration to designating and persevering ACECs during this land use planning process. The BLM evaluated 35 ACEC nominations and found 14 to meet the criteria for designation as an ACEC. All 14 ACECs are proposed for designation in Alternative B, 5 ACECs are proposed for designation in Alternative C, and 0 ACECs are proposed for designation in Alternative D. These alternatives analyze and disclose the impacts of the proposed ACEC management prescriptions and protections. 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. The BLM stands by its findings regarding areas proposed to be designated as ACECs.	No
Bluff Landowners Coalition	48	4	The BLM is dramatically and with seemingly no justification reducing the number of ACEC acreage from over a half million to a mere 76,000 acres. What is the justification for this?	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 16 ACEC nominations were received and the relevance and importance of each were determined. Those ACEC nominations that were found to meet the relevance and importance criteria were included for special management as proposed ACECs in Alternative B. The BLM Manual 1613.23 states that "After completing the analysis of the effects of each alternative, the manager	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
				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. The FLPMA further requires public lands to be managed under the principles of multiple use and sustained yield. This means that even though an area is determined to have relevance and importance as an ACEC, all other management options for the land are not automatically precluded. The BLM may choose to manage the lands in a manner that does not protect the relevant and important values identified during the ACEC review process, or that protect those values via management decisions that do not require an ACEC designation.	
Bluff Landowners Coalition	48	5	Cedar Mesa ACEC: Of particular concern is the proposed elimination of the Cedar Mesa ACEC. This area has spectacular scenic and cultural values. It is experiencing increased visitation and impacts. How can the agency justify the removal of its ACEC status in a time of increasing impacts? When it comes to sensitive resources, it should be one of your primary areas of environmental concern not one that is shunted aside. Its continuing WSA status is not sufficient as this only addresses the preservation of its naturalness, not its cultural resources. What is the real reason for eliminating this designation?	The BLM followed the ACEC designation process outlined in BLM Manual 1613 and analyzed the implications of designating or not designating areas as ACECs. In particular, Chapter 4 of the DRMP/DEIS analyzes the impacts of ongoing and future uses on the relevant and important values associated with potential ACECs under all alternatives. One of the guiding principles of this RMP revision was to eliminate excessive layering of special management designations and thereby help clarify which stipulations applied to specific areas. Since most of the impacts to cultural resources can come from site visitation, BLM felt it was more appropriate to manage the Cedar Mesa area as an	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
				SRMA. The SRMA management prescriptions list not only those applicable to visitation but also include other stipulations for use of other resources which came from the old ACEC stipulations. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The analysis that forms the basis of the rationale for the final decision to designate or not designate an ACEC can be found in Chapter 4 of the PRMP/FEIS.	
Bluff Landowners Coalition	48	6	Valley of the Gods ACEC: Why is this existing ACEC being reduced by nearly 10,000 acres (Alternative B and C)? It is a world class scenic area and should be provided additional protection, not less so (Reference: pg. 2-45, Vol. 1). There is also no mention of OHV and non-motorized/mechanized use prescriptions under Alternatives B, C, D, and E. Are mountain bikers and other nonmotorized wheeled vehicles allowed indiscriminate cross-country travel here?	Valley of the Gods was a special emphasis area with the Cedar Mesa ACEC and was never an ACEC in its own right under Alternative A. The Valley of the Gods ACEC boundary was made to be coincident with the Road Canyon WSA to avoid unnecessary overlap. Additionally, the area estimates for the 1991 RMP were made without the use of GIS, and may be inaccurate. OHV use is to be on designated roads and trails in Alternatives B, C, D and E. This has been clarified in the PRMP. Under the proposed plan the Valley of the Gods would be designated as a Scenic ACEC. The Travel Plan will designate this area as limited to designated roads and trails. Motorized use and mechanized use would be restricted to designated roads and trails. Foot travel is allowed throughout the ACEC. See Map 51 for the travel plan for this area. The WSA area not part of the ACEC under the proposed plan will be managed within the management prescription of the IMP. This area would not be open to motorized or mechanized use.	Yes

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
The Nature Conservancy	49	6	The existing ACEC status for Bridger jack Mesa is not retained in Alternative C, presumably because the ACEC is essentially the same as the Bridger Jack Mesa WSA. We would prefer to see this area (6,260 acres) retain its current designation as an ACEC with management as defined in Alternative B in the Final Monticello RMP, for the following reasons:	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative B analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). It is BLM's opinion that management under IMP along with continuation of no livestock grazing would protect the biotic resources of concern on the mesa. The analyses that will provide the rationale for the final decision to designate or not designate an ACEC can be found in Chapter 4 of the PRMP/FEIS.	No
The Nature Conservancy	49	7	The existing ACEC status for Bridger jack Mesa is not retained in Alternative C, presumably because the ACEC is essentially the same as the Bridger Jack Mesa WSA. We would prefer to see this area (6,260 acres) retain its current designation as an ACEC with management as defined in Alternative B in the Final Monticello RMP, for the following reasons: --The biotic resources are not only relevant and important, but also meet the identified needs in Utah's systems of natural areas, due to its relatively undisturbed stands of pinyon and juniper.	Please refer to response to comment 49-6.	No
The Nature Conservancy	49	8	The existing ACEC status for Bridger jack Mesa is not retained in Alternative C, presumably because the ACEC is essentially the same as the Bridger Jack Mesa WSA. We would prefer to see this area (6,260 acres) retain its current designation as an ACEC with management as defined in Alternative B in the Final Monticello RMP, for the following reasons:	Please refer to response to comment 49-6.	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			--Little-disturbed areas such as Bridger Jack Mesa are ideal locations for conducting research and monitoring. The past scarcity of human influence means that natural (versus altered) conditions and processes can be investigated. Further these sites are important to science as "benchmark" areas to compare with similar production-oriented lands nearby.		
The Nature Conservancy	49	9	The existing ACEC status for Bridger jack Mesa is not retained in Alternative C, presumably because the ACEC is essentially the same as the Bridger Jack Mesa WSA. We would prefer to see this area (6,260 acres) retain its current designation as an ACEC with management as defined in Alternative B in the Final Monticello RMP, for the following reasons: --While the Bridger Jack Mesa ACEC largely overlays the Bridger Jack Mesa WSA, we consider ACEC status to be justified apart from, or independent of, any future potential for Wilderness status for this WSA -- the purposes and uses of Wilderness/WSAs are not the same as those of ACECs. We believe that the needed management to abate threats to biotic resources in this area would be better accomplished (more finely-tailored) by ACEC status. Wilderness status could even be detrimental to certain biotic resources, if such status were to bring with it greatly increased publicity (i.e. guidebooks) with higher levels of foot travel certain to follow. Also, the fallback position of allowing current WSA status to provide the needed "protection" or management of Bridger Jack Mesa, and not continuing its ACEC designation, could lead to problems in the future. If the day ever comes when the interim status of WSAs is resolved by Congress (as designated Wilderness or not), and if the Bridger Jack Mesa	Please refer to response to comment 49-6 and add the following: In the event that the WSA status is dropped at some future date, a plan amendment would be used to determine management for the area, including management of sensitive resources on the mesa. The BLM has separate policies and guidelines, as well as criteria, for establishing ACECs and WSAs. These differing criteria make it possible that the same lands will qualify as both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies. The values protected by WSA management prescriptions do not necessarily protect those values found relevant and important in ACEC evaluation, and vice versa. The relevant and important values of ACECs within or adjacent to WSAs were noted in the ACEC Evaluation (Appendix H). The ACECs are evaluated and ranked based on the presence or absence of the stated relevant and important values. None of these values includes wilderness characteristics. Additionally, the management prescriptions for the ACECs are limited in scope to protect the relevant and important values, and the	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			WSA does not become Wilderness, then the Bridger Jack Mesa would lose the protective management status it needs.	BLM maintains that the size of the ACEC areas is appropriate for protection of the relevant and important values identified.	
The Nature Conservancy	49	10	San Juan River Potential ACEC: Designate and mange as provided under Alternative B (or C). This area largely corresponds with an area we identified in the Colorado Plateau ecoregional assessment as having importance for wildlife and riparian values and that the Utah Division of Wildlife Resources has identified as being rich in avian diversity. Further, the Bluff phacelia (Phacelia indecora) is found only in a few locations including alcoves along the San Juan River and Cottonwood Wash near Bluff.	The San Juan River (5,258 acres) would be designated as a Scenic, Cultural, Wildlife, and Natural Systems and Processes ACEC and would be managed with the following prescriptions: • Vehicle access, including OHVs/mechanized, limited to designated routes. • Unavailable for private and/or commercial use of woodland products except for limited on-site collection of dead wood for campfires; woodland use within the floodplain would be limited to collection of driftwood for campfires. • Available for livestock use October 1–May 31. . (Grazing must incorporate rest-rotation and/or deferred management systems. Riparian areas must meet or exceed PFC to the extent affected by grazing. • Available for watershed, range, wildlife habitat improvements and vegetation treatments. • West Montezuma Creek to Private land managed as VRM Class II. • West of accreted land at Town of Bluff to River mile 9 managed as VRM Class III. • River mile 9 to river mile 23 (above Mexican Hat formation) managed as VRM Class I. • River mile 23.8 to river mile 28 managed as VRM Class III. • River mile 28 to Glen Canyon NRA managed as VRM Class I. • Available for oil and gas leasing subject to NSO. • Unavailable for mineral material disposal.	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
				• Recommended for withdrawal from locatable mineral entry. • Managed to limit recreation use if wildlife values are being adversely impacted. • Camping closed in areas as necessary to protect cultural, wildlife, and natural processes. • Designated access trails to cultural sites as necessary to protect cultural resources. • No camping in cultural sites. Ropes and other climbing aids not allowed for access to ruins, cultural sites, and nesting raptors. The lower section of the San Juan River (river mile 28 to Glen Canyon NRA at river mile 45) is being recommended for inclusion into the Wild and Scenic river system as a wild segment. The segment has been removed from the ACEC.	
The Nature Conservancy	49	11	Dark Canyon Potential ACEC: Designate and manage as provided under Alternative B. A portion of this area overlaps with areas identified in our Colorado Plateau ecoregional assessment as important for conservation of Desert bighorn sheep and special-status animals and plants, including Mexican spotted owl (Strix occidentalis lucida), Alcove rock daisy (Perityle specuicola), and Kachina daisy (Erigeron kachinensis).	The BLM gave full consideration to designating and persevering ACEC during this land use planning process. The BLM evaluated 16 ACEC nominations and found 13 to meet the criteria for designation as an ACEC. All 3 ACECs are proposed for designation in Alternative B, 7 ACECs are proposed for designation in Alternative C, and 0 ACECs are proposed for designation in Alternative D. These alternatives analyze and disclose the impacts of the proposed ACEC management prescriptions and protections. 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	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				management of ACECs is considered within the entire spectrum of BLM's multiple-use mandate.	
Tom Ratcliff	56	4	At various locations in the document I find outstanding descriptions of areas which are environmentally sensitive for various reasons. I read where 13 of those areas "qualified" by meeting certain selection criteria. Yet at the description of Alternative C, BLM preferred, you chose to include only 7 of those; it is unclear if those will be added to the 10 that exist in Alternative A; are you seriously planning to reduce the number of ACECs you manage? Summary Table D, page 2-4 seems to reflect that. Further, we'd like to see some rationale for those areas not brought forward and for deleting any areas that you plan not to manage as ACECs.	The relevant and important values for which existing ACECs were established in the San Juan Resource Area RMP are analyzed in detail. In the NOI to prepare the (FO) RMP/EIS (Federal Register, Vol. 68, No. 107, June 4, 2003, Notice of Intent, Environmental Impact Statement, Monticello FO Resource Management Plan, Utah), BLM identified the 10 existing ACECs created in the San Juan Resource Area RMP in 1991. The NOI explained BLM's intention to bring these ACECs forward into the (FO) RMP/EIS. A scoping report was prepared in July 2004 to summarize the public and agency comments received in response to the NOI. The few comments received on the ACECs were supportive of their continued management as ACECs. The ACEC Manual (BLM Manual 1613) states: "Normally, the relevance and importance of resource or hazards associated with an existing ACEC are reevaluated only when new information or changed circumstances or the results of monitoring establish a need." There has been no change in information or circumstances regarding these areas. These existing ACECs were identified in Appendix H of the DRMP/DEIS, and the relevant and important values are listed. The existing ACECs are discussed within the array of alternatives. All of the ACECs would retain the ACECs designation in the No Action Alternative. Some of them would not retain the ACECs designation in the other alternatives considered. How the implementation of each alternative would affect the relevant and important ACECs values is analyzed and disclosed under each Alternative, including whether the values are at risk of harm by proposed management decisions.	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative B analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The analyses that will provide the rationale for the final decision to designate or not designate an ACEC can be found in Chapter 4 of the PRMP/FEIS.	
EOG Resources	60	24	Valley of the Gods Area of Critical Environmental Concern EOG strongly objects to the BLM's proposal under Alternative B, C, and E to designate the Valley of the Gods ACEC. See Monticello DRMP/EIS, pg. 2-45, Table 2.1. In particular, EOG objects to the proposal to prohibit mineral leasing within the ACEC and designate the area as Visual Resource Management Class I. The BLM has not demonstrated this stringent management is necessary to protect the resources within the proposed ACEC.	Appendix H of the DRMP/EIS details the relevant and important values identified for the potential ACECs included in the alternatives. These values provide the justification for restricting uses.	No
Owen Severance	103	1	The "Scenic Highway Corridor" ACEC was designated in the 1991 RMP. It was improperly dropped from the draft RMP without cause. Appendix H-31 gives the reasons for dropping this ACEC: No significant cultural resources. This statement is not true. I have seen numerous significant cultural resources in the part of the ACEC outside of the Cedar Mesa ACEC. The BLM has not surveyed this area, so it is premature to claim that the proposed ACEC "does not include cultural sites that could be considered relevant.	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. The BLM stands by its findings regarding the Scenic Highway Corridor.	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			No scenic qualities. This claim is especially egregious. I am enclosing part of the U-95 Corridor Study which was the basis for the ACEC nomination. People from the BLM State Office, Moab District Office, National Park Service, Utah State Planning Office, Utah Department of Transportation, Utah Division of State Lands, Utah Department of Natural Resources, Utah Division of State History, Utah Division of Travel Development, Utah Department of Community Affairs, and a representative from San Juan County all agreed to the importance of the scenic values. Part of their conclusions read: "U-95 and associated highways present a unique network of scenic roads within a vast recreational and wilderness complex. Recognition of the visual resource values in the management, use, and/or development of the lands and resources along the road network corridors and within the area is critical to the preservation of the area and integrity of the natural landscape will require some mechanism to unify the varied and sometimes conflicting interests toward common management goals." These are the reasons that the ACEC was established. Does not have "more than locally significant qualities. This is another egregious statement. Highway U-95 was designated Utah's Bicentennial Highway and has also been designated a "Scenic Byway" by the State of Utah. In addition, the highways in the ACEC lead to Natural Bridges National Monument, Glen Canyon National Recreation Area, the Grand Gulch Primitive Area, and numerous Wilderness Study Areas.		
Veronica Egan	131	6	How can the agency justify the removal of the ACEC status for Cedar Mesa in a time of increasing impacts? What is the real reason for eliminating this designation?	The BLM followed the ACEC designation process outlined in BLM Manual 1613 and analyzed the implications of designating or not designating areas as ACECs. In particular,	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
				Chapter 4 of the DRMP/DEIS analyzes the impacts of ongoing and future uses on the relevant and important values associated with potential ACECs under all alternatives. One of the guiding principles of this RMP revision was to eliminate excessive layering of special management designations and thereby help clarify which stipulations applied to specific areas. Since most of the impacts to cultural resources can come from site visitation, BLM felt it was more appropriate to manage the Cedar Mesa area as an SRMA. The SRMA management prescriptions list not only those applicable to visitation but also include other stipulations for use of other resources which came from the old ACEC stipulations. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The analysis that forms the basis of the rationale for the final decision to designate or not designate an ACEC can be found in Chapter 4 of the PRMP/FEIS.	
Veronica Egan	131	7	Why is the Valley of the Gods ACEC being reduced by nearly 10,000 acres? There is no mention of OHV and non-motorized/mechanized use prescriptions under Alternatives B, C, D, and E. Are mountain bikes and OHVs allowed indiscriminate cross-country travel here?	Valley of the Gods was a special emphasis area with the Cedar Mesa ACEC and was never an ACEC in its own right under Alternative A. The Valley of the Gods ACEC boundary was made to be coincident with the Road Canyon WSA to avoid unnecessary overlap. Additionally, the area estimates for the 1991 RMP were made without the use of GIS, and may be inaccurate. Under the proposed plan the Valley of the Gods would be designated as a Scenic ACEC. The Travel Plan will designate this area as limited to designated roads and trails. Motorized use and mechanized use would be restricted to designated roads and trails. Foot travel is allowed throughout the ACEC. See Map 51 for the travel plan for this area.	No
Nature	214	2	Bridger Jack Mesa	Please refer to response to comments 49-6 and 49-9.	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Conservancy Moab Project Office			The existing ACEC status for Bridger Jack Mesa is not retained in Alternative C, presumably because the ACEC is essentially the same as the Bridger Jack Mesa WSA. We would prefer to see this area (6,260 acres) retain its current designation as an ACEC with management as defined in Alternative B in the Final Monticello RMP, for the following reasons: 1. The biotic resources are not only relevant and important, but also meet the identified needs in Utah's system of natural areas, due to is relatively undisturbed stands on pinyon and juniper. 2. Little-disturbed areas such as Bridger Jack Mesa are ideal locations for conducting research and monitoring. The pas scarcity of human influence means that natural (versus altered) conditions and processes can be investigated. Further these sites are important to science as "benchmark" areas to compare with similar production-oriented lands nearby. 3. While the Bridger Jack Mesa ACEC largely overlays the Bridger Jack Mesa WSA, we consider ACEC status to be justified apart from, or independent of, and future potential for Wilderness status for this WSA - the purposes and uses of Wilderness/WSAs are not the same as those of ACECs. We believe that the needed management to abate threats to biotic resources in this area would be better accomplished (more finely-tailored) by ACEC status. Wilderness status could even be detrimental to certain biotic resources, if such status were to bring with it greatly increased publicity (i.e.		

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			guidebooks) with higher levels of foot travel certain to follow. Also, the fallback position of allowing current WSA status to provide the needed "protection" or management of Bridger Jack Mesa, and not continuing its ACEC designation, could lead to problems in the future. If the day ever comes when the interim status of WSAs is resolved by Congress (as designated Wilderness or not), and if the Bridger Jack Mesa WSA does not become Wilderness, then the Bridger Jack Mesa would lose the protective management status it needs.		
Glen Canyon Institute	222	5	The Area of Critical Environmental Concern (ACEC) land classification is designed to "protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, another natural systems or processes." (p. 2-34). The BLM has identified 12 areas, totaling 521,141 acres, as eligible for ACEC designation (p. 2-4, 2-34 to 2-45, and 4-416, H-2 to H-66). The DRMP would designate just 3 small ACECs, totaling 76,764 acres-an 84 percent reduction from the current plan (p. 2-4, 4-416). IN addition, 4 complete areas (Canyonlands, Monument Canyon, Redrock Plateau, and White Canyon) and 1 partial area (San Juan River) totaling 661,598 acres that were nominated by SUWA, but rejected (p. H-2), are given no protection under the DRMP. These areas are adjacent to Glen Canyon NRA, other national park areas, WSAs, eligible Wild and Scenic Rivers, and other lands with important natural, cultural, and recreational values and their management has a direct impact on those adjacent lands. Changes Needed in the Final Resource Management Plan 1. Designate all 12 areas identified as potential Areas of Critical Environmental Concern in Appendix H (p. H-2 to H-66). The analysis in this appendix provides strong	Please refer to response to comment 48-4.	No

ACE – Areas of Critical Environmental Concern					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			justification for the designation of these areas as ACECs.		

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Environmental Protection Agency Region 8	1	1	Several references in 4.3.1.2 refer to projected air pollutant concentrations as being well below National Ambient Air Quality Standards. The commenter found projected concentrations in Table 3-8 of the Draft Analysis of Management Situation (AMS) but not in the Draft RMP/EIS. The DRMP/EIS does not describe in detail the methods used to calculate the projected concentrations. EPA recommends that BLM disclose this information in the Final RMP/EIS.	The methods used to calculate the projected concentrations of pollutants are included in the PRMP/FEIS. The BLM analyzed potential impacts by a qualitative emissions-based approach. BLM estimated potential emissions from BLM activities within the planning area. The State of Utah provided emissions from permitted sources.	Yes
Environmental Protection Agency Region 8	1	2	The air quality analysis omits potential impacts to ozone, visibility and deposition. The planning area encompasses and is near class I National Park Service airsheds. Ozone is of particular concern because of the potential emissions of volatile organic compounds and oxides of nitrogen from sources in the area including oil and gas development.	Analyses of impacts on ozone, visibility, and deposition are included in Chapter 4 of the PRMP/FEIS. Please see updated descriptions of current ozone concentrations, visibility and atmospheric deposition in chapter 3, Section 3.1.2, 3.1.4, and 3.1.5.	Yes
Environmental Protection Agency Region 8	1	3	The RMP makes general estimates of air quality impacts due to various activities but does not describe nor calculate the projected concentrations for any of the alternatives. EPA recommends that BLM disclose projected NAAQS and visibility pollutant concentrations in the FEIS. EPA recommends that the FEIS contain wording from the Rawlins BLM DRMP/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."	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 a project-specific EIS associated with a proposed project. Please see chapter 4 Air Quality for the added text.	Yes
Environmental Protection Agency Region 8	1	11	Table 3-2 of the DRMP/EIS Ambient Air Quality Data for Monticello contains summary data from 2002. The most recent data (2006) should be used.	The FEIS presents the most recent monitoring data available.	No
Environmental Protection	1	12	Figure 3.3 of the DRMP/EIS presents visibility trend data through 1997. Data through 2005 are now available and	Data has been added to Chapter 3 giving visibility in Canyonlands National Park from 1990 through 2004.	Yes

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Agency Region 8			should be used in the FEIS.		
Environmental Protection Agency Region 8	1	13	Table 3.4 of the DRMP/EIS presents an emission inventory for the Monticello area for 2002. More current data should be incorporated as well as including drill rig emissions, mobile sources, construction sources, etc.	Comment noted.	No
Environmental Protection Agency Region 8	1	14	Page 4-10 of the DRMP/EIS refers to projected concentrations not being compared to PSD Class I and Class II increments. Where applicable, BLM should disclose impacts to the environment including providing PSD increment analysis.	BLM would consider comparing potential concentrations to applicable PSD increments for a project-specific EIS associated with a proposed project, if the EIS applied a quantitative dispersion modeling approach.	No
Environmental Protection Agency Region 8	1	15	Section 4.3.1.1 of the DRMP/EIS should also include reference to Utah Division of Air Quality (DAQ) regulation UAC R307-401, Permit: New and Modified Sources.	Comment noted.	No
Environmental Protection Agency Region 8	1	16	Section 4.3.1.2.1.1 includes sources of emissions from various oil and gas activities but it is unclear how drill rig emission sources were included or treated in the emission inventory. The FEIS should reference the more current emission estimates from the UT DAQ's most recent Annual Report (2005). It is also not clear how these existing emission sources are interpreted. BLM should disclose this information in the FEIS.	This section (methodology and emission estimates) was rewritten using AP-42 methodology.	Yes
Environmental Protection Agency Region 8	1	17	The AMS Table 3-4 and Figure 3-3 should be updated with more current data.	Section has been updated with more recent data.	Yes
Environmental Protection Agency Region 8	1	19	BLM should address the potential for wind events that entrain dust from Mancos shale landscapes that cause highway closures and accidents and the BLM's plans to mitigate these impacts. BLM should add more specific information on the role or increased OHV use in potential air	The Mancos shale formation in the Monticello Filed Office is intermixed with other soils and not a major component of the resource area and would be hard to manage specifically for the shale component.	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			quality impacts.		
National Park Service Intermountain Region	3	1	The region is close to the current National Ambient Air Quality Standards (NAAQS) for ozone and there is a possibility that EPA may lower standards so, 1) a more complete understanding of how additional sources of nitrogen oxides like oil and gas equipment might contribute to increased concentrations of ozone is needed, and 2) a more rigorous analysis of ozone using a grid-based photochemical air quality model is needed.	BLM recognizes that high ozone concentrations have been measured in Canyonlands National Park (see Table 3.2). BLM is in discussion with WESTAR and its member State and federal agencies on regional ozone analyses in the western States. The State of Utah was the first State in favor of these studies.	No
National Park Service Intermountain Region	3	2	It is unclear in Section 4.3 whether best available control technology (BACT) for nitrogen oxides (NOx) will be a requirement in future leases.	BACT guidelines are determined by the State of Utah, Department of Air Quality (DAQ). BLM would follow guidelines issued by DAQ.	No
National Park Service Intermountain Region	3	3	The EIS refers to projected future emissions from oil and gas sources; these estimates are omitted from the EIS but should be included.	Estimated emissions from BLM activities within the Monticello Planning Area have been added to Chapter 4.	Yes
National Park Service Intermountain Region	3	4	An air quality model that could adequately assess more regional sources of secondary nitrate pollutants is needed for a better understanding of the impacts of potential new wells because drilling and producing natural gas falls below the permitting thresholds for the State of Utah and thus would not be assessed for impacts on Class I air quality at the time of construction.	BLM would consider dispersion modeling for a project-specific EIS associated with a proposed project. Emission sources for an oil & gas proposal would likely include drill rig engines, compressors and others.	No
State of Utah	4	13	The state suggests initiating a coordinated approach to assessing and protecting air quality in Utah by working with federal, state, tribal and local agencies to identify and address air quality concerns.	BLM recognizes the great value of working with our stakeholders, and looks forward to working with the State of Utah as well as federal, tribal and local agencies.	No
State of Utah	4	14	The state encourages BLM to request oil and gas operators apply best available control technology (BACT).	The application of BACT for oil & gas development has been added to the mitigation section in Chapter 4.	Yes
State of Utah	4	15	The state encourages BLM to adopt emission standards for compressor engines consistent with the Draft Four Corners	The BLM does not have the responsibility to set air emission standards. That responsibility lies with EPA and the State of	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Air Quality Task Force Report and impose those standards as lease conditions and conditions of approval for all new APDs.	Utah. The BLM can only approve actions that meet the National Ambient Air Quality Standards as set by EPA or the State. Site specific mitigation or conditions of approval may be applied at the APD or implementation phase but not during land use planning and leasing.	
State of Utah	4	16	Future air quality analysis should include modeling with the following factors: 1) oil and gas proponents should assume that leasing and exploration will result in full field development, 2) air quality analyses should be cumulative and include not only planned development but existing omission sources, 3) air quality analyses should be based on anticipated worst-case meteorological conditions for each dispersion scenario, 4) air quality analyses should address compliance/attainment with all applicable air quality-related requirements and standards, and 5) air quality analysis should specifically address impacts to sensitive visual resources and other air quality-related values.	1.BLM would model the proposed action 2.potential impacts would include direct and indirect impacts from the project, as well as cumulative impacts from RFD, as required by NEPA 3. BLM would use reasonable-but-conservative assumptions rather than worst-case assumptions, as required by CEQ regulations 4. BLM would compare potential impacts to applicable NAAQS, and PSD increments, as appropriate 5. BLM would compare potential impacts to applicable visibility and atmospheric deposition levels-of-concern, as appropriate.	No
State of Utah	4	41	The air quality analysis assumed all new compressors would operate at a NOx emission rate of 0.7 g/hp-hr (pg. 4-17). How will the BLM ensure this projection for newly permitted compressors?	This figure (0.7 g/hp-hr) was used as an analysis assumption and is based on the best available control technology. Air quality impacts would be analyzed for specific proposed oil and gas development on a case by case basis during the NEPA process. Air quality emission restrictions can be imposed at that time.	No
State of Utah	4	42	It appears that the air quality related analysis assumes all compressors used in natural gas development will be gas-fired. Please clarify how BLM will require utilization of compressor technology consistent with this assumption.	BLM assumed the use of gas-fired compressor for the purpose of the air resources analyses for the RMP. BLM would probably not prescribe a particular mitigation measure, such as gas-fired compressor. Rather, BLM would consider requiring the project proponent to demonstrate that potential direct impacts would be less than levels-of-concern, as set by BLM.	No
State of Utah	4	43	The section entitled Impacts of Mineral Decisions on Air Quality under Alternative A discusses emissions from	Please see revised air resources section in Chapter 4. BLM would consider using a quantitative approach to estimate	Yes

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			multiple sources and notes that emissions from each source are well below applicable NAAQS. BLM relies on this statement as basis for each alternative, noting that impacts would be the same or similar to Alternative A. It is unclear how BLM equates additional emissions to anticipated ambient conditions.	potential concentrations for a project-specific EIS associated with a proposed project.	
Ute Mountain Ute Tribe	6	9	Tribal members' health could be compromised by air pollution related to uranium and oil and gas development. The White Mesa community is surrounded by BLM lands identified as having moderate potential for uranium development as well as oil and gas development potential. The FEIS needs to more carefully consider the potential impacts to air quality and human health from mineral development.	The analysis related to air quality has been updated in the PRMP/FEIS.	Yes
San Juan County	7	66	Air quality baseline should be established based on average case scenarios as opposed to worse case scenarios. Air quality monitoring stations should be installed using best available control technology. San Juan County should be involved in any air quality analysis for quality assurance purposes.	BLM analyses are designed to estimate reasonable-but-conservative potential impacts, in accordance with CEQ regulations. BLM recognizes the great value of our stakeholders and looks forward to working with San Juan County.	No
National Parks Conservation Association	44	1	The RMP ignores data from the Canyonlands National Park IMPROVE particle monitor. Table 3.2 sites only the ozone data from this monitor but ignores PM2.5, PM 10, sulfate, nitrate, organics, and elemental carbon. The BLM needs to re-evaluate its findings utilizing existing air quality data and make meaningful analysis of current and future conditions.	These data have been added to Table 3.2 in Chapter 3 of the RMP/FEIS.	Yes
National Parks Conservation Association	44	5	The cumulative impacts analysis on air quality fails to adequately address the threats from increased energy development in the area. The Four Corners region is seeing an explosion in oil and gas developments along with proposed coal fired power plants. There are also three new proposed coal fired power plants across the border in Nevada. Additionally, the surrounding BLM regions of	BLM has added oil and gas development to the list of activities that contribute to cumulative impacts. Please see section 4.3.24.1.	Yes

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Kanab, Moab and Richfield are releasing new resource management plans. Implementation of the Monticello 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.		
IPAMS(Independent Petroleum Assc of Mountain State	55	6	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 regulated 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, thought the Interior Board of Land Appeals (IBLA) has recognized that the state department of environmental quality, not the BLM, has authority over air emissions. Wyoming Outdoor Council, et al., IBLA No. 2006-155, 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.	We agree that the BLM does not have regulatory authority over air quality or emissions under the Clean Air Act. The State of Utah has primacy for compliance with the CAA. Permitted activities must meet air quality standards set by the State or the Environmental Protection Agency. The BLM and its permittees are subject to compliance with air quality standards.	No
EOG Resources	60	10	See Monticello DRMP/EIS, pg. 2-7, Table 2.1. The BLM must significantly revise these proposed management actions because they violate the Clean Air Act (CAA and potentially unreasonably limit 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 CAA. 42 U.S.C. 7401 et seq. Under the express terms of the CAA, the EPA has the	Please refer to response to comment 55-6.	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			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 in states such as Wyoming and Utah, the Department of Environmental Quality, not the BLM has authority over air emissions. The BLM does not have authority to regulate emissions in Utah. The BLM must eliminate or revise the proposed management action.		
EOG Resources	60	11	Under the CAA, the regulation of potential impacts to visibility and authority over air quality in general, rests with the UDEQ. 42 U.S.C. 7407(a) (2006), The goal of preventing impairment of visibility in Class I areas will be achieved through the regional haze state implementation plans (SIPs) that are being developed. 42 U.S.C. 7491(a)(2)(J). Although federal land managers with jurisdiction over Class I areas may participate in the development of regional haze SIPs, the BLM has no such jurisdiction in Utah. 42 U.S.C. 7491(2006). Accordingly, the BLM has no authority over air quality and cannot impose emissions restrictions, either directly or indirectly, on natural gas operations in Utah, particularly if the overall goal is to reduce potential visibility impacts.	Please refer to response to comment 55-6.	No
EOG Resources	60	42	On page 4-10, the BLM assumes that "regulatory [Prevention of Significant Deterioration] increment consumption analyses are the responsibility of the state air quality agency (under Environmental Protection Agency [EPA] supervision) and would be conducted where appropriate during the permit process" (emphasis added). Monticello DRMP/EIS, pg. 4-10. The BLM should revise this sentence to clarify that Prevention of Significant Deterioration (PSD) analyses would occur during the process for air emission permits to be	This sentence has been revised to make clear that UDEQ permits for air emissions would be obtained.	Yes

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			obtained from the UDEQ, and not during the process for APDs that are obtained from the BLM/ As the BLM correctly observes on page 4-10, the UDEQ, and not the BLM, has the sole authority to conduct PSD analyses.		
EOG Resources	60	43	See Monticello DRMP/EIS, pgs.. 4-14, 4-17,4-16. As the BLM is aware, the EPA revised the 24 hour NAAQS standard for PM to lower it from 65 ug/m. 71 Fed. Reg. 61144 (Oct. 17, 2006). The new 24 hour PM became effective on December 18, 2006 but states will not actually be required to meet the new 24 hour NAAQS for PM until April 2015, with possible extensions until April 2020. The BLM correctly references the revised standard elsewhere in the Monticello DRMP/EIS. See Monticello DRMP/EIS, pg 3-6, Table 3.2. The BLM should correct the references in Chapter 4 to reflect the new standard to demonstrate that the management prescriptions proposed in the Monticello MP/EIS will not jeopardize compliance with the more conservative standard.	The PRMP/FEIS has been corrected in Chapter 4 on air quality to reflect the new NAAQS standard.	Yes
EOG Resources	60	47	The BLM must revise its statement on page 4-86 so that it is consistent with its authority under the CAA. The BLM cannot attempt to limit air emissions through its normal management responsibilities. The State of Utah, with oversight from the EPA, has primacy over air quality issues in Utah. Rather than attempting to regulate air quality or air emissions, the BLM should defer to the expertise of the proper regulatory authority, the UDEQ, and presume that air quality in the air will meet the applicable standards, or that UDEQ will take appropriate action to ensure that its air quality standards are met.	Please refer to response to comment 55-6.	No
CrownQuest	62	12	On page 2-7 of the Monticello DRMP/EIS the BLM proposes the following management actions common to all alternatives: "The best air quality control technology, recommended by the Utah Division of Air Quality (UDAQ), would be applied as needed to meet air quality	Please refer to response to comment 55-6.	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			standards….BLM would manage emissions to prevent deterioration to air quality in Class I Airsheds." See Monticello DRMP/EIS, pg 2-7, Table 2.1		
CrownQuest	62	13	The BLM does not have any direct authority over air quality or air emissions under the 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).	Please refer to response to comment 55-6.	No
CrownQuest	62	14	The BLM has no authority over air quality and cannot impose emissions restrictions, wither directly or indirectly, on natural gas operations in Utah, particularly if the overall goal is to reduce potential visibility impacts.	Please refer to response to comment 55-6.	No
CrownQuest	62	15	Furthermore, the very act of authorizing the activity does not cause a predetermined level of emissions. Various control strategies can be employed to eliminate or reduce oil and gas related emissions.	The BLM does not have the responsibility to set air emission standards. That responsibility lies with EPA and the State of Utah. The BLM can only approve actions that meet the National Ambient Air Quality Standards as set by EPA or the State. Site specific mitigation or conditions of approval may be applied at the APD or implementation phase but not during land use planning and leasing.	No
CrownQuest	62	76	The BLM's air quality analysis contains several statements suggesting that it may attempt to regulate air quality emissions in the Monticello RA. On page 4-10, the BLM assumes that "regulatory [Prevention of Significant Deterioration] increment consumption analyses are the responsibility of the state air quality agency (under Environmental Protection Agency [EPA] supervision) and would be conducted where appropriate during the permit process. Prevention of Significant Deterioration (PSD) analyses would occur during the process for air emission permits to be obtained from the UDEQ, and not during the process for APDs that are obtained from the BLM. As the	Please refer to response to comment 55-6.	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			BLM correctly observes on page 4-10, the UDEQ, and not the BLM, has sole authority to conduct PSD analyses.		
CrownQuest	62	77	The BLM also misunderstands the nature of oil and gas emissions. Emissions from oil and gas operations are not simply a matter of the number of wells in a particular area. Rather, emissions are extraordinarily complex and depend upon a number of factors including the technology employed, engineering practices, and the particular characteristics of the development area. Operators are often able to reduce emissions to meet specific standards through engineering and site-specific practices. By potentially imposing a limit, the BLM not only is interfering with the UDEQ's regulatory authority but is ignoring the technical realities of air quality and air emissions.	Please refer to response to comment 62-15.	No
CrownQuest	62	78	When analyzing potential impacts to air quality, the BLM states that the 24-hour National Ambient Air Quality Standard (NAAQS) for PM emissions is 65 ug/m. See Monticello DRMP/EIS, pgs. 4-14, 4-17, 4-16. As the BLM is aware, the EPA revised the 24-hour NAAQS standard for PM to lower it from 65 ug/m to 35 ug/m. 71 Fed. Reg. 61144 (Oct. 17, 2006). The new 24-hour PM became effective on December 18, 2006 but states will not actually be required to meet the new 24-hour NAAQS for PM until April 2015, with possible extensions until April 2020. The BLM correctly references the revised standard elsewhere in the Monticello DRPM/EIS. See Monticello DRMP/EIS, pg. 3-6, Table 3.2. The BLM should correct the references in Chapter 4 to reflect the new standard to demonstrate that the management prescriptions proposed in the Monticello RMP/EIS will not jeopardize compliance with the more conservative standard. Additionally, the BLM should maintain consistency throughout the document.	Please refer to response to comment 60-43.	Yes
Megan Williams	76	1	This DEIS/RMP does not adequately analyze the air quality impacts that could occur as a result of the actions authorized	Please refer to response to comment 76-19	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			under the Monticello RMP, therefore, failing to comply with the National Environmental Policy Act (NEPA) and the Federal Land Policy Management Act (FLPMA). The air emissions estimates and "semi0qyantitiave" analysis included in the DEIS/RMP are not an acceptable replacement for a comprehensive quantitative assessment of the environmental and public health impacts resulting from an increase in air pollution in an area already heavily impacted by the adverse effects of increasing development. Without such an analysis, the BLM cannot say what the impacts of the activities analyzed in the DEIS/RMP will be on air quality and human health or whether the BLM will prevent significant deterioration in air quality, as required by the Clean Air Act.		
Megan Williams	76	2	The preferred alternative C does not satisfy the BLM's responsibility to ensure no significant environmental impacts and to provide for compliance with the Clean Air Act. Even alternatives B and E, which are the most protective of the environment, are not adequate because they do not fully disclose the air quality impacts of the planned growth. The BLM must put forth and alternative that ensures no significant impacts and full compliance with the Clean Air Act. This would include one that fully assesses the impacts on visibility in the affected Class I areas, one that prevents significant deterioration of air quality in the planning area and affected Class I areas and ensures no violations of the national ambient air quality standards (NAAQS) for ozone and particulate matter.	Please refer to response to comment 76-19	No
Megan Williams	76	3	The Federal Land Policy and Management Act (FLPMA) mandates that, "In the development and revision of land use plans, the Secretary shall … (8) provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards or implementation plans…" at U.S.C 1712(c)(8); See also 43	Please refer to response to comment 76-19.	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			CFR 2920.7(b)(3) (requiring the same for land use authorizations). In order to meet its obligation under FLMPA 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 Monticello area.		
Megan Williams	76	4	The BLM has not evaluated the air quality impacts in the Monticello areas as described in the Land Use Planning Handbook because it did not fully evaluate the direct, indirect and cumulative impacts fro the proposed alternatives. Without a full evaluation the public cannot know the predicted air pollutant concentrations throughout the affected area and, therefore, cannot be assured that there will be no significant impacts to human health and the environment. The draft EIS/RMP should specify predicted concentrations (not just qualitative comparisons as summarized in Table 4.8) 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).	Please refer to response to comment 76-19.	No
Megan Williams	76	5	The MPA encompasses an area of frequent drought. These conditions can be expected to contribute to particulate matter exposure and visibility impacts in the area. In addition, the area is seeing ozone concentrations that threaten to exceed the 8-hour ozone NAAQS. For the BLM to present alternatives for the MPA that allow significant growth in the emissions that contribute to these existing air quality concerns is extremely shortsighted when one considers the impacts of these air pollutants to human health and the environment. These issues must be dealt with in this resource management plan by ensuring overall air quality compliance throughout the affected areas.	BLM does not have control over drought related particulate emissions. PM emissions related to oil and gas development will be recalculated using AP-42 methodology and compared to existing emissions in Grand and San Juan Counties. The BLM will follow the air quality regulations required by the Department Air Quality, State of Utah.	Yes
Megan Williams	76	6	The BLM has an obligation, under NEPA, to evaluate all potential health effects from exposure to increased pollution	The EPA sets the NAAQS to be protective of the most vulnerable citizens (infants, elderly, and people with asthma).	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			under the various alternatives of this DEIS/RMP. The fact that the EPA has set the PM 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.		
Megan Williams	76	7	The BLM is proposing to allow NO emissions and VOC emissions in the planning area to increase by allowing an additional 195 oil and gas wells. See Table 4.1 of the DEIS/RMP. These wells along with the associated compressors and dehydrators include numerous sources of NO ad VOC emissions (e.g. from drill rig engines, well completions, compressor engines, heaters (separator, dehydrator and water tank), dehydrators, flares, leaking well heads and pipes, etc.) These emission sources must be identified and the various emissions quantified. Even considering the fact that we don't know the resultant impacts that could occur as a result of this increase in emissions without completing a dispersion modeling analysis, any increase in emissions of zone is almost certain to threaten the area's compliance with the current and future ozone standard.	Please refer to response to comment s 76-13 and 76-12.	No
Megan Williams	76	8	The BLM must establish strict and enforceable mitigation measures that essentially do not allow for any growth in NO and COV emissions in the area in order to protect human health and to avoid violations of the ozone NAAQS.	The BLM will follow all applicable standards set by the Utah Division of Air Quality (see PRMP/FEIS).	No
Megan Williams	76	9	The BLM has not analyzed whether the plan will prevent significant deterioration (PSD) of air quality, as required by they 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	The new air quality analysis will calculate total emissions related to the plan using AP-42 methodology. These emissions will be compared to existing emissions. However, concentrations will not be calculated since dispersion modeling will not be used.	Yes

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			additional increment consumption will occur due to the proposed development. Without this analysis, the BLM is not ensuring that the air quality in the MPA will not deteriorate more than allowed under the CAA.		
Megan Williams	76	10	The BLM must consider the PSD increments as important and legally binding Clean Air Act requirements and it must provide for compliance with these requirements in the EIS/RMP for Monticello. The PSD increments are separate ambient air quality standards not to be exceeded, as set out in 163 of the Clean Air Act, that apply in addition to the national ambient air quality standards in clean air areas. The BLM is required under FLPMA, 43 U.S.C 1712(c)(8), to "provide for compliance with" all Clean Air Act requirements, and thus the BLM cannot authorize an action that would allow the PSD increments to be exceeded. (See also 43 C.F.R 2920.7(b)(3) (requiring the same for land use authorization.)	Please refer to response to comment 55-6.	No
Megan Williams	76	11	The NO emissions from compression are based on the assumption that all gas compressors are equipped with the Best Available Control Technology (BACT) with an emission rate of 0.7 grams of NO per horsepower-hour (g/hp-hr). DEIS/RMP at 4-9. There should be a discussion of Utah's BACT requirements and whether BACT would apply to all compressor engines under current state rules. Because BACT determinations are made on a case-by-case basis, there is no guarantee that similar BACT emission limits will necessarily be required for every compressor engine. Therefore, the BLM needs to provide justification that the emission limits assumed for compressor engines will be similar to, and not less stringent, than those assumed for the BLM's Monticello DEIS/RMP inventory.	A discussion of Utah's BACT requirements has been added to the appropriate section.	Yes
Megan Williams	76	12	The BLM Did Not Include Emissions from Drill Rig Engines in the Air Quality Analysis	The commenter is correct. The RMP states that about 54-74 wells would be drilled over	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			There was no mention in the DEIS/RMP of emissions from the drill rig engines used for oil and gas development. These engines are a significant source of NO emissions and must be accounted for in a comprehensive air quality analysis. The BLM must base emissions from this source on appropriate sized rigs and adequate drilling duration times. NO emissions from drill rigs can account for as much as 40% of all NO emissions in oil and gas development. The omission of NO emissions from this source in the air quality assessment indicated that the potential for ozone impacts could be even higher. As stated previously, the development proposed in this SEIS/RMP threatens compliance with the ozone NAAQS. Higher potential NO emissions make it all the more important that the BLM consider enforceable and meaningful ways to ensure the ozone NAAQS is protected.	the life of the RMP (depending on alternative). This would translate to approximately 4-5 wells per year based on the proposed RFD. This translates to approximately one drill rig operating at any time throughout any year during the plan. Given this level of development, there would be periods where no rigs would be operating during any given year (e.g. assuming 30 days to drill a well, drilling would occur only 5 months of the year). Consequently, due to the extremely low level of development proposed in the Monticello RMP, it is acceptable, as a matter of planning level analysis, to exclude drill rig emissions from the emissions inventory. These emissions would be negligible in the context of the project emissions inventory as well as county-wide emissions. As a result, including drilling rig emissions in the MPA calculations would have over estimated the amount of emissions by an unacceptable level.	
Megan Williams	76	13	It is unclear from the SEIS/RMP to what extent the BLM quantified VOC emissions from oil and gas development. On page 4-14 and 4-15 of the DEIS/RMP the BLM discusses NO and CO emissions from flaring but there are few details of these estimates. The BLM must analyze VOC emissions from flaring and from other potential sources (e.g., from dehydration, well completion, leaking well heads and pipes, etc.). The BLM must analyze all sources of VOC emissions from oil and gas development.	AP-42 methodology has been used to quantify VOC emissions associated with oil and gas development in the revised air quality analysis.	Yes
Megan Williams	76	14	The Monticello DEIS/RMP Does Not Include a Comprehensive Regional Inventory for Use in Determining Cumulative Air Quality Impacts In addition to a comprehensive inventory of oil and gas activities and other BLM-administered activities in the MPA,	A summary of existing emissions in Grand and San Juan County has been updated using 2005 data. This will replace the estimates for 2002 currently in Table 3.4. The units of emissions are in tons/year as reported by the State of Utah. These data can be found at: http://www.airquality.utah.gov/Planning/Emission-Inventory/2005_State/05_State_List.htm	Yes

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			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. The inventory presented in Table 3.4 of the DEIS/RMP for three sources in San Juan County does not constitute an adequate inventory of sources. The inventory of sources should include state-permitted sources in Utah and surrounding states, Utah Division of Oil, Gas, and Mining and Colorado State Oil and Gas Commission permitted oil and gas wells, the oil shale research, development and demonstration sites in Utah and Colorado as well as all reasonably foreseeable development (RFD) sources (e.g., other NEPA projects, proposed power plants, proposed mining operations, future commercial tar sands development, etc.).		
Megan Williams	76	15	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 1,500 MW Desert Rock power plant in northwest New Mexico (no permit issued yet) The 270 MW Sevier Power Company coal-fired plant in Sigurd, Utah in the Richfield PA (recently permitted) The 950 MW Unit 2 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)	Discussion of coal-fired power plants in the region has been added to the discussion of cumulative impacts for air quality.	Yes

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			The 110 MW Unit 2 at the Bonanza Power Plant in Uintah County in northeast Utah (permit issued August 30, 2007) All of these power plants have the potential to impact the same Class I areas that are impacted by the Monticello planning area and, therefore, must be included in the BLM's regional inventory. In addition, the BLM must include in the regional inventory any other new or modified sources, other than power plants, proposed in the region.		
Megan Williams	76	16	The Monticello DRMP/EIS Fails to Include an Analysis of Air Quality Impacts As previously mentioned, the BLM has not completed an adequate air quality impacts analysis as required by NEPA. The BLM must perform a full quantitative assessment of near-field, far-field, and cumulative impacts as part of this EIS/RMP/ This analysis is necessary for the BLM, and the public, to understand the potential human health effects of the activities analyzed under this plan, along with the affects of these activities on visibility and in order for the agency to comply with federal statutes and regulations.	Please refer to response to comment 76-19	No
Megan Williams	76	17	In order to comply with 40 CFR 1502.24 (to ensure the professional and scientific integrity of the air quality analysis), the air quality analysis should include the following components: A near-field modeling analysis of localized maximum ambient air impacts should be performed to assess whether the activities allowed under the Monticello DEIS/RMP alternatives would comply with the NAAQS and the PSD	Please refer to response to comment 76-19	No

AQ – Air Quality					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Class II increments.		
Megan Williams	76	18	In order to comply with 40 CFR 1502.24 (to ensure the professional and scientific integrity of the air quality analysis), the air quality analysis should include the following components: 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 Monticello DEIS/RMP would adversely impact air 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 MPA such as Mesa Verde National Park in southwest Colorado.	Please refer to response to comment 76-19	No
Megan Williams	76	19	Near-Field, far-field, and cumulative impact analyses should be performed for the Monticello DEIS/RMP to provide the public with information on the air quality impacts f the various alternatives proposed and so that state government officials would be aware of any conflicts that could occur with the objectives of Federal, State, and local laws regarding protection of air quality. Such analyses must also be performed so that appropriate mitigations can be developed and put into place to protect air quality in the region the BLM failed to conduct this level of impact analysis for the various alternatives in the Monticello DEIA/RMP and, as stated previously, is not fulfilling its obligations under NEPA.	Quantitative dispersion modeling is inappropriate in the absence of detailed emission data, especially emission source location information. BLM would consider dispersion modeling for a project-specific EIS associated with a proposed project.	No
Megan Williams	76	20	The BLM must also disclose the cumulative hazardous air pollutant (HAP) impacts to the exposed population. The BLM's assessment must be a cumulative one, not just an	AP-42 has been used to estimate total HAPs emissions and compare to current HAPs emissions in San Juan County. HAPs have been added to the discussion on cumulative	Yes

AQ – Air Quality					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			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 formaldehyde as well as diesel exhaust.	impacts.	
Susan Dexter	77	2	To properly assess various alternatives and their impacts, it would be necessary to analyze green house gas emissions associated with each activity (mineral extraction, burning, ORV use, grazing, etc) Furthermore, the analysis would need to include, not just the levels of green house gas increases resulting from the immediate activity, but those of all the activities or processes supporting the activity, including the use of motorized vehicles to transport ORVs to the sites of recreational use; the use of motorized vehicles in grazing activities; the generation of electric power for mining and oil and gas extraction, and so on. These long term cumulative effects are not addressed, whatsoever.	Information on global climate change has been added to the PRMP/FEIS. The degree of specificity requested by the commenter would be purely speculative.	Yes

CUL – Cultural Resources					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Environmental Protection Agency Region 8	1	18	AMS Section 3.3.1 should be corrected to state that while the Uintah and Ouray Indian Reservation is under authority of EPA Region 8, the Navajo Reservation is under the authority of EPA Region 9.	EPA Region 9 has been listed as the authority for the Navajo Reservation.	Yes
State of Utah	4	59	The State suggests that the BLM develop a specific ongoing program to identify and target identification efforts under Section 110 of the National Historic Preservation Act.	These type of actions are administrative and do not require land use planning decisions to accomplish.	No
State of Utah	4	60	The State recommends the BLM undertake a final check to ensure that other potential areas of high cultural resource densities or values are examined for potential conflicts. The MFO should use techniques such as GIS, existing site databases.	On pg. 4-28, a model of cultural resource site density is described that was used to predict potential impacts to cultural resources. This model identified high, medium, and low site densities and this information was used to quantify the impacts. For site specific actions the BLM conducts a Class III cultural survey as appropriate.	No
State of Utah	4	61	The State suggests enhancing and strengthening the density analyses utilized in the Draft RMP/EIS. These techniques could be significantly enhanced and strengthened in implementation of the Final Plan for high cultural resource value areas which include Arch Canyon, Recapture Wash, and Montezuma Canyon.	The BLM will continue to enhance the inventory and density techniques for high cultural value areas identified in the final plan. As prescribed in Table 2.1, Management Common to All Action Alternatives, the BLM will continue to identify areas for special protection of cultural resources and develop specific cultural resource management plans for those areas. These type of actions are administrative and do not require land use planning decisions to accomplish.	No
State of Utah	4	62	Please clarify why Arch Canyon, Recapture Wash, and Montezuma Canyon have not been proposed for specific management consideration. The state recommends that	BLM considers these areas to possess important cultural values and will address issues in these areas with cultural special management plans as described under Management	No

CUL – Cultural Resources					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			these areas be considered for CSMA designation.	Common to All Action Alternatives. Please refer to response to comments 004-59 and 004-61.	
State of Utah	4	63	The RMP proposes avoidance areas around National Register-eligible cultural resources and specific 100-foot buffers (page 4-284 and 4-385). The state recommends that rather than stipulations of a standard avoidance distance that the RMP stipulate that avoidance areas will be established that will be sufficient to protect the resources from direct and indirect impacts.	The intent of BLM is not to require a specific 100-foot buffer around National Register-eligible sites but to require an avoidance distance sufficient to protect cultural resources. The final RMP/EIS will refer to the 100-foot buffer only under Alternative A since that is the current management prescription. BLM will add narrative to the proposed RMP to clarify that a specific avoidance distance will not be required.	Yes
State of Utah	4	64	It is unclear from the RMP (Pages 2-39, 40 and Table 4.18) what protective measures are proposed under the various alternatives for Hovenweep National Monument, Square Tower (and potentially Cajon) Unit(s). Please clarify how potential visual impacts to the setting, feeling, and association of these units, particularly from solid and/or fluid minerals leasing and/or development, will be managed.	Under Alternatives B and C, the Hovenweep ACEC would be expanded 620+ acres from Alternative A , to a total of 2,418 acres. The management prescriptions under Alternatives B and C would be the same as Alternative A (the 620+ acre addition would be managed as the "General Area Exclusive of Special Emphasis Zones"). Table 2.1., pg. 2-39 has been revised to clarify the specific prescriptions that apply to the 620+ acre expansion. The 880 acre visual protection zone around the Monument has been carried forward in the FEIS under an NSO lease category. The total acreage shown on pg. 239 under Alternatives B and C for the Hovenweep ACEC should be 2,418 acres. BLM will correct the error.	Yes
State of Utah	4	65	With exception of the Alkali Ridge NHL, the Alkali Ridge area is listed under all alternatives as open for oil and gas development with either standard conditions or timing/controlled surface use conditions. The area appears to go from VRM Class III to VRM Class IV under all alternatives. The change in VRM Class appears to have the potential to result in adverse effects which will need to be analyzed during consultation on the RMP under Section 106	BLM understands its requirement to consult with the SHPO on the RMP and will comply. VRM class will remain as Class III for Alkali Ridge ACEC in the PRMP.	Yes

CUL – Cultural Resources					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			of the NHPA.		
State of Utah	4	66	The Stipulation in Appendix A (Page A-5) for the Alkali Ridge area reiterates that an avoidance area will be established, but does not note whether this area will include consideration of indirect and cumulative as well as direct impacts to cultural resources.	BLM has reconsidered the stipulations for the Alkali Ridge ACEC and has rewritten them to include consideration of direct and indirect impacts to cultural resources.	Yes
State of Utah	4	67	The RMP rightly notes that the decisions have potential to cause adverse effects to cultural resources. These potential adverse effects may need to be addressed via mitigation during consultation of the RMP under Section 106 of the NHPA.	Please refer to response to comment 004-65	No
State of Utah	4	68	Table 2.1 (Page 2-8). The state encourages BLM to clarify the purposes and types of land treatments that could be authorized in the Comb Ridge CSMA, specifically whether land treatments modify the NSO stipulation as well as what VRM class would apply to this area.	The Comb Ridge CSMA will be carried forward into the Proposed RMP as a recreation management zone within the Cedar Mesa Special Recreation Management Area (SRMA). Most of the management prescriptions proposed for the Comb Ridge CSMA will apply to the Comb Ridge recreation management zone. Future activities within the recreation management zone would be required to comply with those management prescriptions, including NSO and VRM II management objectives. Appendix A in the proposed RMP lists stipulations, including NSO and VRM II, that apply to surface disturbing activities within specific areas of the Monticello Field Office. The stipulations do not apply to non-surface disturbing activities as defined in the appendix. It is conceivable that non-surface disturbing activities could be allowed in the Comb Ridge recreation management zone. That determination would be made through site specific analysis of the proposal.	Yes
State of Utah	4	69	Table 2.1 (Page 2-9). The area identified as “Butler Wash East of Comb Ridge” is not mapped like the other CSMAs.	The area identified as the "Butler Wash East of Comb Ridge" is part of the Comb Ridge SRMA. That part of the SRMA east	No

CUL – Cultural Resources					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Please clarify whether this CSMA is mapped as part of the Comb Ridge CSMA and how large the Butler Wash East of Comb Ridge CSMA would be.	of Comb Ridge was distinguished from the remaining area because it required separate prescriptions to address special management needs. The Comb Ridge SRMA will be carried forward into the proposed RMP as a recreation management zone within the Cedar Mesa Special Recreation Management Area (SRMA). Please refer to response to comment 004-68.	
State of Utah	4	70	The BLM notes in the RMP/DEIS on pages 4-284 and 4-385, that preservation-related management decisions would avoid cultural resource impacts by incorporating a buffer around sensitive areas. Please clarify what resources BLM intends to protect with buffers.	Buffers around cultural sites are not specifically defined but stated as "sufficient to allow for complete avoidance of the cultural resource" to prevent direct and most indirect impacts. The avoidance distance would be specific to the disturbing action. Please refer to response to comment 004-63.	No
HOPI	5	1	The Hopi Tribe objects to BLM's policy that excludes the reburial of NAGPRA materials housed in BLM museum collections.	The issue of reburial is outside the scope of the land use plan. According to IM 2007-002, this issue is authorized on a case by case basis.	No
HOPI	5	2	The Hopi Tribe supports Alternatives B and E as they provide the maximum protection for nationally significant cultural resources. In these alternatives, heritage tourism sites would be developed with an emphasis on site protection to facilitate visitation. The ACECs included in these two alternatives should be included in the Preferred Alternative.	The commenter's support for Alternatives B and E are noted.	No
HOPI	5	3	The Hopi Tribe does not support allocation of sites for scientific use. Avoidance of Hopi sacred sites is the only real means of preventing impairment of these resources. To this end, the Tribe requests continuing consultation on the selection and allocation of ancestral sites for interpretive development, educational uses, public visitation and scientific uses.	The BLM is committed to consult with Native Americans as required by 36 CFR 800.2 and described in BLM Manual 1820. Appropriate implementation level actions will follow the BLM's established protocol for consultation.	No
Ute Mountain Ute Tribe	6	2	The Tribe requests that BLM take measures to preserve the cultural and historical values of Allen and Cottonwood	The BLM acknowledges the importance of the cultural and historical values of Allen and Cottonwood Canyons to the Ute	No

CUL – Cultural Resources					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Canyons including closure, if necessary.	Mountain Ute Tribe. The BLM is committed to consult with Native Americans as required by 36 CFR 800.2 and described in BLM Manual 1820. Appropriate implementation level actions will follow the BLM's established protocol for consultation.	
Ute Mountain Ute Tribe	6	3	The Ute community gathers plants for medicinal, spiritual and sustenance purposes in the planning area; particularly in Cottonwood and Allen Canyons and Comb Ridge areas. The DEIS does not address gathering of many of these plants. The Tribe requests that BLM work with the Tribe to develop a plan that minimizes or eliminates administrative burdens on traditional gathering practices.	One of the goals stated in the Vegetation Section of Table 2.1, Page 2-57, is to provide opportunities for plant material gathering of various vegetation types while protecting other resources. The BLM would work on an administrative level with the Ute Mountain Ute tribe to facilitate traditional plant gathering.	No
San Juan County	7	27	Pg. 2-8 and 2-9 - The management prescriptions for the Comb Ridge CSMA are more restrictive for Alternative C than Alternative B with regard to group size. The County questions how limits on group size and restrictions on collection of firewood for campfires can be enforced.	The restrictions on group size have been eliminated in the PRMP and collection of firewood for campfires is not restricted in the PRMP. Therefore, enforcement is not an issue.	No
San Juan County	7	28	Pg. 2-11 - The County requests BLM's rationale for the limits of people per day, numbers in rooms and numbers in corridors proposed for McLoyd Canyon-Moon House CSMA. How will compliance be accomplished?	The limits for people per day, numbers in rooms and numbers in corridors in the McLoyd Canyon-Moon House area are based on the results of a condition assessment that was conducted for the Moon House Complex. This condition assessment was conducted by the National Park Service, Archaeological Site Conservation Program, Mesa Verde National Park. The limits are designed to protect the site from threats caused by uncontrolled visitation. Such threats include damage to existing intact plaster walls and damage to structural elements such as walls and floors that are already weakened by visitation and other natural factors. Compliance will be accomplished through establishment of a site stewardship program for the site, information about	No

CUL – Cultural Resources					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				visiting the site that will be provided at the Kane Gulch Ranger Station, and through patrols by BLM rangers and law enforcement.	
San Juan County	7	29	Pg. 2-12 - The Hole-in-the-Rock trail is one of regional and national importance and yet is basically ignored in the DRMP. The BLM should consider assistance from other individuals, organizations, and government entities that have an interest in interpreting and protecting the trail.	The BLM does consider assistance from other individuals, organizations, and government entities who may have an interest in the Hole in the Rock Trail. In Table 2.1, page 2-12, Historic Trails, under Management Common to All Alternatives, it states that the Hole in the Rock Trail would be managed for Heritage Tourism in consultation with the Utah State Historic Preservation Office and Native American Tribes, as well as interested stakeholder groups.	No
San Juan County	7	37	Pg. 2-25 - The one goal listed for the Cedar Mesa Cultural SRMA is "Integrate management between the BLM and NPS to provide outstanding recreational opportunities and visitor experiences while protecting natural and cultural resource values." The County feels there are little shared recreational opportunities across the BLM/NPS common boundary because of topography and other factors. Also, there is nothing to address this goal in Appendix E Recreation, or Chapter 4.	Although opportunities may be limited, the BLM will strive to integrate management between the BLM and NPS to provide outstanding recreational opportunities and visitor experiences while protecting natural and cultural resource values when possible.	No
Utah Rock Art Association	9	1	Given the importance of these CRMPs we believe it is essential that they be established prior to the implementation of any C-SRMA or C-SMA or other cultural tourism initiatives under this RMP. We are concerned that these plans will never be developed.	In the DRMP/DEIS, on page 2-8, “Management Common to all Action Alternatives”, resource management plans discussed in the DRMP/DEIS are to be addressed as well as other specific cultural management as the needs are identified. Specific time frames are not stated in order to allow these plans to be developed in a priority order based on immediate impacts and individual site(s) need(s) for protection and preservation	No
Utah Rock Art Association	9	2	Decisions without data. Less than 10% of the area has been subjected to detailed cultural inventories. In fact, the Monticello RMP specifically notes that there are still large areas for which there is no current information regarding the numbers, types, and distribution of cultural resources	For the purpose of planning documents at the level of DRMP/DEIS, additional field inventory is not required. A systematic interdisciplinary approach was used to provide accurate, objective and scientifically sound environmental analysis on the environmental consequences associated with	No

CUL – Cultural Resources					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				the management actions or prescriptions under each alternative.	
Utah Rock Art Association	9	3	The commenter notes an anti-human bias with the limitations placed on human activities. An example is in the Comb Wash C-SRMA in Alternative E which requires packing out human waste and people being limited to designated trails at the same time as cattle grazing is permitted.	There are several concerns about human fecal material accumulating in the COMB Ridge CSMA. One is unsanitary conditions in the watershed that drains into the San Juan River. Both commercial and private river trips are required to pack out all human waste. Another concern is digging holes for burial of human fecal material and contaminated toilet paper. In some cases, these holes are being dug within cultural sites. In addition, some holes are too shallow to accommodate all the waste which erodes onto the surface and blows in the wind. Cattle, on the other hand, do not dig holes for fecal material or use toilet paper. Designating trails for access into cultural sites within the Comb Ridge CSMA will provide protection for site middens and other sensitive architectural features. Cattle are to be fenced out of the Butler Wash Canyons to protect these same sites from trampling and destruction of cultural features.	No
Utah Rock Art Association	9	4	C-SRMA and C-SMA designations have not received the same analysis that special designations normally receive. For example, environmental consequences have not been assessed for these designations.	Environmental analysis for these designations will be done after the management plans are written for these areas.	No

FIR – Fire Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
U.S. Fish and Wildlife Service	2	23	Page 4-421 in section 4.3.15.1. In second paragraph: "...assuring that special status species would not be directly impacted by fire." This statement appears contradictory to the following paragraph which describes direct and indirect impacts associated with fire.	The second paragraph on Page 4-421 in section 4.3.15.1 describes the Reasonable and Prudent Measures and Terms and Conditions identified by the USFWS in their Biological Opinion to mitigate fire-related actions outlined in the LUP Amendment. Further, the paragraph highlights "…maintenance of existing healthy ecosystems and protection of T&E and special status species as criteria for establishing fire management priorities." The implementation of these two priorities and maintenance of existing healthy ecosystems, in particular, is referred to as having beneficial impacts on special status species. In contrast, the paragraph that immediately follows on Page 4-421 refers to wildland fire use and potential subsequent impacts. The BLM does not find a contradiction between these two paragraphs.	No
San Juan County	7	30	Pg. 2-13 - The Prescott National Forest has used goats in critical WUI areas to successfully reduce fuels. Is the BLM planning to use goats/sheep as a fuel treatment? If so, where and how?	The Finding of No Significant Impact and Decision Record for the Utah Land Use Plan Amendment for Fire and Fuels Management (UT-USO-04-01) signed in September of 2005 identifies maximum treatment acres and authorizes fuels treatment activities for the Monticello Field Office. The Land Use Plan Amendment, the associated USFW Biological Opinion, and the Resource Protection Measures developed to minimize or avoid resource impacts from fire management actions are incorporated into this RMP. The LUP Amendment incorporated new fire management policy, guidance and directives for BLM-administered lands in Utah, although detailed information regarding fire management goals and objectives was provided in a programmatic Fire Management Plan (FMP). The FMP covers field offices administered by an individual fire district such as the Moab Fire District which oversees fire management for the Monticello Field Office. The LUP Amendment for Fire and Fuels states (Chapter 1, page 1-11) that the [EA] is limited to	No

FIR – Fire Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				planning-level analyses and that site-specific analysis of resources such as air, water, soil, and cultural is conducted for individual fire management planning and implementation actions. Public comment was solicited for the LUP Amendment as well as for the Moab Fire District FMP. The EA process also involved collaboration between the public, the BLM and other governmental and local agencies. The LUP Amendment states (Chapter 2, page 2-10) that acreages identified for fire management [in the LUP Amendment and as carried through in the RMP] are broad guidelines useful for the development of field office Fire Management Plans (FMP), and are not "assumed to be quotas, targets or exact limitations." The FMP covering the Monticello Field Office does include descriptions of individual Fire Management Units (FMUs) for the vegetative communities within the field office, and outlines general fire management goals for each of those FMUs. The programmatic EA for the FMP (UT-063-04-02, UT-060-2005-042) analyzed the overall direct, indirect and cumulative impacts of fire management goals and objectives. Individual vegetation treatment methods, potential impacts from treatments, and the number of acres proposed for a treatment in a vegetative community or communities would be detailed and analyzed at a project-level basis in a site-specific NEPA document.	
Lynell Schalk	29	17	Why is the data for the amount of wood permits sold by the MFO from 2003 rather than a more current date? What are the current trends? What is the data for number of citations issued for illegal wood cutting?	The RMP uses the best available information. The numbers are provided for comparative purposes only.	No
ECOS Consulting	58	10	The Monticello DRMP/EIS states: "Under all alternatives, estimated fuels reduction treatments of 5,000 to 10,000 acres per year would be targeted….." Yet the BLM provides no information of the actual extent of area within the Monticello Planning Area that has too much fuel and is in	The Finding of No Significant Impact and Decision Record for the Utah Land Use Plan Amendment for Fire and Fuels Management (UT-USO-04-01) signed in September of 2005 identifies maximum treatment acres and authorizes fuels treatment activities for the Monticello Field Office. The Land	No

FIR – Fire Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			need of intensive fuel reduction treatment, or what the standards are for determining why an area has too much fuel.	Use Plan Amendment, the associated USFW Biological Opinion, and the Resource Protection Measures developed to minimize or avoid resource impacts from fire management actions are incorporated into this RMP. The LUP Amendment incorporated new fire management policy, guidance and directives for BLM-administered lands in Utah, although detailed information regarding fire management goals and objectives was provided in a programmatic Fire Management Plan (FMP). The FMP covers field offices administered by an individual fire district such as the Moab Fire District which oversees fire management for the Monticello Field Office. The LUP Amendment for Fire and Fuels states (Chapter 1, page 1-11) that the [EA] is limited to planning-level analyses and that site-specific analysis of resources such as air, water, soil, and cultural is conducted for individual fire management planning and implementation actions. Public comment was solicited for the LUP Amendment as well as for the Moab Fire District FMP. The EA process also involved collaboration between the public, the BLM and other governmental and local agencies. The LUP Amendment states (Chapter 2, page 2-10) that acreages identified for fire management [in the LUP Amendment and as carried through in the RMP] are broad guidelines useful for the development of field office Fire Management Plans (FMP), and are not “assumed to be quotas, targets or exact limitations.” The FMP covering the Monticello Field Office does include descriptions of individual Fire Management Units (FMUs) for the vegetative communities within the field office, and outlines general fire management goals for each of those FMUs. The programmatic EA for the FMP (UT-063-04-02, UT-060-2005-042) analyzed the overall direct, indirect and cumulative impacts of fire management goals and objectives. Individual vegetation treatment methods, potential impacts from treatments, and the number of acres proposed for a treatment	

FIR – Fire Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				in a vegetative community or communities would be detailed and analyzed at a project-level basis in a site-specific NEPA document.	

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
National Park Service Intermountain Region	3	13	The NPS requests that the Glen Canyon NRA portions of Dark Canyon, Gypsum Canyon, and surrounding areas be added to Map 12 and the alternative and environmental consequences chapters describing areas that will continue to be unavailable for livestock grazing to protect scenery, wildlife and relict vegetation.	Livestock grazing within the Glen Canyon NRA is administered in accordance with the 1984 MOU and the Glen Canyon NRA Grazing Management Plan (1999). BLM's responsibilities for grazing management in the NRA must be in accord with the NPS General Management Plan for the NRA. Exclusion of grazing within the NRA is not a BLM planning decision.	No
National Park Service Intermountain Region	3	15	The Glen Canyon NRA Grazing Management Plan describes over 200 active AUMs less than what is described in the 1991 San Juan Resource Area RMP and the Monticello Field Office DRMP/DEIS for the Perkins Brothers Allotment.	Please refer to response to comment 003-14.	No
National Park Service Intermountain Region	3	16	There are 32 fewer active AUMs described in the DRMP/DEIS for the Texas Muley Allotment than described in the Glen Canyon NRA Grazing Management Plan.	Please refer to response to comment 003-14.	No
National Park Service Intermountain Region	3	17	There seems to be a discrepancy between how many livestock AUMs are on the current permit for the White Canyon Grazing Allotment and what is defined in the Monticello Field Office DRMP/DEIS (Appendix 8-A) and the 1999 Glen Canyon NRA Grazing Management Plan.	Please refer to response to comment 003-14.	No
State of Utah	4	7	The state discourages permanent closure of grazing allotments and encourages the reinstatement of suspended AUMs when rangeland conditions permit.	The BLM does not propose the permanent closure of allotments or portions thereof. However, certain allotments or areas may not be available for grazing over the next 15 years. These areas considered as not available are spread by alternative. Subsequent revisions of the land use plan may consider opening these areas to livestock grazing. Reinstatement of suspended AUMs and adjustment of available active AUMs will be considered during the site specific grazing permit renewal process, which will analyze forage productivity, grazing capacities, and vegetative trend in relation to sustainable grazing practices in accordance with	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				the Standards for Rangeland Health (pg. 2-16). The vast majority (93%)of the Monticello Planning Area is available for livestock grazing. For those limited number of allotments and areas shown on pages 2-16 through 2-18 of the DRMP/DEIS the BLM is proposing that other uses of the BLM land are the highest and best use of these areas. Both FLPMA and BLM's Land Use Planning Handbook authorize BLM to close specific areas to livestock grazing to place an emphasis on these areas for other purposes or values, such as wildlife use, watershed protection, and recreation. As indicated by the variable uses of the BLM lands, as shown in the proposed action, it is BLM's intention to emphasize "multiple use" of the public lands within the planning area.	
State of Utah	4	8	The state encourages flexible livestock grazing time (duration) and timing (season of use).	As stated in the Draft EIS / RMP (pg. 2-16), grazing would be managed on an allotment basis according to the Guidelines for Livestock Grazing Management to meet the Standards for Rangeland Health (see Appendix D), including duration and adjustment in season of use. An allotment's associated 10 year term Grazing Permit outlines the season of use and livestock numbers. A yearly Grazing Application allows flexibility in relation to annual forage production that must meet these Standards for Rangeland Health and be pre-approved by the authorized officer.	No
State of Utah	4	9	The Final RMP should contain and rely on a robust monitoring program and BLM should work with the state, grazing permittees, and conservation organizations to actively monitor and record grazing use data, wildlife populations, and range conditions.	BLM will follow its policy which includes an active monitoring program with full coordination/consultation with grazing permittees, affected state agencies and conservation organizations.	No
State of Utah	4	45	Please clarify at pp. 2-17 and 4-75 why allotments would be unavailable for livestock grazing for the life of the plan. Please clarify if using the term "unavailable" reflects a decision to temporarily suspend, or permanently retire	Areas are to be made unavailable for grazing due to potential conflicts with other resources or uses (wildlife habitat, primitive recreation, vegetation, cultural, etc), areas being unsuitable for feasible grazing practices (lack of water/forage,	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			grazing.	inaccessibility, etc.), and permittee requests. Unavailable refers to these areas not being authorized for livestock grazing during the next 15 years.	
State of Utah	4	46	There is an apparent discrepancy in the number of acres unavailable for livestock grazing under all alternatives as indicated on pages 2-16 and 4-254. Please resolve.	Acreages for particular areas may vary slightly due to the differences in shapefiles for GIS calculations. The correct acreage figure is 128,098 acres to remain unavailable for grazing. Additional acres unavailable for grazing are added to this figure in each alternative. Acreage corrections have been made in the FEIS.	Yes
State of Utah	4	47	Under the No Action Alternative, BLM would make an additional 20,361 acres unavailable for livestock grazing. Please clarify why the No Action Alternative involves a change in current management.	The No Action Alternative implements a previous court decision pending final determination in RMP revision that closed grazing in several Comb Wash side canyons (Mule Canyon south of U-95, Arch, Fish, Owl, and Road). This decision closed 16,599 acres (pg. 2-92) (20,361 is incorrect). These acres are included in acres closed under the No Action Alternative, thus no change in current management (see pg. 4-70). The statement of additional acres unavailable on page 4-254 is incorrect as these acres are already included in the No Action Alternative acres. These errors have been corrected in the FEIS.	Yes
Ute Mountain Ute Tribe	6	5	The Tribe has a grazing permit for Cottonwood and Comb Wash allotments and supports continued opportunities for grazing within the Planning Area.	BLM recognizes this comment and notes that both of these allotments are included in those areas where livestock grazing is to be continued with modifications (such as exclusion of grazing in the 5 side canyons of the Comb Wash allotment).	No
San Juan County	7	6	San Juan County supports livestock grazing in a prescriptive manner to accelerate progress toward improved rangeland health and reduction of catastrophic fire. The BLM should reassess timing and season of use for grazing.	The BLM Land Use Planning Handbook (H-1601-1) requires the BLM to identify lands available or unavailable for livestock grazing. This is the only planning decision within the RMP. Decisions concerning timing and season of use are made on an allotment basis using the Standards for Rangeland Health and Guidelines for Grazing Management.	No
San Juan County	7	7	San Juan County feels that social/economic analysis for livestock grazing is inadequate, as many allotments have	Only one entire allotment is to be closed to grazing and that is the Dodge Canyon allotment (1598 BLM acres). This	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			been reduced or closed. The county urges BLM to look at grazing on a watershed basis vs. an allotment basis so that livestock operations would have opportunities to be more profitable but also to benefit wildlife and other resources.	allotment has been in voluntary non-use for many years so there would be no change in the grazing situation from formal closing of the allotment to grazing in the PRMP. Other areas to be excluded from grazing are parts of allotments, not entire allotments. In all cases, these areas have not been used by livestock for many years so there would be no real change to the permittee or the on-ground situation from exclusion of livestock. BLM agrees that using a watershed perspective is important and may allow more flexibility in managing livestock operations for a wider range of benefits. This type of management can be used at the activity planning level regardless of whether it is so stated in the RMP. However individual allotments would still have to be considered as the building blocks to such an approach because of the tie of grazing preference to individual allotments.	
San Juan County	7	32	Pg. 2-16 - Under Livestock Grazing, Management Common to All Alternatives, the statement "Modify and implement existing Allotment Management Plans…that require such action" is unclear. Please clarify intent and need.	The intent is to use an AMP where appropriate as the vehicle to implement grazing management actions which would facilitate maintaining or achieving Standards for Rangeland Health. Not all allotments would need an AMP to accomplish this goal. Those listed are existing AMPs and those allotments where new AMPs would be most effective.	No
San Juan County	7	33	Pg. 2-17 - Please furnish rationale and authority to allocate 17,300 acres to wildlife (parts of Peter's Canyon and East Canyon).	This is an allocation recommended by the Grazing Advisory Board in the 1960's or early 1970's which was approved in a previous Management Framework Plan (Land Use Plan) and has been in effect since that time. The rationale was that these steep slopes and benchlands along the edges of these canyons were better suited to wildlife use than domestic livestock. The authority is in the Taylor Grazing Act, Grazing Regulations and Land Use Planning Regulations.	No
San Juan County	7	34	Pg. 2-17 - San Juan County policy is against the relinquishment or retirement of grazing rights in favor of	BLM does not encourage relinquishment of grazing preference. BLM policy recognizes the prerogative of a	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			conservation, wildlife and other uses. Please clarify BLM's goals in encouraging relinquishment and what mechanism would be used to retire grazing rights.	grazing permittee to voluntarily relinquish his grazing preference. As stated on Pg. 2-17 of the DEIS, once relinquished, the preference is still available for application for preference for grazing by livestock unless BLM determines that the lands are better used for other purposes. If the latter is the case, discontinuation of grazing would be made by amendment to the RMP. Even so, discontinuance would not be permanent but would be subject to reconsideration during subsequent revision or amendment of the RMP.	
San Juan County	7	70	San Juan County is concerned with any language in the DRMP/EIS that would accept whatever wildlife herd number objective the UDWR may give to BLM, if accepting that herd number means BLM has to place more active use livestock AUMs in suspension. The County feels that BLM has an obligation to tell the UDWR to reduce its herd size objectives in order to allow the restoration of all suspended use AUMs back to active use AUMs for livestock, as guaranteed by the Taylor Grazing Act.	BLM works cooperatively with UDWR to provide habitat for wildlife herd objective levels which are set by UDWR and the wildlife boards (on which BLM has a representative) in an open public process. As provided for in FLPMA, the Secretary has the discretion, in the land use planning process, to modify levels of use including livestock grazing. While it is the goal of the BLM to enhance rangeland health while providing for domestic sources of minerals, food, timber and fiber, there is no requirement in the Taylor Grazing Act (TGA) or other applicable law for the BLM "to allow the restoration of all suspended use AUMs back to active use AUMs for livestock" to the detriment of other uses of the public lands. According to FLPMA, BLM is to manage for "multiple uses" which best meet the present and future needs of the American people without permanently impairing the productivity of the land.	No
San Juan County	7	71	Utah Code Section 63-38d-401 prohibits permanent closure of grazing allotments and conversion of livestock AUMs to wildlife or other uses. The County is concerned that any decision to diminish grazing AUMs for any reason other than rangeland conditions is contrary to state law and is inconsistent with San Juan County public land policy and plans.	BLM is not permanently closing grazing allotments. BLM is determining that certain areas will be unavailable for livestock grazing for the life of the RMP. These determinations may be reconsidered at any time and changed by amending the RMP or during revision of the RMP. The BLM is aware that there are specific County and State	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			When considering non-use, transfers of AUMs, suspensions of use or reductions of livestock AUMs, relinquishments or retirements, BLM decisions should be scientifically based on range conditions or rangeland health standards. Suspensions or reductions in AUMs should be temporary and should be restored to livestock use when rangeland conditions improve and not converted to wildlife or other use.	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 County plans, to the maximum extent possible by law, and that 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 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 PRMP/FEIS, 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.	
San Juan County	7	72	Transfer of AUMs to wildlife violates the Taylor Grazing Act and FLPMA and would require amending Presidential Executive Orders 6910 and 6964 which withdrew public lands as chiefly valuable for grazing.	The Monticello RMP determines the allowable uses of the public lands as provided for in FLPMA. FLPMA states in section 202(a) that land use planning provides for the use of the public lands “regardless of whether such lands previously have been classified, withdrawn, set aside, or otherwise designated for one or more uses”. FLPMA further provides in Section 202(e) the authority to issue management decisions which implement newly developed or revised land use plans. BLM is not proposing to change the Grazing Districts set up under the Taylor Grazing Act and no change to Presidential Executive Orders 6910 and 6964 is needed. The Secretary has the discretion under FLPMA to use the land use planning process to close areas to grazing, change levels of use, or to devote the land to another public purpose in accordance with the relevant land use plan. Under FLPMA, BLM is to manage for “multiple uses” which best meets the present and future needs of the American people without permanently impairing	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				the productivity of the land. The combinations of uses proposed in the Draft RMP/EIS are varied and diverse across the planning area taking into consideration the current and future needs of the public. This is consistent with both FLPMA and the TGA. The RMP does not propose to transfer AUMs from livestock to wildlife but reflects BLMS desire to manage for multiple uses of the public lands and, where appropriate, limit livestock grazing to emphasize other uses of BLM lands.	
Sierra Club Utah Chapter	17	7	Regarding livestock grazing, commenter states: "These sections fail to adequately address all the issues related to commercial livestock grazing."	Livestock grazing decisions are typically implemented at an allotment level during the grazing permit renewal stage. This phase contains greater site specific detail and issue analysis through the development of an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA). In expressing his opinion, commenter lists and quotes several studies regarding grazing and forage production. The commenter's own quote "The Information Quality Act (IQA) guidelines make clear that BLM must ensure the objectivity of information provided to the agency by third parties. . ." seems to be applicable here.	No
Sierra Club Utah Chapter	17	8	Commenter states: "The Monticello Field Office should initiate a round of forage capacity analyses including clipping studies, reviewing trend data to see if plant cover, variety, and biomass have changes over the years.	Long-term vegetative trend collection and monitoring are standard operating procedure for the BLM..	No
Lynell Schalk	29	7	Grazing Acreage Inconsistency: There are two identical statements made regarding the number of acres "unavailable for livestock grazing for resource protection" within boundary allotments. One indicates 125,356 acres (Reference: pg. 3-41, Vol. 1). The other indicates 137,440 acres. Which is it?	Acreages for particular areas may vary slightly due to the differences in shapefiles for GIS calculations. The correct acreage figure is 128,098 acres to remain unavailable for grazing. Additional acres unavailable for grazing are added to this figure in each alternative. Acreage corrections and inconsistencies have been made in the FEIS.	Yes

GRA – Livestock Grazing					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Lynell Schalk	29	8	Grazing Allotments: Because there is no accompanying map depicting where each of the 75 grazing allotments is located, it is impossible to locate them based on the names used to describe them.	An allotment map with associated names for the Monticello Field Office has been included in the final Resource Management Plan.	Yes
Broads Healthy Lands	41	27	Grazing should be eliminated in areas with significant cultural resource values, in any riparian area, and in areas of low forage productivity with easily erodable soils. The breakdown of biological soil crusts in many areas in the region is leading to desertification and dust storms which is having significant effects on rates of snowmelt in the San Juan Mountains, to name one example. There is no analysis of these regionally negative impacts of grazing within the planning area. Such cumulative impacts analysis must be a part of the final RMP.	Livestock grazing will adhere to Utah's Standards for Public Land Health and Guidelines for Livestock Grazing Management. These standards incorporate biotic integrity, hydrologic functions, and soil stability into overall public land health. Managing for proper biotic integrity and soil stability will ensure the rangeland's sustainability, including areas of low forage productivity with easily erodible soils. The BLM considers and utilizes biological soil crust development as a functional indicator for landscape health. BLM incorporates Proper Functioning Condition (PFC) assessments for riparian areas, and manages for PFC conditions to ensure stream channel morphology and appropriate functionality. Riparian areas with properly managed livestock grazing can achieve and maintain PFC. Management strategies and restrictions will be developed as necessary in riparian communities rated as Functioning-at-Risk and/or Non-Functional to meet or maintain PFC. Grazing is a compatible multi-use of public lands in areas of significant cultural resource value. Cultural sites impacted by any factor, including grazing, will be appropriately mitigated on a site specific basis. Livestock grazing decisions to ensure the meeting of Standards for Public Land Health and PFC are typically implemented on an allotment scale during the Grazing Permit	No

GRA – Livestock Grazing					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
				Renewal phase. Renewal of a grazing permit includes the development of an Environmental Assessment (EA), which analyzes and mitigates potential impacts to the affected environment and considers cumulative impacts. Riparian conditions, public land health, vegetative trend, and climatic data are some examples that are considered by the BLM during the development of an EA's proposed action for a sustainable grazing program.	
The Nature Conservancy	49	4	The DRMP does not appear to contain a commitment to sustaining "health" of coarser-scale ecological systems, at least in principle. However, we recommend that such language be improved by adding the following points: --Within Management Common to All Alternatives for Livestock Grazing (Page 2-16) is a statement indicating grazing will be managed according to Standards for Rangeland Health and Guidelines for Livestock Grazing Management. However, we urge that a statement be added that clarifies the appropriate assessment tool to evaluate if Rangeland Health Standards are being met. The most suitable tool available to and endorsed by the BLM is Interpreting Indicators of Rangeland Health (technical reference 1734-6 2005) and, when appropriate, the complimentary manuals, Monitoring Manual for grassland, Shrubland and Savanna Ecosystem; Volumes I and II.	The DRMP does contain a commitment to sustaining long-term public land health at a landscape ecological scale. The referenced statement that "grazing will be managed according to Standards for Rangeland Health and Guidelines for Livestock Grazing Management" is a direct reference to BLM's adoption of these standards and guidelines, which encompass the referenced "Interpreting Indicators of Rangeland Health" (technical reference 1734-6). Also, 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".	No
Tom Ratcliff	56	1	I'm interested in management indicators such as: what determines range readiness? Is that determined by plant growth/condition, or is that determined by calendar date? In dry years, such as we've had lately, what determines off-	Grazing allotments are authorized under a term Grazing Permit and managed through a yearly Grazing Application that must be pre-approved before livestock use commences. The BLM determines range readiness in relation to livestock	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			dates for allotments? Is that determined by utilization standard or calendar date? Who maintains range allotment improvements, e.g. fences, water developments? What percent utilization of key forage plants, grasses and shrubs is allowed? Is stubble height used for management? Where are key areas on allotments? In key big game range areas (deer, elk, bighorn and pronghorn) what grazing season is allowed, and what allowances are made for those wildlife forage needs? What indicators will determine when livestock will be moved to the next pasture or home? On lands that are burned or seeded or otherwise treated, what is your policy on moving livestock to "vacant allotments"? Since "99% of the MFO area is grazed," yet 40% of your riparian areas are not at PFC, what grazing management steps have been applied to move those riparian areas toward PFC? How are those steps working? Is stream bank trampling used as an indicator to move or remove livestock? How is trampling at springs and seeps handled? How are livestock managed in critical species habitat, e.g. along the San Juan River, which is listed species Critical Habitat? Was a Consultation with US Fish and Wildlife Service done for those allotments that contain or are connected to listed species Critical Habitat? If not, why not? If so, what are the terms and conditions under which grazing is allowed?	grazing each year before approving the application, which is highly variable dependent upon recent climatic conditions and forage development. BLM uses a number of criteria and management indicator in determination of appropriate grazing levels, including riparian Proper Functioning Condition, Utilization of Key Species, precipitation data, forage growth, etc. All BLM guidelines, manuals, and Code of Federal Regulations are followed in making these determinations. Annual allotment based decisions are site specific and quite variable, thus beyond the scope of the Resource Management Plan.	
Tom Ratcliff	56	2	In the final analysis, your "Livestock Grazing" section is incomplete and inadequate. Real issues of serious range management problems are not disclosed; a significant portion of the workload is dismissed by placement in to "custodial" management. Alternative A makes several grazing management changes, which is good, but which is not "No Action". Specific range management measures needed for range improvement are not disclosed, and in the end, AUM reductions between Alternatives are not significant, ranging from 750 to 940 out of a total program of 78,796 AUMs. (1% decrease at most extreme) The	Alternative A is referred to as the "No Action" alternative which means continuation of current management (including action items) under the 1991 RMP. The purpose of the current RMP revision was to update the RMP to provide management consistent with changes that have occurred since completion of the 1991 RMP. Alternatives were designed to provide a range of actions to resolve issues brought out by public scoping and internal review.	Yes

GRA – Livestock Grazing					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			"Livestock Grazing" discussion is simply a justification for continuing business as usual. There is no significant change proposed, nor are there significant differences between Alternatives.	Please refer to response to comment 058-4.	
ECOS Consulting	58	3	As there is little dispute that livestock grazing results in some of the most widespread and greatest negative impacts on the ecosystem of any other land use, the Monticello DRMP/EIS, must be very clear as to where grazing will be allowed and where it is not allowed, and the BLM must list all riparian area and their condition, and future management plans for each. 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 many published papers (see above list).	The land use planning decision for livestock grazing involves identifying the areas that are available or not available for grazing. There is a narrow range in the alternatives for livestock grazing because the entire area is considered chiefly valuable for livestock grazing. Therefore, only areas with known major resource conflicts were considered as unavailable for grazing during the life of the land use plan. All other resource concerns involving livestock grazing are evaluated on a site specific allotment basis during permit renewal utilizing the Standards for Rangeland Health and Guidelines for Grazing Management. 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 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	No

GRA – Livestock Grazing					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
				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.	
ECOS Consulting	58	4	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 of grazing (>90%). As proposed -- with most of the area within the Monticello Planning Area open to the widespread soil and vegetation adverse impacts of livestock grazing, probably over 88% or approximately 1,800,000 acres -- it appears that the FLPMA mandates of "multiple use" and "sustained yield" are in jeopardy.	Alternatives for no livestock grazing and an increased allocation of forage to wildlife and other non-consumptive uses were considered for inclusion in the DRMP/DEIS. However, they were eliminated from further analysis; a discussion concerning these alternatives has been included in Chapter 2 of the PRMP/FEIS, Section 2.3, Alternatives Considered but Eliminated from Analysis. 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	Yes

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				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.	
ECOS Consulting	58	19	Page 3-42 5th Paragraph. The information provided in Table 3.13 was collected in the 1980's and is outdated (too old) and must be updated so that the public and managers can assess the effectiveness of livestock grazing management decisions in the past 20 years. This table is appropriate for the last RMP that was done in 1991. Considering the results listed in Table3.12, livestock grazing must be deemed an "inappropriate use" for most of the lands (88%) of the Monticello Planning Area. 3.6% of allotments in potential natural community is a pathetic outcome of many years of "BLM management."	The percentages of ecological class are being updated as the term permits are being done by allotment. The effectiveness of livestock grazing is determined by the trend studies that are used in evaluating vegetation. The IIRH is an attempt to look at how well ecological processes on a site are functioning.	No
ECOS Consulting	58	24	4.3.13.3.2 Impacts of Livestock Grazing Decisions on Soils and Waters Page 4-364, 1st Paragraph: Here it is stated: "Livestock grazing management decisions would affect soils and water resources when AUM's for livestock and/or wildlife are adjusted in response to evidence from monitoring that water quality or soil degradation is imminent or occurring." What measurable standards and objective monitoring protocols and programs does the BLM have for determining the condition of its soils? None have been described in this DRMP, and without an objective monitoring program the sentence above is meaningless and ineffective. The BLM does monitor water quality, but no	BLM adheres to Utah's Standard for Rangeland Health which includes indicators for soils, hydrology, and biotic communities. These assessments are conducted on an ecological site scale and then interrelate to an overall landscape function. Also, BLM proactively conducts vegetative trend studies to develop long-term plant community compositions and soil cover, measures precipitation patterns, monitors water resources, conducts utilization rates, and requires actual livestock use. These various assessment tools help make informed adjustments in livestock management practices to improve ecological conditions in areas that have hampered vegetative trends and/or in areas with health standards that are functioning at risk.	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			analysis and trend reports have been forthcoming, even after more than 10 years of monitoring. It appears that the BLM reacts to extreme water quality health standard exceedences only, instead of proactively monitoring trends in order to adjust management and fix problems before they develop. If the BLM is to do what they say in the sentence above then an effective soil monitoring program must be developed and the water quality monitoring program must be analyzed for trends at least every 5 years.	The Environmental Protection Agency has delegated the responsibility under the Clean Water Act to the State of Utah. The BLM manages the public lands so as not to exceed the State of Utah water quality standards. The State identifies trends and waters that are not meeting water quality standards. BLM works with the State of Utah to prioritize areas that need to be monitored to determine if there are potential conflicts with use levels and water quality.	
ECOS Consulting	58	31	Page 4-559, 4th Paragraph: Here it is stated: "Under vegetation decisions impacts common to all alternatives, seed gathering and plan collection would be allowed in all areas meeting Utah's Rangeland Health Standards." Unfortunately, according to Allotment Condition Categories in Appendix D, over 90% of the Monticello Planning Area does not meet Utah's Rangeland Health Standards. Thus, these activities would add additional stress on an already highly stressed system. The BLM must prohibit livestock grazing in areas that cannot sustain livestock grazing, in order to allow seed gathering, plant collection, and other multiple uses. This is the only way to achieve FLPMA's requirement of "sustained yield".	Livestock management will be managed in a sustainable manner and adhere to Utah's Standards for Rangeland Health and Proper Functioning Condition riparian systems. In areas were rangeland health is at risk and livestock are an influencing factor, BLM will implement needed livestock management changes to allow a system to improve. Seed collecting will be limited only to areas that meet these Rangeland Health Standards in order to sustain these communities and not impair landscapes at risk.	No
ECOS Consulting	58	32	The Monticello DRMP/EIS fails to acknowledge and assess the enormous adverse direct, indirect, and cumulative impacts of livestock grazing and OHV routes on the soils, vegetation, stream banks and channels, wildlife and wildlife habitat, and the riparian areas. The BLM must include an in-depth analysis of the historic ecological damage and how it has affected conditions in the field today, and develop preferred future conditions based on the actual potential of these lands. We say that "actual" potential because for too long the BLM has based conditions on how they have been	BLM utilizes Utah's Standards for Rangeland Health to interpret indicators of functionality for a given area. These indicators relate to condition and interactions of soils, hydrologic, and biotic communities of an ecological site, which incorporate various potential impacts. Also, the BLM uses Proper Functioning Condition (PFC) assessments for riparian communities that analyze, in part, stream bank integrity in relation to riparian functionality. These various landscape assessment tools are standard BLM protocol for determining ecological condition and functionality.	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			over the past 120 years, which is probably very different from the actual potential natural condition, due primarily to the short and long-term effects of intensive livestock grazing.		
Thomas Ratcliff	79	1	You provide no MFO allotments map, so the non-local reader/reviewer has no way to know where these "good allotments" are located!	An allotment map with associated names for the Monticello Field Office has been included in the final Resource Management Plan.	Yes
Thomas Ratcliff	79	2	29 allotments are in your "improve" category; "may have serious resource conflicts (again undefined)…or resource production below its potential…can be improved, conflicts resolved through changed grazing strategies or range improvement projects" (which I assume would be "public investments"). NO MFO allotments map---we can't know where they are since we don't live there and know local place names.	An allotment map with associated names for the Monticello Field Office has been included in the final Resource Management Plan.	Yes
Thomas Ratcliff	79	3	At 3.7.2.5 you discuss Ecological Status of the allotments rated on a PCN scale. You'll need to correct some errors that occur in Table 3.13. You show 3.6% of your allotments at PCN. 4 allotments of 73 would be 5.5%; 3 allotments would be 4.1%. 3.6% obviously comes from a different data set!	The percentage figures are based upon an acreage total, not allotment. The title to Table 3.13 has been updated to "Percent of Acres within the Monticello FO Boundaries by Ecological Class."	Yes
Thomas Ratcliff	79	4	Without a MFO allotments map, we cannot properly evaluate the appropriateness of the prescribed grazing season. Similarly, we cannot determine if dormant season grazing (mid-October thru early March, based on our experience in your country) is occurring in big game winter range, or in other crucial habitat where livestock/big game conflicts most likely occur.	An allotment map with associated names for the Monticello Field Office has been included in the final Resource Management Plan. All grazing that occurs in big game winter range is under a deferred rotation system.	Yes
Thomas Ratcliff	79	5	AUM reductions between Alternatives are not significant, ranging from 750 to 940 out of a total program of 78,796 AUMs. (1% decrease at most extreme) The "Livestock Grazing" discussion is simply business as usual. There is no significant change proposed, nor are there significant differences between Alternatives.	An alternative considering the increased allocation of forage to wildlife and other non-consumptive uses was considered for inclusion in the DRMP/DEIS. However, it was eliminated from further analysis; a discussion concerning this alternative has been included in the PRMP/FEIS under Alternatives Considered but Eliminated from Analysis.	Yes

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				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 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.	
Owen Severance	105	2	The DEIS on page 2-17 opens Dark Canyon to grazing by not carrying this restriction forward in other alternatives. Why?	This was an oversight in the DEIS. Clarification has been added to the PRMP/FEIS specifying that Dark Canyon continues to be unavailable for grazing.	Yes
Nick Stevens	115	1	The information in the Draft EIS regarding range management is inadequate. Range allotments are listed	An allotment map with associated names for the Monticello Field Office has been included in the final Resource	Yes

GRA – Livestock Grazing					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			however their physical location is not mapped.	Management Plan.	
Linda Peterson	126	1	Under Alternative C you have eliminated grazing and limited livestock use to trailing in at least four or more canyons. (Moki, Harts, Lake and Indian Creek). Grazing is a traditional, historic use of these canyons. The Proposed RMP does not say why you are closing grazing in these canyons. Although the Proposed RMP does address the socio-economic impact of these closures on the livestock industry in San Juan County as a whole. It did not address the adverse economic or management impact that the closures would have on the individual grazing operators. Studies have show that proper grazing techniques can improve resources even in riparian areas. Grazing in these canyons should not be eliminated.	The BLM does not propose the permanent closure of allotments or portions thereof. However, certain allotments may not be available for grazing over the next 15 years. The allotments considered, as not available are spread by alternative. Subsequent revisions of the land use plan may consider opening these areas to livestock grazing. The vast majority (over 98%) of the Monticello Planning Area is available for livestock grazing. For those limited number of allotments shown on page 2-16 of the DRMP/DEIS the BLM is proposing that other uses of the BLM land are the highest and best use of these areas. Both FLPMA and BLM's Land Use Planning Handbook authorizes BLM to close specific areas to livestock grazing to place an emphasis on these areas for other purposes or values, such as wildlife use, watershed protection, and recreation. As indicated by the variable uses of the BLM lands, as shown in the proposed action, it is BLM's intention to emphasize "multiple use" of the public lands within the planning area. As stated in the DRMP/DEIS (pg. 2-16), for those areas open to livestock grazing, grazing would be managed on an allotment basis according to the Guidelines for Livestock Grazing Management to meet the Standards for Rangeland Health (see Appendix D), including duration and adjustment in season of use. This will provide the manager flexibility to adjust the permitted numbers of livestock, and the season and duration of use on specific allotments after the careful evaluation of monitoring and inventory data in full compliance with appropriate rules and regulations and BLM policy.	Yes
Lynn Patterson	127	1	Under Alternative C you have eliminated grazing and limited livestock use to trailing in at least four or more canyons.	Please refer to response to comment 126-1.	No

GRA – Livestock Grazing					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			(Moki, Harts, Lake and Indian Creek). Grazing is a traditional, historic use of these canyons. The Proposed RMP did not say why you are closing grazing in these canyons. Although the Proposed RMP does address the socio-economic impact of these closures on the livestock industry in San Juan County as a whole, it does not address the adverse economic or management impact that the closures would have on the individual grazing operators. Studies have shown that proper grazing techniques can improve resources even in riparian areas. Grazing in these canyons should not be eliminated.		
Veronica Egan	131	5	Please provide maps with grazing allotment boundaries. It is impossible to determine who the responsible permitee without this information is, and rangeland conditions are generally in "functioning at risk" conditions, at best, on many allotments.	An allotment map with associated names for the Monticello Field Office has been included in the final Resource Management Plan.	Yes
Glen Canyon Institute	222	8	The DRMP allows grazing on 1.6 million acres, or 92 percent of the total planning area (p. 4-70, 4-79, 4-490 to 4-491). In fact, the BLM failed to consider any alternative plan with significantly fewer acres open to grazing - a clear violation of NEPA (p. 4-491).	Please refer to response to comment 058-4.	No

LAR – Lands and Realty					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
National Park Service Intermountain Region	3	5	Commenter assumes that Maps 5 through 9 "Proposed Withdrawals" are showing areas withdrawn from mineral entry as listed on page 2-20.	Commenter's assumptions are correct. Proposed withdrawals shown on Maps 5 through 9 correspond to table 2.1.	No
State of Utah	4	48	ES.4 – Planning Issues – Issue 8 (page ES-3), and; Section 1.3.1.9.4 – Scoping and Identifying Issues, Concern and Opportunities (Page 1-9). The discussions in these sections should contain detailed reference to the issue of inheld state lands within special areas such as WSAs, ACECs, and lands managed for wilderness characteristics. Priority should be given to resolving this issue.	It is not necessary to have this specific language stated in the description of the issue. Please refer to response to comment 004-52.	No
State of Utah	4	52	Section 3.6.2.1 – Land Tenure Adjustments (Pages 3-35) and Section 3.6.2.1.2 – Exchanges (Pages 3-36). These paragraphs should specifically reference the need for Federal acquisition of State school trust lands that are captured by Federal reservations and withdrawals such as wilderness study areas will be a priority, in accordance with applicable BLM policy guidance. In addition State selection should be mentioned as an equally preferred method of land disposition as land exchanges.	Current BLM Utah State Policy is to give priority to State of Utah exchanges and such exchanges do not require a land use planning decision. The Federal Land Policy and Management Act (FLPMA) Section 203 requires the BLM to use the land use planning process to identify lands for disposal through sales. Identifying lands for Section 203 sale requires the BLM to meet certain criteria set out specifically in the Statute. FLPMA allows the BLM to identify lands that would be available for exchange (both disposal and acquisition) more generally. The DRMP/EIS has identified lands generally available for exchange, including identifying State lands that are currently available for acquisition. The DRMP/EIS does not contain a schedule or prioritize these lands, but the BLM understands that State in-lieu and other exchanges are a high priority for the State and for the BLM.	No
State of Utah	4	55	Section 4.3.5.1-Lands and Realty (pgs. 4-63). The first	Narrative has been added to the text on these pages to clarify	Yes

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			paragraph of section 4.3.5.1 (Impacts Common to All Alternatives) incorrectly states that acres within WSAs, the Grand Gulch Special Emphasis area, NSO areas, and areas closed to oil and gas leasing will be excluded to new ROWs. In addition, BLM should note that since such ROWs and accompanying development could degrade wilderness characteristics in WSAs, acquisition of inheld state trust lands by land exchange will be a priority of BLM.	that the BLM has an obligation to grant reasonable access to inheld State lands in WSAs subject to Utah v. Andrus and the Interim Management Policy. Current BLM Utah State Policy is to give priority to State of Utah exchanges and such exchanges do not require a land use planning decision. Please refer to response to comment 004-52.	
State of Utah	4	58	Appendix C Lands and Realty: C.1 Tracts Identified for Disposal. The disposal land list is inadequate to meet the need for BLM to acquire all state trust lands in existing WSAs as well as proposed special designations. The state identified specific lands in these areas to be added to the disposal list.	Current BLM Utah State Policy is to give priority to State of Utah exchanges and such exchanges do not require a land use planning decision. Please refer to response to comments 004-52, 004-55,	No
State of Utah	4	78	The RMP should recognize the opportunity to purchase rights-of-way across properties owned by SITLA to avoid having designated OHV routes closed in the future by the sale of these lands.	As noted in MCA Alternatives (Easements page 2-15), easements would be acquired from willing landowners and the State of Utah to gain access to public lands or placement of facilities on non-public lands, and acquire easements to accomplish resource objectives.	No
San Juan County	7	25	There is no mention of Ute Indian lands in Table 1.1 on pg. 1-2.	That error has been corrected in the PRMP/FEIS.	Yes
Canyon Country Heritage Association	18	9	Commenter asks about a “proposed” OHV trail from Bluff to Butler Wash.	In MFO ID team discussions regarding the travel plan, this issue was identified as a possible conflict as there was some talk of such a proposal. However, no such formal proposal was ever received by the MFO.	No
Utah State Office of Education	31	4	The Planning Issues Identified section should include discussion and detailed reference to the issue of inheld school lands in special designation categories, particularly WSAs, ACECs, and areas to be managed for "wilderness characteristics", and the need to give priority to resolution of the issue.	The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). Information has been added to Chapter 2, Lands and Realty, Management Common to all action alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79).	Yes

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				In addition, the Monticello DRMP/DEIS travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision. Also, please see the revised analysis under Socio-Economics in Chapter 4 of the PRMP/FEIS. Considering lands for WSA or wilderness designation is beyond the scope of BLM's land use planning effort, as identified on pg. 1-12 of the DRMP/DEIS. Those Non-WSA lands that are considered for management of wilderness characteristics were analyzed for the economic effects of that action. For example, on pg. 4-94 of the DRMP/DEIS, the number of oil and gas wells foregone in Alternative B is discussed. The need for BLM to give priority to State-Federal land exchanges has been recognized.	
Public Lands Advocacy	35	11	We are also concerned that the DEIS fails to contain maps depicting the location of all ROW exclusion and avoidance areas by alternative. Maps clearly identifying exclusion and avoidance areas by category need to be included in the FEIS. It is also necessary for BLM to fully disclose the impacts these exclusion and avoidance areas will have on existing and future leases by alternative.	In the PRMP/FEIS, a map of exclusion and avoidance areas has been included. The analysis of the impacts these avoidance and exclusion areas would have on other resources is discussed in Chapter 4 of the PRMP/FEIS.	Yes
IPAMS(Independent Petroleum Assc of Mountain State	55	3	The BLM does not clearly identify which areas it intends to designate as ROW avoidance areas and which areas it intends to designate as ROW exclusion areas. It is not clear whether the BLM intends to designate lands closed for oil and gas leasing as ROW exclusion areas or ROW avoidance areas. IN Chapter 4, Table 4.25 page 4-65 indicates that areas closed to oil and gas leasing will be designated as ROW exclusion areas, while in Chapter 2, page 2-16 it is indicated that areas closed to oil and gas leasing will be designated as ROW avoidance areas. The BLM must reconcile the management prescriptions in Table 2.1 with	BLM has made changes in the document to identify these exclusion and avoidance areas and reconcile inconsistencies.	Yes

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			those set forth in Table 4.25 and clearly identify the ROW avoidance and ROW exclusion areas proposed in the Monticello RMP/EIS. In addition, the DRMP contains inconsistent statements regarding the number of acres that are proposed as ROW exclusion or avoidance areas between Table 4.25 and Table 4.41.		
ECOS Consulting	58	6	BLM fails to explain why the existing and proposed "Right-of Ways" and "Easements" need to be so numerous and wide. The BLM must reveal what the specific plans are for these areas in order for the public to provide informed comments and input. These rights-of-way and easements must be as few and narrow as possible in order to limit widespread land degradation and wildlife habitat fragmentation. A mile wide is too wide; a half mile wide is too wide. The existing rights-of-ways and easements in the Monticello Planning Area are a clear visible example of the direct negative impacts that occur in these areas. They show that surface disturbance and vegetation destruction within the rights-of-way and easements will be pervasive and long-term, and the spread of indirect and cumulative effects on adjacent lands could even be more widespread and serious as they spread to adjacent lands. Indirect impacts include increased erosion, wildlife habitat loss and fragmentation, wind (dust) and soil erosion, invasion of exotic and noxious weeds, destruction of the natural vegetation communities etc. These potential indirect and cumulative impacts must be addressed in detail in the Monticello DRMP/EIS.	Unclear as to what the commenter is referring. A "mile wide" right-of-way could be referring to utility corridors. In the case of utility corridors, ROW corridors were presented as existing groupings of ROWs for electric transmission facilities, pipelines 10 inches and larger, communication lines, federal and state highways, and major county road systems. In the 1999 Western Utility Corridor Study (WUG), the US Highway 191 corridor, the UP&L 345kV line, and the MAPCO/Williams loop pipelines were identified as preferred ROW corridors through the Monticello PA. The West-wide Energy Corridor Programmatic EIS of 2006 identifies corridors through the Monticello FO. Easements would be acquired from willing landowners and the State of Utah to gain access to public lands or placement of facilities on non-public lands, and acquire easements to accomplish resource objectives. This would be done as the need arises. Lands available for ROWs are divided into four categories: 1) Lands within designated transportation and utility corridors, 2) lands outside designated transportation and utility corridors, 3) lands to be avoided and 4)lands to be excluded. Most lands actions are processed by the Monticello Field Office of the BLM; these commonly involve authorizing specific land uses. These actions are considered upon	No

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				application and cannot reasonably be predicted in the RMP. The RMP identifies criteria under which lands actions could be considered. The suitability of a specific tract to meet those criteria would be determined through the site specific NEPA documentation prepared when an action is proposed.	
ECOS Consulting	58	7	There is no information in this DRMP/EIS on the current location and size of Easements and ROW's in the Monticello Planning Area. This information must be included in order for decision makers and the public to assess their actual and potential ecological impacts. The BLM must also include information on reasonably foreseeable future ROW and Easement plans and projected needs within the Monticello Planning Area. And the BLM must provide an adequate NEPA analysis of the past and present impacts of ROW's and Easement within the Monticello Planning Area.	Please refer to response to comment 58-6.	No
EOG Resources	60	2	Section 204 of FLPMA requires that 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. 43 U.S.C 1714 (2006). Because Alternatives B, C, and E propose to close Areas of 5,000 acres or more to mineral development, they must comply with section 204 of FLPMA. 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. 43 U.S.C. 1714(A) (2006). See Monticello DRMP/EIS, pg. 4-98, Table 4.41. To date, the Department of the Interior has not complied with the requirements set forth in section 204 of FLPMA.	The commenter is correct in stating that Section 204 of FLPMA outlines the procedures to be followed by the Secretary of the Interior in withdrawing lands from the operation of the public land laws. The Secretary may initiate withdrawals on his own motion or act on applications for withdrawals from agencies under his jurisdiction. Planning guidance for BLM includes direction to consider proposals for withdrawals in the land use planning process. Such consideration may result in a recommendation for withdrawal being made in the RMP. This is the first step in the withdrawal process. It should be understood that BLM only makes recommendations for withdrawals which would be followed with an application for withdrawal to the Secretary. All procedures outlined in Section 204 of FLPMA would then be followed by the Secretary as to processing of withdrawal applications.	No
EOG Resources	60	15	On page 2-15, the BLM identifies the following Management Common to All Alternatives: ROWs for state and private inholdings, in-field oil and gas leases, and pipelines for	Please refer to response to comment 60-46.	No

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			producing oil and gas wells would be approved subject to a determination of 'reasonable' access for the 'intended purpose' and they are processed and issued upon application." See Monticello DRPM/EIS, pg. 2-15, Table 2.1. EOG objects to the BLM's attempt to create a new standard governing when it may issue a ROW. The Mineral Leasing Act, FLPMA, their implementing regulations, and the BLM ROW Manual provide the BLM with standards for determining when the agency may grant a ROW. 30 U.S.C. 185 (2006); 43 U.S.C. 1761(a) (2006); 43 C.F.R. part 2800 (2007); 43 C.F.R. part 2880 (2007); BLM Manual 2801, Rel. 2-253 (3/8/89); BLM Manual 2880. he BLM may not deviate from the terms of this guidance or attempt to legislate a new standard for granting ROWs. The BLM must revise this sentence to be consistent with existing authority governing the issuance of ROWs.		
EOG Resources	60	16	On page 2-16, under Management Common to All Action Alternatives, the BLM proposes to create significant ROW exclusion and avoidance areas. See Monticello DRMP/EIS, page 2016, Table 2.1. The Monticello DRPM/EIS, however, contains conflicting information about which areas the BLM intends to designate as avoidance areas and which areas it intends to designate as exclusion areas. On page 2-16, Table 2.1, the BLM identifies areas designated as NSO, unavailable for leasing, or VRM Class I as ROW avoidance areas. In Chapter 4 of the Monticello DRMP/EIS, however, the BLM identifies areas unavailable or closed for leasing as ROW exclusion areas. See Monticello DRPM/EIS, pg 4-65, Table 4.25. The BLM must clearly identify areas it intends to designate as ROW avoidance and exclusion areas, and resolve inconsistencies in the Monticello DRMP/EIS.	The proposed final EIS has a list of avoidance and exclusion areas. Right-of-way (ROW) avoidance and exclusion areas would generally be consistent with the stipulations identified in Appendix A for oil and gas leasing and other surface-disturbing activities. These stipulations have been developed to protect important resource values. Areas identified as NSO are open to oil and gas leasing but surface disturbing activities cannot be conducted on the surface of the land. Access to oil and gas deposits would require horizontal drilling from outside the boundaries of the NSO areas. NSO areas are avoidance areas for ROWs; no ROW would be granted in NSO areas unless there are no feasible alternatives. A map showing those areas is included in the proposed final EIS.	No
EOG Resources	60	44	The BLM does not clearly identify which areas it intends to designate as ROW avoidance areas and which areas it intends to designate as ROW exclusion areas. Specifically,	Please refer to response to comment 60-16.	No

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			it is not clear whether the BLM intends to designate lands closed for oil and gas leasing as ROW exclusion areas or ROW avoidance areas. In Chapter 2, however, the BLM states that areas closed to oil and gas leasing will be designated as ROW avoidance areas. See Monticello DRMP/EIS, pg. 2-16, Table 2.1 In Chapter 2, however, the BLM states that areas closed to oil and gas leasing will be designated as ROW avoidance areas. See Monticello DRMP/EIS, pg. 2-16, Table 2.1 ("Areas NSO or unavailable for leasing or VRM Class I are ROW-avoidance areas.") The BLM must reconcile the management prescriptions in Table 2.1 with those set forth in Table 4.25 and clearly identify the ROW avoidance and ROW exclusion areas proposed in the Monticello RMP/EIS.		
EOG Resources	60	45	The Monticello DRMP/EIS contains inconsistent statements regarding the number of acres that are proposed as ROW exclusion or avoidance areas. In Chapter 4, Table 4.25 asserts that, under Alternative B, areas closed to oil and gas leasing would be designated as ROW exclusion areas. Table 4.25 then provides that ROW exclusion areas under Alternative B will encompass 416,612 acres. Under Alternative B, however, the BLM proposes to close 425,179 acres--not 416,612 acres--to oil and gas leasing. See Monticello DRMP/EIS, pg. 100, Table 4.41. The BLM must revise Table 4.25 to ensure it accurately reflects the number of acres that will be designated as ROW avoidance and exclusion areas under each alternative.	Please refer to response to comment 60-16.	No
EOG Resources	60	46	The BLM has not adequately analyzed the impacts ROW avoidance and exclusion areas will have upon existing oil and gas leases. On page 4-65, the BLM devotes a single paragraph to the impacts of ROW management under all of the action alternatives. The BLM summarizes the differences between the alternatives by explaining, "As the number of acres of land that are exclusion areas increase,	Regardless of the alternative selected, valid existing rights and ROW will be granted regardless. Upon implementation of the RMP, new leases would not have access to ROW in the exclusion areas. However, in most cases the ROW exclusion areas are located in areas closed to oil and gas leasing or NSO and therefore are not likely to substantial adverse impacts on oil and gas development in the planning area. See	No

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			the likelihood for adverse impacts would increase because the increasing limitations on ROW placement." Monticello DRMP/EIS, pg. 4-66. This statement understates the dramatic differences between the number of acres proposed as ROW avoidance or exclusion areas under Alternative A, the No Action Alternative, and Alternative E. According to Table 4.25, Alternative E proposes to designate nearly one million acres as ROW exclusion areas, as compared to the 385,316 acres proposed under Alternative A. By designating such large areas as ROW exclusion areas, the BLM would prohibit ROW across large swaths of the resource area. The BLM fails o present any analysis of the impacts the specific ROW exclusion areas proposed under Alternative E would have on current and future development in the Monticello RA.	also response to comment 60-51.	
PacifiCorp	61	1	PacifiCorp has concerns about locating Utility Rights of Way adjacent to existing facilities without requiring a minimum distance between the facilities in order to address potential safety and reliability issues. Recommended Revision/Action PacifiCorp recommends that the EIS and final RP include guidelines for ROW clearance. We recommend that there be a minimum distance of 50 feet between distribution lines. These buffers zones are necessary to protect against natural and man caused events that can result in a loss of service.	The RMP adopts the West-wide Energy Corridor Programmatic EIS for guidance and NEPA in utility facilities within the existing corridors. Your comments should have been addressed during that EIS process. Any additional facilities within these utility corridors could include provisions for distance requirements from existing facilities.	No
PacifiCorp	61	2	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.	This is outside the scope of the RMP. It should be included as part of the contingency plan for authorizations from BLM to PacifiCorp. Emergency access as well as access for routine maintenance should be included in the right-of-way grants.	No

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Recommended Revision/Action The EIS and RMPs should include the definition of an Electrical Emergency Condition. As defined in PacifiCorp's ROW grants with the BLM, an "Electrical Emergency Condition" is a condition or situation that is imminently likely to endanger life or property or that is imminently likely to cause a material adverse effect on the security of, or damage to, PacifiCorp's electrical system. The EIS and RMPs should make it clear that PacifiCorp has the right to enter transmission and distribution lines via mechanized vehicles for routine operation and maintenance, emergency situations (power outages), and for conducting line patrols. Our employees need to be able to do emergency work anywhere it is necessary, at any time.	Page 4-420 of the plan states: (2) actions associated with emergency or public safety would be performed at the discretion of the Authorized Officer. Commercial users of public lands typically have a procedure within their emergency contingency plan to deal with emergencies.	
CrownQuest	62	7	Because closing such large areas to oil and gas leasing constitutes a withdrawal, the Department of the Interior will be required to comply with the procedural provisions of section 204 FLPMA.	Withdrawals are formal actions that set aside, withhold, or reserve federal land by statute or administrative order for public purposes. Withdrawals accomplish one or more of the following: • Close (segregate) federal land to operation of all or some of the public land laws and/or mineral laws. • Dedicate federal land to a specific purpose. Withdrawals segregate a particular portion of public lands, suspend operation of the public land laws. Withdrawals only apply to the general land laws which include the Mining Law of 1872, as amended. The action alternatives do propose removing areas from mineral leasing which is discretionary and does not require a withdrawal.	No
CrownQuest	62	18	The Monticello DRMP/EIS, contains conflicting information about which areas the BLM intends to designate as avoidance areas and which areas it intends to designate as	The Proposed Plan/Final EIS has a list of avoidance and exclusion areas. Right-of-way (ROW) avoidance and exclusion areas would generally be consistent with the	Yes

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			exclusion areas. On page 2-16, Table 2.1, the BLM identifies areas designated as NSO, unavailable for leasing, or VRM Class I as ROW avoidance areas. In Chapter 4 of the Monticello DRMP/EIS, however, the BLM identifies areas unavailable or closed for leasing as ROW exclusion areas. See Monticello DRPM/EIS, pg 4-65, Table 4.25. The BLM must clearly identify areas it intends to designate as ROW avoidance and exclusion areas, and resolve inconsistencies in the Monticello DRMP/EIS.	stipulations identified in Appendix A for oil and gas leasing and other surface-disturbing activities. These stipulations have been developed to protect important resource values. Areas identified as NSO are open to oil and gas leasing but surface disturbing activities cannot be conducted on the surface of the land. Access to oil and gas deposits would require horizontal drilling from outside the boundaries of the NSO areas. NSO areas are avoidance areas for ROWs; no ROW would be granted in NSO areas unless there are no feasible alternatives. Areas closed to leasing are ROW exclusion areas.	
CrownQuest	62	20	Although the BLM has mapped some ROW exclusion and avoidance areas under different headings, such as oil and gas leasing stipulations, the BLM did not provide maps that exclusively identified all ROW exclusion and avoidance areas.	The Proposed Plan Final EIS contains maps showing the avoidance and exclusion areas.	Yes
CrownQuest	62	63	The BLM fails to disclose the significant, adverse impacts to minerals and energy resources in Table 2.2 from the BLM's proposed ROW avoidance and exclusion areas as management for the resource Lands and Realty. See Monticello DRMP/EIS, pgs. 2-82 - 2-86, Table 2.2.	The Proposed Plan/Final EIS has a list of avoidance and exclusion areas. Right-of-way (ROW) avoidance and exclusion areas would generally be consistent with the stipulations identified in Appendix A for oil and gas leasing and other surface-disturbing activities. These stipulations have been developed to protect important resource values. Areas identified as NSO are open to oil and gas leasing but surface disturbing activities cannot be conducted on the surface of the land. Access to oil and gas deposits would require horizontal drilling from outside the boundaries of the NSO areas. NSO areas are avoidance areas for ROWs; no ROW would be granted in NSO areas unless there are no feasible alternatives. Areas closed to leasing are ROW exclusion areas. Areas of avoidance and exclusion are based on need for protection for lands with special resources such ACECs or	No

LAR – Lands and Realty					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				recreation sites. The impacts from these protective measures are discussed under the Special Designations section.	
CrownQuest	62	80	The BLM does not clearly identify which areas it intends to designate as ROW avoidance areas and which areas it intends to designate as ROW exclusion areas. Specifically, it is not clear whether the BLM intends to designate lands closed for oil and gas leasing as ROW exclusion areas or ROW avoidance areas. In Chapter 4, Table 4.25 represents that areas closed to oil and gas leasing will be designated as ROW exclusion areas. See Monticello DRMP/EIS, pg 4-65, Table 4.25. In Chapter 2, however, the BLM states that areas closed to oil and gas leasing will be designated as ROW avoidance areas. See Monticello DRMP/EIS, pg. 2-16, Table 2.1 ("Areas NSO or unavailable for leasing or VRM Class I are ROW-avoidance areas,"). The BLM must reconcile the management prescriptions in Table 2.1 with those set forth in Table 4.25 and clearly identify the ROW avoidance and ROW exclusion areas proposed in the Monticello RMP/EIS.	Please refer to response to comments 62-18 and 62-20.	No
CrownQuest	62	81	Additionally, the Monticello DRMP/EIS contains inconsistent statements regarding the number of acres that are proposed as ROW exclusion or avoidance areas. In Chapter 4, Table 4.25 assets that, under Alternative B, areas closed to oil and gas leasing would be designated as ROW exclusion areas. Table 4.25 then provides that ROW exclusion areas under Alternative B will encompass 416,612 acres. Under Alternative B, however, the BLM proposes to close 425,179 acres--not 416,612 acres--to oil and gas leasing. See Monticello DRMP/EIS, pg 100 Table 4.41. The BLM must revise Table 4.25 to ensure it accurately reflects the number of acres that will be designated as ROW avoidance and exclusion areas under each alternative.	Please refer to response to comments 62-18 and 62-20.	No

MLO – Minerals and Energy—Locatable					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
U.S. Fish and Wildlife Service	2	37	Page 4-575 in Table 4.204. The table only depicts the number of acres of surface disturbance for oil and gas development (the following table includes geophysical exploration). Throughout the document, including this section, oil and gas has been included under the "Minerals" section which includes a number of other activities such as coal, tar sands, potash and salt, and uranium. Including acres in the tables for only oil and gas and for exploration within the "Minerals" section underestimates the total number of acres of surface disturbance. Acres of surface disturbance for other "Minerals" activities should be estimated and presented in this section.	Changes have been made to the document to analyze other mineral activities.	Yes

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
U.S. Fish and Wildlife Service	2	19	Page 4-88 in Section 4.3.7.4. It states that there would be approximately 886 acres of new disturbed land resulting from 2-D and 3-D geophysical exploration which would be reclaimed within 10 years. The acres should be reclaimed within 1 or 2 years, rather than waiting 10 years.	Reclamation will be initiated immediately upon project completion. However, successful reclamation, including re-establishment of vegetation, usually takes several years depending on specific ecological site conditions such as, precipitation, soil type, temperature, slope aspect, elevation and vegetation type.	No
U.S. Fish and Wildlife Service	2	38	Page 4-575 in Table 4.204. The total number of acres of surface disturbance for the preferred alternative is 710 acres. On page 3-54, the document mentions 1,872 acres related to oil and gas and later states "the total cumulative surface disturbance for wells in the Monticello PA during the life of this plan is projected to be approximately 12,317 acres." The 710 acres may be a low estimate.	Acreages are based on the RFD projections of oil and gas activity in the planning area for the next 15 years. The planning area includes approximately 3.6 million acres of non-BLM lands. The 12,317 acre figure represents the total net surface disturbance for all lands in the planning area. This figure is derived by taking the sum of the estimated existing surface disturbance and the estimated future surface disturbance, then subtracting the total predicted acres to be reclaimed during the next 15 years. The 1,872 acre figure is the total estimated future disturbance for all lands in the planning area. The 710 acres referred to in table 4.204 is just the total of estimated future disturbance on BLM lands prorated by various habitat types. These acreages are explained in section 4.1.2 and tables 4.1 through 4.5.	No
State of Utah	4	30	The RFD for fluid minerals does not clearly state whether its projections are limited to exploration, or include possible subsequent development based on likely discoveries.	The RFD includes projections for development and production activity. Page 1, 3rd paragraph, states “It was assumed that 59% of the wells drilled would be productive…It is also reasonable to assume that the number of wells to be abandoned…will equal approximately one-half the number of wells going into production”. Page 2, paragraph 1, states	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				"RFD …is a long-term projection of oil and gas exploration, development, production, and reclamation activity". The narrative on Pages 13 and 14 of the RFD describes the associated disturbances which were factored into the average acreage of surface disturbance per well (9.6 acres), including areas needed for associated production activities such as gas production facilities, oil storage tanks, gathering/injection pipelines and roads.	
State of Utah	4	31	The state encourages BLM to prepare a detailed transportation system use analysis as part of the RFD, similar to the UDOT's "Analysis of Freight Traffic Associated with Oil and Gas Development in the Uinta Basin".	The BLM acknowledges that a transportation system use analysis can be a useful tool in assessing impacts from oil and gas development. However, the benefit of a transportation analysis is much greater for areas such as the Uintah Basin which have a high level of current and projected oil and gas activity. In comparison, the projected activity levels for the Monticello Field Office are relatively low. The Monticello Field Office prepared a Reasonably Foreseeable Development (RFD) scenario for oil and gas development over the next 15 years. The development predicted in the RFD was utilized to generate the economic impacts in the Draft RMP/EIS as detailed on pg. 4-340 through 4-344.	No
State of Utah	4	49	Section 1.3.4 – Development of Planning Criteria/Legislative Constraints (page 1-12). The BLM states that the RMP will "apply only to public lands and, resources managed by the BLM". The BLM should reconsider whether it can impose its standard on split estate lands where it does not own the surface.	Information regarding leasing and development on split estate lands is found at the following Washington Office website: www.blm.gov/bmp/Split_Estate.htm. Instruction Memorandum No. 2003-202 outlines the policy, procedures and conditions for approving oil and gas operations on split-estate lands. In particular, the BLM will not consider an Application for Permit to Drill or a Sundry Notice administratively or technically complete until the Federal lessee or its operator certifies that an agreement with the surface owner exists, or until the lessee or its operator complies with Onshore Oil and Gas Order No. 1. Compliance with Onshore Oil and Gas Order No. 1 requires the Federal	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				mineral lessee or its operator to enter into good-faith negotiations with the private surface owner to reach an agreement for the protection of surface resources and reclamation of the disturbed areas, or payment in lieu thereof, to compensate the surface owner for loss of crops and damages to tangible improvements, if any. In addition, the BLM will invite the surface owner to participate in the onsite inspection and will take into consideration the needs of the surface owner when reviewing the Application for Permit to Drill. The BLM will offer the surface owner the same level of surface protection BLM provides on Federal surface (Instruction Memorandum No. 89-201). Table 2.1, Page 2-18 (last paragraph) clarifies BLM's intent concerning management of split estate lands in the Monticello Field Office. On split estate lands, lease stipulations would consist only of those necessary to comply with non-discretionary federal laws, such as the Endangered Species Act. Discretionary measures to mitigate impacts to other resources, such as visual and wildlife, would not be applied as a lease stipulation but would be developed during site specific environmental analysis and would be attached as conditions of approval (COA) in consultation with the surface owner and consistent with lease rights.	
State of Utah	4	74	The Draft RMP/DEIS for both the Kanab and Richfield field offices assess cumulative timing limitations and their impact on oil and gas exploration and development for each alternative by classifying BLM administered lands into one of seven categories (i.e., Standard lease terms, controlled surface use, cumulative timing limits less than three months in duration, cumulative timing limits between three and six months in duration, cumulative timing limits between six and nine months in duration, areas subject to NSO stipulations, and areas unavailable for leasing). The state strongly	In accordance with IM 2003-233, lease stipulation categories used by the Monticello Field Office are consistent with the Uniform Format for Oil and Gas Lease Stipulations prepared by the Rocky Mountain Regional Coordinating Committee in March 1989.	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			encourages BLM to complete a similar analysis as part of the Monticello RMP/EIS and for all other RMPs within the State of Utah.		
Spear	19	1	Commenter states: You have many designations to enhance wildlife and cultural resources but have failed to consider even one as designated for mineral development. Suggest that one area be designated for mineral exploration and development	As stated in Table 2.1 - Mineral Resources, Management Common to All Alternatives - all BLM administered lands in the planning area are available for leasing subject to standard lease terms, unless otherwise specified in the plan. Under the Proposed Plan, leasing and mineral material disposal would be allowed with standard conditions on lands totaling 495,431 acres and 624,734 acres, respectively. In addition, 1,734,458 acres would be available for mineral entry and only 50,665 acres would be recommended for withdrawal.	No
Southern Utah Wilderness Alliance	26	34	The BLM must consider a no leasing 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 (See, e.g., Bob Marshall Alliance v. Hodel, 852 F.2d 1223, 1228 [9th Cir. 1988].	The BLM has inserted additional text in the proposed plan to address this issue. Refer to pg. 101, table 2.3, Alternative Elements Eliminated from Detailed Analysis.	Yes
Southern Utah Wilderness Alliance	26	82	The BLM must consider a no leasing alternative.	Please refer to response to comment 026-34.	Yes
Public Lands Advocacy	35	1	There is no mention of the need for petroleum resource development to meet the Nation's increasing demands for energy. Nor is there mention of the need to address the impact of surface management decisions on access to public lands for energy development or the fact that valid existing lease rights existing with the planning area. The Planning Criteria are equally silent on these issues.	Table 2.1, Mineral Resources states one of BLM's goals is to meet local and national energy and other public mineral needs to the extent possible. Valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria and as outlined in the BLM's Land Use Planning Manual	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			In general, the procedures required to handle oil and gas considerations in planning are outlined in the BLM's 1624 Manual Supplemental Program Guidance (SPG) for fluid minerals. It is, therefore, necessary to include the basic elements of the SPG as planning criteria. The SPG also elevates mineral resources to an equal level with all other resource values. Hence, it is necessary for these resources to be represented equitably in not only the planning criteria, but also factors which will be considered by alternative, effects to be addressed in the analysis of environmental consequences and determinations used to select a preferred alternative.	(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. Consistent with Supplemental Program Guidance (SPG) for Fluid Minerals, the BLM prepared an RFD scenario in support of the land use planning process. The RFD assumptions and baseline projections form the basis for analyzing impacts.	
Public Lands Advocacy	35	2	On Page 1-12, The DEIS indicates in its planning criteria that valid existing rights would be recognized. We are concerned that no explanation of what constitutes valid existing rights and how they relate to new land use decisions has been provided. We recommend that BLM clearly state in the Final EIS that the new restrictions proposed in the Preferred Alternative will not apply to lands already under oil and gas lease. It must be made clear that BLM has no authority to impose these new restrictions through Conditions of Approval (COA) on applications for permit to drill (APD) if they would abrogate the valid existing lease rights. Such qualifiers are consistent with current rules and policies of the BLM and must be clearly disclosed in the planning documents.	Valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria 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. As pertaining specifically to oil and gas leases, table 2.1, pg.	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				2-18 states "Oil and gas leases issued prior to the plan would continue to be managed under the stipulations in effect when issued. Those issued subsequent to this plan would be subject to the stipulations developed in this plan."	
Public Lands Advocacy	35	3	Under EPCA BLM is required to identify impediments to oil and gas development. It was the intent of Congress that access to energy resources be improved as indicated in the Energy Policy Act and Conservation Act of 2000 and the Energy Policy Act of 2005. BLM recognized the intent of the both Phases I and II of the EPCA review. As such, under Instruction Memorandum 2003-233, Integration of the Energy Policy and conservation Act (EPCA) Inventory Results into the Land Use Planning Process, the MFO 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 using the planning process. Since the purpose of integrating the EPCA results into planning is intended to determine whether existing resource protection measures are inadequate, adequate or excessive, we recommend the MFO reevaluate its management decisions accordingly, particularly with respect to seasonal restrictions to protect wildlife.	BLM considered the information in the EPCA study. The EPCA Study was done on a regional basis (EPCA Basins). BLM's review of its current oil and gas stipulations (Alternative A) and its analysis of various alternative levels of restrictions provides a more detailed approach in considering the nature of restrictions or impediments to the development of oil and gas resources in the Monticello planning area. The analysis in Chapter 4 of the DRMP/EIS considers the impacts of restrictive stipulations on oil and gas development. The preferred alternative (Alt C) imposed the least restrictive stipulations necessary to protect the resources of concern while still allowing oil and gas development.	No
Public Lands Advocacy	35	5	Upon review of the Mineral Potential Report, industry is concerned the RFD scenario for the Monticello FO is low, especially for the Blanding Sub-basin and the Paradox Fold and the Fault Belt where BLM agrees there is high potential for the recovery of oil and gas resources. Given the increased interest in the MFO by the energy industry and technological improvements available, we believe the potential for 195 wells, 74 on public land, over the next 15 years is inadequate. We recognize that the data used to	The RFD was prepared in accordance with BLM Washington Office IM 2004-89. The RFD scenario is an analytical model, which estimates oil and gas activity that could potentially occur. The RFD scenario is a reasonable technical and scientific approximation of anticipated oil and gas activity based on the best available information, including the potential for oil and gas resource occurrence, past and present oil and gas activity in conjunction with other significant factors such as economics, technology, and	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			construct the RFD was based upon past activities. However, given technological advances with respect to development of natural gas from shale, we also urge BLM to reevaluate its well projections for those areas.	physical limitations on access, existing or anticipated infrastructure, and transportation. The RFD is purely an estimate; it is not a decision document nor does it establish a limiting threshold for future Federal leasing, exploration, or development activities. Rather, it is a scenario or projection of actual and hypothetical oil and gas activities based on the specific circumstances or constraints associated with each alternative and corresponding mitigation measures. This hypothetical framework focuses the impact analysis associated with oil and gas leasing and allows BLM to do a comparative analysis of management alternatives. Because the calculations are based on variables or factors that are difficult to accurately determine, the projection of oil and gas wells can vary greatly. These variables or factors include the price of oil and gas, the success or failure of exploration in unproven areas, and the willingness of investors to invest their money in risky exploration for oil and gas in unproven areas. As project-specific drilling operations are being considered, the BLM performs a land use plan conformance review and determination of NEPA adequacy. If conditions change, the BLM may need to perform further NEPA analysis in either an environmental assessment or an environmental impact statement. A land use plan amendment would not be required.	
Public Lands Advocacy	35	6	Acquisition of geophysical data is crucial to ensuring the energy industry's ability to more clearly focus on those areas with high potential for petroleum resources. In areas where this scientifically valid approach has been employed, it has been demonstrated that fewer wells are actually required to locate and produce the targeted resource due to improved	The analysis assumptions for oil and gas development on pg. 4-3 of the DRMP/EIS are based on surface disturbance associated with projected linear miles of geophysical source lines. This level of impact analysis is appropriate for land use planning. This is not a worst case scenario but provides a comparison of the impacts across the alternatives. This	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			subsurface structure resources. Moreover, advances in technology have evolved to the point where surface disturbance from 3D geophysical activity is nearly eliminated and any residual disturbance is certainly very short term in nature. With today's technology, few impacts are expected because no new roads or other facilities are required for completion of a geophysical project. Nowhere are these purported impacts projected in Table 4-5 described in the DEIS, even in Appendix A.	comparison of impacts for the alternatives is provided on Table 4.5. More detailed analysis of impacts and mitigation are considered for site specific proposals after completion of the land use plan.	
Public Lands Advocacy	35	7	We understand BLM's attempt to determine the number of linear miles and acres that could be subject to geophysical exploration activities over the life of the plan. However, the assumption of acreages to miles is significantly exaggerated. There are 43,560 square feet in an acre. Therefore 1230 linear miles of 12 foot wide travel paths (for a vibrator) at 5280 feet per mile equals 1,789 acres. For a buggy drill at a 10 foot wide path (they are 8 feet wide) it is 1490 acres. The distinction must be made between the types of energy source being proposes; vibroseis, buggy drill or heliportable drill.	In its RFD, the BLM predicted that a total of 1230 linear miles of source line (vibrator and buggy drills) would be completed in the Monticello Field Office planning area during the next 15 years. An average disturbance width of 15 feet was assumed. This gives an estimated total surface disturbance of 2,236 acres. The purpose of the RFD is to allow the BLM to make reasonable assumptions about future activity so that a comparative analysis of impacts can be done between alternatives. The difference between a 12 feet or 15 feet assumed disturbance width (447 acres total or 170 acres on BLM land) would not change the relative analysis appreciably, provided the assumptions remain constant between alternatives. More detailed analysis of impacts and mitigation are considered for site specific proposals after completion of the land use plan	No
EOG Resources	60	4	Page ES-7 contains Table ES6 which sets forth the numbers of acres that are open to oil and gas leasing with standard terms, open to leasing subject to stipulations, and closed to leasing under each of the alternatives in Monticello DRMP/EIS. Table ES6 represents that 213,288 acres will be open for leasing with standard lease terms and figures elsewhere in the Monticello RMP. For example, on page 4-	The BLM has revised its acreage calculations to reflect the changed management prescriptions in the proposed plan.	Yes

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			98, Table 4.41 represents that 213,290 acres will be open for leasing with standard lease terms and 974,463 acres will be closed to leasing under Alternative E. The BLM must reconcile its acreage figures in the final Monticello RMP.		
EOG Resources	60	8	The Energy Policy Act of 2005 further required the BLM and Forest Service to ensure that lease stipulations are applied consistently, coordinated between the agencies, and only as restrictive as necessary to protect the resource for which the stipulations are applied.. Energy Policy Act of 2005, Pub. L. No. 109-58, 363, 119 Stat. 594, 722-23 (2005) (emphasis added) When developing the Monticello RMP the BLM must ensure that any and all stipulations developed for future leasing with the Monticello RA are the least restrictive possible, in accordance with Congress' mandate.	The BLM recognizes its requirement to apply the least restrictive stipulations necessary to accomplish the desired resource protection, as stated in Table 2.1, Mineral Resources, Management Common to All Alternatives. The analysis in Chapter 4 of the DRMP/EIS considers the impacts of restrictive stipulations on oil and gas development. The preferred alternative (Alt C) imposed the least restrictive stipulations necessary to protect the resources of concern while still allowing oil and gas development.	No
EOG Resources	60	9	When developing stipulations on leases, the BLM must acknowledge that it cannot modify existing stipulations or impose new stipulations on leases. See Monticello DRMP/EIS, pg. 2-4. The BLM cannot adjust a lessee's valid and existing rights. Congress made it clear when it enacted FLPMA that nothing therein, or in the land use plans developed there under, was intended to terminate, modify, or alter any valid or existing property rights. See 43 U.S.C. 1701 note (2006). The BLM must include a statement on page 2-4 expressly acknowledging the limits of its authority to develop stipulations on leases.	Please refer to response to comment 035-2.	No
EOG Resources	60	17	See DOI Manual, Chapter 11.9(6), (516 DM 11.9(b)). 72 Fed. Reg. 45504, 45539 (Aug. 14, 2007). The BLM determined that geophysical operations on federal lands should normally be approved by the BLM with a categorical exclusion from NEPA documentation given the limited and temporary impacts associated with such activities. The BLM should ensure that the language in the Monticello RMP, when revised, allows the BLM sufficient flexibility to approve	Implementation of BLM policy or compliance with federal law, rule, or regulation is considered administrative actions which do not require a planning decision.	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			geophysical activities using the newly revised Department of the Interior manual.		
EOG Resources	60	18	Alternative E, in particular, is inconsistent with the National Energy Policy and Executive Order 13211, 13212, and 13302. The removal of vast areas of land from future oil and gas development and potential restrictions on both leasing and development under Alternative E would significantly restrict regional earnings, jobs, and tax revenue. According to the information presented in the Monticello DRMP/EIS, the adoption of Alternative E would reduce the number of wells that could be drilled in the Monticello RA by over 26% compared to the Alternative A, the No Action Alternative. See Monticello DRMP/EIS, pg. 4-136. Annual revenue from potential oil and gas production would also be reduced under Alternative E. See Monticello DRMP/EIS, pg. 4-344. The BLM cannot adopt an alternative that would reduce economic development, decrease domestic energy supplies, and harm the local tax base.	The DRMP/DEIS in Chapter 4, page 100, states: " In accordance with BLM policy and its recognition of the National Energy Policy and Conservation Act of 2000 (EPCA), as discussed in Chapters 2 and 3, mineral resource development would be allowed throughout the planning area subject to standard terms and conditions, unless precluded by other program prescriptions, as specified in the RMP." The BLM expects that energy resource contributions in the Monticello Field Office will be very small relative to national production or even State production. Moreover, The BLM does not expect to see significant energy development (such as that experienced in Uintah Basin or parts of Wyoming) in the planning area over the next 15 years 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. The BLM has expanded its discussion of fiscal impacts to state and local governments in Chapter 4 of the DRMP/DEIS. See also responses to comments 55-5, 60-52 and 62-64.	Yes
CrownQuest	62	1	The BLM must ensure compliance with the Energy Policy Act of 2005, EPCA, the National Energy Policy, and Executive Order Number 13212, 66 Fed. Reg. 28357 (May 18, 2001), to reduce rather than increase impediments to federal oil and gas leasing.	In accordance with the Energy Policy and Conservation Act, the restrictions on oil and gas leasing developed in the DRMP/EIS for the preferred alternative (Alt C) are the least restrictive stipulations necessary to protect the resources under consideration. See Table 4.4. of the DRMP/EIS (on pg. 4-5) for a summary of wells foregone due to restrictions on oil and gas leasing by alternative. The impacts of each of the restrictions on oil and gas development are detailed in	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				Chapter 4 of the DRMP/EIS. The BLM has identified Alt C as the preferred alternative, which the BLM contends reaches a balance between resource protection and resource production. The BLM has proposed restrictions in Alt. C to protect resource values. These restrictions represent the minimal necessary to protect these values. Please also refer to response to comment B60-18.	
CrownQuest	62	3	As development operations are proposed on these leases in the future, the BLM cannot attempt to impose stipulations or conditions of approval (COAs) on CrownQuest's existing leases that are inconsistent with its valid existing contractual rights. Once the BLM has issued a federal oil and gas lease without a no surface occupancy stipulation (NSO), and in the absences of a nondiscretionary statutory prohibition against development, the BLM cannot completely deny development on the leasehold, nor impose mitigation measures inconsistent with the BLM's authority under 43 C.F.R. 3101.1-2.	Valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria 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. Please also refer to response to comment 035-2.	No
CrownQuest	62	4	The BLM cannot adjust CrownQuest's valid and existing rights. Congress made clear when it enacted FLPMA that nothing therein, or in the land use plans developed there under, was intended to terminate, modify, or alter any valid or existing property rights. See 43 U.S.CS 1701 note (2006).	Valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria 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	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				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.	
CrownQuest	62	8	Pages ES-7 contains Table ES6, which sets forth the numbers of acres that are open to oil and gas leasing with standard terms, open to leasing subject to stipulations, and closed to leasing under each of the alternatives in the Monticello DRMP/EIS. Table ES6 represents that 213,288 acres will be open for leasing with standard lease terms and 971,463 acres will be closed to leasing under Alternative E. These figures conflict with figures elsewhere in the Monticello RMP. For example, on page 4-98, Table 4.41 represents that 213,290 acres will be open for leasing with standard lease terms and 974,463 acres will be closed to leasing under Alternative E. The BLM must reconcile its acreage figures in the final Monticello RMP.	Please refer to response to comment 060-4.	No
CrownQuest	62	10	The BLM indicates in Section 1.4.4 of the Monticello DRMP/EIS that it integrated the general principles from the EPCA Study into the Monticello RMP revision. See Monticello DRMP/EIS, pg 1-16. The BLM should also carefully review the results and analysis contained in the Scientific Inventory of Onshore Federal Land's Oil and Gas Resources and the Extent and Nature of Restrictions or Impediments to Their Development (2006) (EPCAII) prepared in compliance with section 604 of the Energy Act of 2000, Pub. L. No. 106-469, and section 364 of the Energy Policy Act of 2005, Pub. L. No. 109-58.	Please refer to response to comment 035-3.	No
CrownQuest	62	11	The BLM references a Memorandum of Understanding between the BLM and the United States Department of Agriculture, Forest Service (Forest Service) establishing joint	Section 1.4.6 has been revised in the proposed plan to explain the purpose of the MOU in more detail.	Yes

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			BLM and Forest Service procedures for managing oil and gas leasing and operational activities. See Monticello DRMP/EIS, pg 1-16. The BLM should explain in greater detail the purpose and effect of this Memorandum of Understanding		
CrownQuest	62	24	Alternative E, in particular, is inconsistent with the National Energy Policy and Executive Orders 132511, 13212, and 13302. The removal of vast areas of land from future oil and gas development and potential restrictions on both leasing and development under Alternative E would significantly restrict regional earnings, jobs, and tax revenue.	Please refer to response to comment 060-18.	No
CrownQuest	62	25	Further, the BLM has not analyzed or disclosed the potential impacts the restrictions on future leasing may have upon operations on existing leases.	Please refer to response to comment 060-9.	No
CrownQuest	62	49	Additionally, a federal oil and gas lease entitles a lessee to use of the entire lease surface as is necessary to develop the oil and gas resource.	A lessee's surface use rights are specified at 43 CFR sec. 3101.1-2. In accordance with regulations, surface use rights are subject to: any stipulations attached to the lease; restrictions deriving from specific, nondiscretionary statutes; and, reasonable measures as may be required by the authorized officer to minimize adverse impacts to other resource values, land uses or users not addressed in the lease stipulations at the time operations are proposed. Standard lease terms provide that, at a minimum, BLM may require a lessee to relocate proposed operations up to 200 meters on the leasehold and prohibit surface disturbing operations for a period not to exceed 60 days.	No
CrownQuest	62	70	In section 3.8.1, the BLM identifies "shale" as a "low-energy mud" that occurs throughout the Monticello RA. See Monticello DRMP/EIS, pg 3-46. The BLM asserts that "[no information is available regarding past and present exploration, development, or production within the Monticello RA." The BLM should distinguish between oil shale, from	In its preliminary review of mineral resources, the BLM considered "shale" as an industrial commodity similar to sand and gravel or other crushed stone. However, based on past development (or lack thereof) in the Monticello Field Office it was determined that the use of shale for industrial purposes has been minimal and therefore shale as an industrial	Yes

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			which oil can be extracted, and shale formations, which yield natural gas. Shale formations exist within the Monticello RA. With advances in drilling completion technology, production of natural gas from shale formations is feasible. Additionally, because of the development of highly productive shale formations such as Barnett shale formation in Texas, shale recently has been the subject of increased interest among oil and gas producers.	commodity was not addressed in the Mineral Potential Report (MPR). Since it was not addressed in the MPR, the BLM has deleted the reference to shale in section 3.8.1.	
CrownQuest	62	71	Both the Mineral Potential Report and the RFD Scenario for the Monticello RMP/EIS identify organic shale formations in the Paradox Fold and Fault Belt and explain that these formations may provide drilling targets for hydrocarbons. Mineral Potential Report for the Monticello Planning Area, pg 18 (July 1, 2005); RFD for the Monticello Planning Area, pg 10 (July 1, 2005). Within the Paradox Basin there is significant potential for unconventional resource plays within the Paradox shales and tight carbonate formations. The application of horizontal drilling technology and fracture stimulation of tight reservoirs has the potential to revitalize the oil and gas development within Monticello RA.	As stated by the commenter, in both the MPR and RFD, the BLM addressed the potential for unconventional resource plays associated with organic shales in the Paradox Basin.	No
CrownQuest	62	74	The BLM's projected estimates for development in the Monticello RA are unreasonably low in light of the BLM's conclusion that the Monticello RA, and particularly the Blanding Sub-basin and Paradox Fold and Fault Belt areas, have "high" potential for oil and gas. The BLM must develop the RFD Scenario by relying on geological factors as required by BLM Washington Office Instruction Memorandum 2004-089 (Jan. 16, 2004). See also BLM Land Use Planning Handbook H-1624-1 Planning for Fluid Minerals (Chapter III, B) (Rel. 1-1583, 5/7/06), as modified. Moreover, a number of factors now allow CrownQuest and other operators to economically recover resources that were previously unavailable. The BLM cannot overlook that advances in technology and market demand will continue to	Please refer to response to comment 035-5.	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			make oil and gad development more efficient.		
CrownQuest	62	75	Similarly, the BLM fails to explain how, after concluding that the RFD for the Monticello RA is 195 wells over 15 years, it determined that only 74 wells would be drilled in the next 15 years under Alternative C. Under Alternative C, 77.8% of the Monticello RA is open to oil and gas leasing subject to various levels of restrictions. Moreover, under this alternative, 35% of the Monticello RA is open to oil and gas leasing under standard lease terms. Admittedly, as explained throughout these comments, many of the lands open for oil and gas leasing are subject to restrictive and unnecessary stipulations imposed in the name of protecting wildlife and visual resources. Nonetheless, it is entirely illogically that in light of the amount of land available for oil and gas development, the BLM forecasts that the RFD for Alternative C is only 38% of the unrestricted RFD for the Monticello RA.. The BLM must explain how it reached its RFD for each of the alternatives.	The RFD projections of oil and gas activity in the planning area for the next 15 years include approximately 3.6 million acres of non-BLM lands. The 195 well figure is an estimate of total wells on all lands in the planning area. The baseline projections for number of wells on BLM land during the next 15 years is prorated based on percent of BLM land in the planning area. The 74 well estimate is for future drilling on BLM land given management prescriptions under alternative C. Also, Please refer to response to comment 035-5.	No
Glen Canyon Group, Utah Chapter, Sierra Club	221	4	The long lists of the 1,135 active and inactive, 480 abandoned and 1,652 other wells on pages 3-49 through 3-52 demonstrate that the PA has already been subjected to extensive exploration, leasing, development and production. If we compare Maps 14 and 15, we readily see that most of the region with high development potential already contains many current leases. Pending leases are largely with the regions of low and moderate potential. Why the are so man new leases and new wells being projected?	The RFD was prepared in accordance with BLM Washington Office IM 2004-89. The RFD scenario is an analytical model, which estimates oil and gas activity that could potentially occur. The RFD scenario is a reasonable technical and scientific approximation of anticipated oil and gas activity based on the best available information, including the potential for oil and gas resource occurrence, past and present oil and gas activity in conjunction with other significant factors such as economics, technology, and physical limitations on access, existing or anticipated infrastructure, and transportation. The RFD is purely an estimate; it is not a decision document nor does it establish a limiting threshold for future Federal leasing, exploration, or development activities. Rather, it is a	No

MOG – Minerals and Energy—Oil and Gas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				scenario or projection of actual and hypothetical oil and gas activities based on the specific circumstances or constraints associated with each alternative and corresponding mitigation measures. This hypothetical framework focuses the impact analysis associated with oil and gas leasing and allows BLM to do a comparative analysis of management alternatives. Because the calculations are based on variables or factors that are difficult to accurately determine, the projection of oil and gas wells can vary greatly. These variables or factors include the price of oil and gas, the success or failure of exploration in unproven areas, and the willingness of investors to invest their money in risky exploration for oil and gas in unproven areas. As project-specific drilling operations are being considered, the BLM performs a land use plan conformance review and determination of NEPA adequacy. If conditions change, the BLM may need to perform further NEPA analysis in either an environmental assessment or an environmental impact statement. A land use plan amendment would not be required.	

MSA – Minerals and Energy—Salable					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
U.S. Fish and Wildlife Service	2	20	Page 4-123 in Section 4.3.7.4.4. FWS strongly recommends mineral materials not be disposed of within floodplains and riparian/aquatic areas as this is likely to have significant negative impacts on aquatic resources and valuable wildlife habitat.	Active floodplains and riparian areas would be protected with a NSO stipulation under all management alternatives (Table A.1). Proposed management of these areas would be consistent with Executive Orders 11988 and 11990).	No
EOG Resources	60	40	In section 3.8.1, the BLM identifies "shale" as a "low-energy mud" that occurs throughout the Monticello RA. See Monticello DRMP/EIS, pg 3-46. The BLM asserts that "[no information is available regarding past and present exploration, development, or production within the Monticello RA." The BLM should distinguish between oil shale, from which oil can be extracted, and shale formations, which yield natural gas. Shale information exists within the Monticello RA.	In its preliminary review of mineral resources, the BLM considered "shale" as an industrial commodity similar to sand and gravel or other crushed stone. However, based on past development (or lack thereof) in the Monticello Field Office it was determined that the use of shale for industrial purposes has been minimal and therefore shale as an industrial mineral material was not addressed in the Mineral Potential Report (MPR). Since it was not addressed in the MPR, the BLM has deleted the reference to shale in section 3.8.1	Yes

OTH – Other					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
U.S. Fish and Wildlife Service	2	26	Page 4-423 in section 4.3.15.1. In the second line, provide a reference in this section to Table 4.107 on page 4-435; check for similar places in the document for which a reference to another page will provide the reader easy access to further information.	The reference has been added in and BLM will check for other opportunities to reference other sections throughout the document.	Yes
U.S. Fish and Wildlife Service	2	34	Page 4-556 in section 4.3.19.1. In the first paragraph, the document references Appendix O as providing a list of BMPs for reducing impacts on wildlife resources. Instead, Appendix O discusses wilderness characteristics.	Changes have been made to the document to reflect the appropriate appendix.	Yes
State of Utah	4	5	The Draft RMP/EIS does not include a discussion on the nature or type of threat of "irreparable damage" or the regional significance of relevant and important values in its review. BLM misinterprets irreparable damage when reviewing and analyzing ACECs in the Draft RMP/EIS. The ACEC tool was intended by Congress to be limited to only those instances where irreparable damage would be caused without designation. Most surface disturbing actions can eventually be repaired.	The potential ACECs brought forward for designation into the Proposed Plan have gone through a rigorous and stringent process in accordance with FLPMA, the planning regulations at 43 CFR 1600, Land-use Planning Handbook (H- 1601-1), and in accordance with BLM Manual 1613 and ACEC Policy and Procedures Guidelines (45 FR 57318). Appendix H outlines the process the interdisciplinary team underwent to determine whether a nominated ACEC had relevance and/or importance values. The size of the proposed ACECs is limited only to the area(s) of geography where the relevance and importance values are manageable to protect and prevent irreparable damage to these resources. The potential ACECs carried forward into the Proposed Plan necessitate an ACEC designation because special management protection is necessary (outside of normal multiple-use management) to specifically protect the relevance and importance values within the areas identified. The special management prescriptions that have been proposed are narrowly tailored to protect the identified relevant and important values. For these reasons, the potential ACEC decisions carried forward into the Proposed Plan are considered by BLM to be consistent with Utah Code	Yes

OTH – Other					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				63j-4-401. A rationale for designating or not designating ACECs in the Preferred Alternative of the DRMP/EIS is found in Appendix H of the PRMP. Relevant text has been added to Appendix H of the PRMP/FEIS, which lists the threats to each proposed ACEC. These threats could result in irreparable damage to the area proposed for ACEC designation. The ACEC evaluation appendix was modified, and a section added to Chapter 2 discussing threats to the relevant and important ACEC values; however, whether the threats currently exist does not preclude a potential ACEC from being considered in the action alternatives. All nominated areas, where the BLM has determined to have relevant and important values, are identified as potential ACECs and are addressed in the action alternatives. Threats to relevant and important values are likely to vary by alternative. The PRMP/FEIS was revised from the draft document to better address potential threats and impacts associated with each alternative. On August 27, 1980, the BLM promulgated final ACEC guidelines (45 Federal Register 57318) clarifying the term “protects” – “To defend or guard against damage or loss to the important environmental resources of a potential or designated ACEC. This includes damage that can be restored over time and that which is irreparable. With regard to a natural hazard, protect means to prevent the loss of life or injury to people, or loss or damage to property.” Thus, BLM is to consider the potential for both reparable and irreparable damage when protecting important historic, cultural, or scenic values; fish and wildlife resources; or other natural systems through ACEC designation. This	

OTH – Other					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				interpretation is consistent with FLPMA's legislative history and implementing policy. Section 2 of the guidelines clarifies that ACECs are special places within the public lands. It states: "In addition to establishing in law such basic protective management policies that apply to all the public lands, Congress has said that 'management of national resource lands [public lands] is to include giving special attention to the protection of ACECs, for the purpose of ensuring that the most environmentally important and fragile lands will be given early attention and protection' (Senate Report 94-583, on FLPMA). Thus, the ACEC process is to be used to provide whatever special management is required to protect those environmental resources that are most important, i.e., those resources that make certain specific areas special places, endowed by nature or man with characteristics that set them apart. In addition, the ACEC process is to be used to protect human life and property from natural hazards."	
State of Utah	4	75	Given the scale of available mapping, it is often difficult to reconcile interactions between management prescriptions. The state encourages BLM to carefully review and consider interactions between management stipulations as it formulates the Final RMP and eliminate incompatible requirements and improve mapping detail.	BLM has considered the interaction between management prescriptions and has attempted to make prescriptions compatible.	No
Ute Mountain Ute Tribe	6	4	The Tribes' preferred communication contact for BLM is Leona Eyetoo, White Mesa Representative on the Ute Tribal Council (970-564-5604).	Preference noted.	No
Canyon Country Heritage Association	18	11	Questions were asked about the level of law enforcement for the MFO area.	Staffing levels are not part of the RMP revision process nor could they be for a plan expected to span a 10 to 15 year period. They are not addressed at a land use planning level.	No

OTH – Other					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Spear	19	11	Questions were asked about the level of law enforcement for the MFO area.	Decisions on staffing levels and law enforcement are administrative actions. Please refer also to response to comment 43-5.	No
Southern Utah Wilderness Alliance	26	2	The Monticello DRMP/EIS fails to acknowledge the public will regard land management preferences. The commenter alleges that "BLM must be more aggressive protecting natural resources."	The public raised many concerns during the scoping period which were incorporated into the Monticello DRMP/EIS. In fact, the issues raised by the commenter were identified as Issues 1 and 3 on page ES-3 of the DRMP/EIS. Issue 1 states, “How can increased recreation use, especially motorized vehicle use, be managed while protecting natural resources values?” Issue 3 states, “What areas should have special designations such as ACECs…” An adequate range of alternatives was presented in the DRMP/EIS that varied the levels of protection for all resources. A range of management actions was developed to address the issues identified by the public. All the action alternatives significantly reduce areas open to cross country use and reduce the number and mileage of routes open to motorized travel.	No
Southern Utah Wilderness Alliance	26	5	Certain elements of the RMP, most strikingly the travel plan and OHV designations, fail the test of the unnecessary or undue degradation (UUD) standard of FLPMA. By several measures, the proposed travel plan 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, and reduction of naturalness in areas with identified wilderness characteristics.	The BLM analyzed the impacts of travel management and OHV designations as described in Chapter 4 of the DRMP/EIS. Congress recognized that, through the multiple use mandate, that there would be conflicting uses and impacts on the public land.	No
National Parks Conservation Association	44	6	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 a cooperating agency.	Cooperating agency status was extended to Federal, State, and local agencies, including the National Park Service. In addition to the cooperating agencies, the BLM Monticello Field Office held meetings with and sought the input of other agencies that have land management jurisdiction within or adjacent to the planning area. In particular, the BLM conducted many coordination meetings with the Nation Park Service during the development of the DRMP/DEIS in order to	No

OTH – Other					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				solicit its concerns. Although not a formal cooperating agency, members of the National Park Service staff worked closely with the BLM to resolve issues and address concern, when possible.	
National Parks Conservation Association	44	7	The exclusion of the NPS 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 Canyonlands National Park, Glen Canyon NRA, Hovenweep and Natural Bridges National Monument 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 and alternative for implementation. The NPS should be given the opportunity to review the information previously provided to the other cooperating agencies, and the provide input on the analysis of effects and management recommendations pertaining to Canyonlands National Park, Glen Canyon NRA, Hovenweep and Natural Bridges NM.	Cooperating agency status was extended to Federal, State, and local agencies, including the National Park Service. In addition to the cooperating agencies, the BLM Monticello Field Office held meetings with and sought the input of other agencies that have land management jurisdiction within or adjacent to the planning area. In particular, the BLM conducted many coordination meetings with the Nation Park Service during the development of the DRMP/DEIS in order to solicit its concerns. Although not a formal cooperating agency, members of the National Park Service staff worked closely with the BLM to resolve issues and address concern, when possible.	No
EOG Resources	60	12	On page 2-12, the BLM proposes various management actions for the Old Spanish National Historic Trail but does not provide a map showing the trail's exact route. See Monticello DRMP/EIS, pg 2-12, Table 2.1. In the final Monticello RMP/EIS, the BLM should include a map of the segment of the Old Spanish National Historic Trail that passes through the Monticello RA.	The National Park Service is currently preparing the Draft Comprehensive Management Plan/Environmental Impact Statement for the Congressionally designated Old Spanish Trail. Maps will be included in this document when it is issued to the public expected by the end of year 2008. The commenter should refer to this document for detailed maps when it is completed.	No
CrownQuest	62	5	The Monticello RMP, when revised, cannot defeat or	Valid existing rights are considered Administrative Actions by	No

OTH – Other					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			materially restrain CrownQuest's valid and existing rights to exploit its leases through COAs or other means.	the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria 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.	
CrownQuest	62	22	Congress made it clear when it enacted FLPMA that nothing therein, or in the land use plans developed there under, was intended to terminate, modify, or alter any valid or existing property rights. See 43 U.S.C. 1701 note (2006). In order for the public to be fully informed, the Monticello RMP should contain similar statements and guarantees.	Valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decisions are subject to valid existing rights. The BLM will work with and be 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.	No
Glen Canyon Group, Utah Chapter, Sierra Club	221	7	GLOSSARY in Volume 3 should include many definitions from Attachment B to Appendix N, namely definitions for: Designation, Emergency limitations or closures, Mechanized travel, Motorized travel, and Non-motorized travel. Additional definitions should be added for: Road, Trail, and	The glossary has been updated in the FEIS to include these terms.	Yes

OTH – Other					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Route.		
Form Letter 6	FL6	1	Dear Bureau Of Land Management , (please delete this and type your comments here)	No response required.	No

PRP – Process and Procedure					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
U.S. Fish and Wildlife Service	2	13	The characterization and description of BLM lands and all Planning Area lands are used interchangeably within the between sections, causing confusion. Consistent use of one or the other would be beneficial, or otherwise provide both throughout. See page 3-42	Consistent use of BLM lands and Planning Area lands has been incorporated into the document to avoid confusion.	Yes
National Park Service Intermountain Region	3	9	The Glen Canyon NRA Minerals Management Plan (1980) and the Glen Canyon NRA Grazing Management Plan (1999) should be added to the list of "1.4. Relationship to Other Policies, Plans, and Programs" and further incorporate their contents throughout the DRMP as necessary.	BLM has added the Plans to Section 1.4. BLM was aware of the Management Plans at the time the DRMP/EIS was prepared and the information contained was used as appropriate. The commenter did not provide other specific deficiencies.	Yes
National Park Service Intermountain Region	3	11	The NPS suggested the following narrative be inserted where appropriate: [Glen Canyon NRA was established on October 27, 1972, under Public Law (P. L.) 92-593. In establishing Glen Canyon NRA, Congress directed that, "The administration of …grazing leases within the recreation area shall be by the BLM. The same policies followed by the BLM in issuing and administering…grazing leases on other lands under its jurisdiction shall be followed in regard to lands within the boundaries of the recreation area, subject to provisions of Section 3(a) and 4 of this Act.". The Monticello FO administers livestock grazing on six grazing allotments that occur on public land and within Glen Canyon NRA. In total, the Monticello FO administers grazing on approximately 264,267 acres of the recreation area. Specific management direction for livestock grazing in Glen Canyon NRA is provided for under the Glen Canyon NRA 1999 Grazing Management Plan.]	BLM has inserted the narrative as follows: Page 3-41, 3.7.1. [Glen Canyon NRA was established on October 27, 1972, under Public Law (P. L.) 92-593. In establishing Glen Canyon NRA, Congress directed that, "The administration of …grazing leases within the recreation area shall be by the BLM. The same policies followed by the BLM in issuing and administering…grazing leases on other lands under its jurisdiction shall be followed in regard to lands within the boundaries of the recreation area, subject to provisions of Section 3(a) and 4 of this Act.". The Monticello FO administers livestock grazing on six grazing allotments that occur on public land and within Glen Canyon NRA. In total, the Monticello FO administers grazing on approximately 264,267 acres of the recreation area.] Management Common to All, page 2-17, "Specific management direction for livestock grazing in Glen Canyon NRA is provided for under the Glen Canyon NRA 1999 Grazing Management Plan."	Yes

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
National Park Service Intermountain Region	3	12	The 1984 Interagency Memorandum of Understanding on the administration of livestock grazing in Glen Canyon NRA should be added to the list of programmatic MOUs.	BLM has added the Memorandum of Understanding to the list of programmatic MOUs, section 1.4.	Yes
State of Utah	4	3	The BLM should commit to utilizing the State's expedited energy permitting process.	Federal laws, rules, regulations, and policies govern the procedures for processing all Federal projects.	No
State of Utah	4	29	The state encourages the BLM to contact all neighboring state, federal, and tribal agencies and collaboratively identify all other significant reasonably foreseeable activities to be considered as part of the analysis.	The Reasonably Foreseeable Development Scenario (RFD) for Oil and Gas is the best example of this process. Future foreseeable development for oil and gas was identified and analyzed for other land ownerships (non-BLM administered lands) within the Planning Area. Reasonably foreseeable activities for other resources on non-BLM administered lands were not identified unless they were brought up during scoping and comment periods.	No
San Juan County	7	1	The County asks BLM to consider its statutory responsibility under FLPMA toward consistency of its land use plans with State and local plans.	The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 ©(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled. 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	No

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				have a complete understanding of the impacts of the PRMP on State and local management options. The BLM will document the required Governor's consistency review in Chapter 5.	
San Juan County	7	3	More emphasis should be placed on monitoring the plan decisions both to measure the results of the plan and to insure that actions are taken to incorporate any changes needed. Watershed function, livestock use, recreation, OHV use and wildlife populations are uses that should be monitored more closely. The plan should have greater flexibility to adapt to changing conditions.	The Federal regulations at 43 CFR 1610.4-9 require that land use plans establish intervals and standards and evaluations based on the sensitivity of the resource decisions involved. The Record of Decision (ROD) for the RMP will commit to a monitoring plan the specifics of which will be developed subsequent to the signing of the ROD.	No
San Juan County	7	4	San Juan County asks for more cooperation and collaboration with local, state, and federal agencies (as well as interest groups) in actions and decisions within the Field Office. Misunderstandings could then be worked out in advance -- in the field rather than the courtroom. Within the framework of this RMP, the BLM should provide more opportunities to facilitate cooperative relationships and foster better collaboration efforts.	The State of Utah and San Juan County are cooperating agencies involved in the preparation of the RMP. The BLM has involved the cooperating agencies in all aspects of the land use planning process including participation in the interdisciplinary team meetings. Cooperation and collaboration will continue on site specific projects after the RMP is completed and this does not require a plan decision to accomplish.	No
San Juan County	7	19	San Juan County is opposed to "layering" of restrictive land use designations such as ACECs or SRMAs over WSAs or Wild and Scenic Rivers.	"Layering" is planning. Under FLPMA's multiple use mandate, 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, BLM doesn't 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". 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	No

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				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. All uses and values cannot 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 can be considered together 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. 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. BLM's Land Use Planning Handbook requires that specific decisions be made for each resource and use (See, Appendix C, 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. SRMAs are not restrictive of resource uses but rather are utilized to control recreation use. Several SRMAs overlay other designations such as WSAs, ACECs and wild and scenic river segments, but the management proposed in each	

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				is for differing purposes and is not incompatible.	
San Juan County	7	38	Pg. 2-25 - The maps for Cedar Mesa Cultural SRMA and ACEC for Valley of the Gods overlap. Please clarify the management of this area to avoid the layering of protection.	In the FEIS, this overlap does not exist.	No
San Juan County	7	45	Pg. 2-34 - San Juan County is opposed to any layering of ACECs over WSAs.	Please refer to response to comment 007-19.	No
San Juan County	7	47	Pg. 2-37 - San Juan County cannot support the designation of the Butler Wash North ACEC due to its layering over a WSA. However, the County would support Alternative C if the WSA was not included as part of the ACEC.	In the FEIS, the Butler Wash North area would not be designated as an ACEC but would be managed under the IMP.	No
San Juan County	7	49	Pg. 2-37 - San Juan County cannot support any of the alternatives for the Cedar Mesa area because of the layering of ACEC and C-SRMA over WSA. The County would support Alternative C if the ACEC and C-SRMA are removed from the WSA and management is in accordance with the IMP in those areas.	In the FEIS, the ACEC and the C-SRMA are not being carried forward. The area will be managed as a SRMA and it will contain WSAs. See also refer to response to comment 007-48.	No
BCS Project Rock Art	11	2	We believe that it is time for BLM to include rock art scholars as stakeholders and collaborating partners in planning RMP's	The BLM Monticello Office spent 7 months in a public scoping process during which public meetings were held across Utah asking for public input. Public input about issues was solicited during this time and any individual, group or organization was invited to provide information to Monticello BLM for incorporation into the DRMP/DEIS.	No
Utah Archaeological Research Institute	14	4	CSMA is not listed in the Acronyms and Glossary.	The Proposed RMP/FEIS does not manage lands as CSMAs.	No
Southern Utah Wilderness Alliance	26	1	The public comment period is far too short to allow for a fully informed response to the draft plan.	The standard comment period for an Environmental Impact Statement is 45 days in accordance with the Federal Council on Environmental Quality regulations. The BLM's planning guidance double that time or 90 days. The Monticello DRMP/EIS had a 95 day comment period. The BLM has made the DRMP/EIS available free of charge in a variety of	No

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				media including paper, CD, and online. Furthermore, BLM staff has offered to meet individually with groups or individuals to explain the DRMP/EIS and help focus review and comment efforts. Finally, the BLM held 5 open houses to facilitate review of the Monticello DRMP/EIS.	
Southern Utah Wilderness Alliance	26	24	The EIS does not meet NEPA's requirements to analyze cumulative impacts and connected actions. The EIS for the plan revisions generally provides little or no discussion of cumulative impacts or the effects of connected activities on various resources.	The cumulative impacts of plan alternatives are analyzed in Chapter 4 of the DRMP/EIS. This analysis does not require speculation about the impacts from possible future activities. The BLM asserts that the analyses of cumulative impacts satisfy the requirements of NEPA.	No
Southern Utah Wilderness Alliance	26	30	NEPA requires that BLM not limit its review to the 4 proposed alternatives. For example, BLM could decide to protect additional lands with demonstrated wilderness character or designate additional river segments as suitable for protection under the Wild and Scenic Rivers Act.	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, 5 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. BLM, in developing the PRMP/FEIS, can choose management actions from within the range of 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.	No
Lynell Schalk	29	1	The final section of Volume 3 has a section entitled "References, Acronyms and Glossary, and Index." In the Reader's Guide a the beginning of Volume 1, there is no reference to an acronym index, nor is it referenced in the Table of Contents, which ends with Appendix Q. Some acronyms used in the document are not even listed in this acronym index, such as the double meaning of ORV, i.e. off-road vehicle and outstandingly remarkable values	Acronyms and Glossary is listed in the Table of Contents on page xl of Vol. 1. Additional acronyms have been added to this list as they are identified.	Yes

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			(Reference: pg. H-91, Vol. 3).		
Broads Healthy Lands	41	1	Pursuant to Council of Environmental Quality -Regulations for Implementing NEPA, the comment period for the Monticello Field Office DRPM must be reopened after documents referenced in the DRPM/DEIS are provided to us. Once the documents referenced are provided to us electronically or via overnight mail, we require two weeks time to review them and to submit substantive comments for response in the FEIS based on those documents.	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 five open houses around the State to facilitate review of the Monticello DRMP/DEIS. There will be a 30 protest period once the FEIS is published.	No
Broads Healthy Lands	41	2	There was no meaningful effort to gather public input from the largest population center and economic center proximate to the MFO. That would be the southwest corner of Colorado and northwest New Mexico, where nearly 80,000 people reside. These people consider San Juan County, UT to be in "their backyard" and an important area for recreation and escape to wilderness quality experiences. There was no effort to publicize the MFO DRMP or to hold meetings on the planning process in this important and nearby population center.	The BLM has followed the land use planning process and has involved the public throughout. The public participation process is outlined in Chapter 5 of the DRMP/DEIS. The public was afforded many opportunities for involvement. The BLM acknowledges that the planning process is complex requiring participants to look in many locations within the document to get the answers to questions they may have. This is why the BLM regulations require a 90-day a public comment period rather than the normal 45-day period for an Environmental Impact Statement.	No
Broads Healthy Lands	41	8	Because the MFO used San Juan County data, the DRMP recognizes state and county road claims for planning purposes. In this way, it exceeds any permissible or possibly permissible rule or policy. This process is far beyond even	Please refer to response to comment 41-3.	No

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			the limited decision making process conceived in the non-binding determination process outlined by the BLM.		
National Parks Conservation Association	44	3	Maps 23-27 need to identify all national park units and their boundaries. Otherwise meaningful analysis of oil and gas development upon park resources is difficult to access. All alternatives appear to have standard and special stipulation leasing near or adjacent to park borders including Canyonlands NP, Glen Canyon NRA, Natural Bridges NM and Hovenweep NM.	The map has been updated to show National Park Service units.	Yes
BlueRibbin Coalition	54	1	Regarding planning criteria in section 1.3.4: The BLM would make all possible attempts to ensure that its management prescriptions and actions are as complementary as possible with other planning jurisdictions (both federal and nonfederal), subject to applicable law and policy. Similar management prescriptions would be considered on adjoining lands to minimize inconsistency. To the extent possible, inventories, planning, and management programs would be coordinated with other federal, state, and local agencies and tribal governments. Chapter 1, page 1-12 The term "complementary" should be changed to "consistent." BLM's FLPMA mandate is for consistency, not to be "complementary." Changing the term from the well understood term of "consistent" to an undefined term of "complementary" is in poor form. The Consistency requirement is extremely important to state and local governments and is considered to be on of the key "pillars" of FLMPA.	The word has been changed to "consistent" in the FEIS.	Yes

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
ECOS Consulting	58	11	Many of the impacts described in this Monticello DRMP/EIS have been monitored by the BLM, but the Monticello DRMP/EIS fails to include this monitoring data, or to provide analyses, trends, and/or summary data for the information collected in the field. Alternatively, the BLM promises to monitor conditions in the field and use "Adaptive Management", but no monitoring program is described, nor are results presented. For example, the BLM promises to continue to analyze the impacts of limited and designated travel routes, and to base their "adaptive" management on the result of these analyses. However, the BLM has not described or even mentioned the existence of a monitoring program that measures and assesses the resources for condition and trends. What protocols are the BLM using to make determinations of condition problems and trends? Has the BLM been monitoring this in the past? If so, what are the protocols? Are there any reports, and who does the monitoring? This information is vitally important in order for the decision makers and public to assess the existence and/or effectiveness of these monitoring programs.	Adaptive management merely means using site specific factors to guide future decisions. Monitoring data have been collected on various resources throughout the years and are stored in the Monticello FO. These data have helped form the basis for local staff knowledge which was used in the impact analyses in Chapter 4.	No
ECOS Consulting	58	17	Throughout this Monticello DRMP/EIS the BLM refers to specific rules, Best management Plans, regulations, standards and guidelines, and policy as proof that the impacts of particular actions will not be serious. This is a violation of NEPA, which requires a full assessment of short- and long-term direct, indirect, and cumulative impacts of all proposed actions, and this information must be included in this Monticello DRMP/EIS.	Regulations, standards, guidelines etc. are required and/or adhered to as a matter of BLM policy. This means that these actions are part and parcel of the Proposed Action, and the Proposed Action is analyzed with these protections in place.	No
EOG Resources	60	1	When finalizing the Monticello RMP, the BLM should also acknowledge the BLM's recent decision to add geophysical exploration, when no temporary or new road construction is proposed, to the Department of the Interior's list of activities that do not require the preparation of an EA or EIS. See DOI Manual, Chapter 11.9.B(6), (516 DM 11.9B(b)), 72 Fed. Reg.	The NEPA documentation required for geophysical operations is determined on a site specific basis and does not require a land use planning decision. For the purpose of analysis in Chapter 4 of the DRMP/EIS, it	No

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			45504, 45539 (Aug. 14, 2007)).	is assumed that cross country travel for geophysical operations result in surface disturbance that require about 10 years to fully reclaim. These assumptions are based on BLM experience in the area.	
EOG Resources	60	3	FLPMA also requires the Secretary of the Interior to comply with specified procedural requirements before making a management decision that totally eliminates a principal or major use of the public lands for a period of two or more years on a tract of land more than 100,000 acres in size. 43 U.S.C. 1712(e) (2006). Oil and gas development is defined as a principal or major use of the public lands. 43 C.F.R. 1702(1) (2007). Under Alternative E, the BLM would close nearly one million acres to oil and gas leasing, yet BLM has not complied with the clear requirements of FLPMA. BLM must notify Congress of its intent to close significant areas to future oil and gas development prior to finalizing the Monticello RMP.	43 U.S.C. 1712(e) applies to single tracts of land of 100,000 acres or more, not individual tracts of smaller acreages totaling 100,000 acres or more. None of the tracts of land proposed to be closed to leasing in the PRMP exceed this size.	No
EOG Resources	60	6	For those goals in which the BLM seeks to improve compatibility between mineral extraction and other resource uses, the BLM should rephrase these planning issues to avoid the suggestion the BLM intends to entirely resolve any conflicts between multiple uses.	The BLM acknowledges that all conflicts can never be resolved. BLM planning attempts to minimize conflicts between multiple uses.	No
EOG Resources	60	7	Opponents of energy development on the public lands often argue that oil and gas development is never compatible with recreational uses or wilderness values. Courts have long recognized that the BLM is not required to manage every parcel of lands for multiple uses, but meets its multiple use obligations by looking at the overall use of the public lands. Rocky Mountain Oil & Gas Assoc. v. Watt, 690 F.2d 734, 738 n.4. (10th Cir. 1982). Therefore, the BLM should revise its goals to state: Reducing the impact of surface disturbances from mineral	The BLM has provided multiple uses on various lands within the Monticello Field Office. That is, not every use is required on every acre of BLM lands. The BLM strives to accommodate as many uses on the land as possible. The Gold Book's measures strive to reduce the impact of surface disturbances from mineral exploration. The compatibility between oil and gas development and dispersed recreation is often in the mind of the recreationist; this is beyond the control of the BLM.	No

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			exploration and development on other resources and uses….. Improving compatibility between oil and gas development and dispersed and remove recreational opportunities.		
EOG Resources	60	23	The BLM must clarify the term "site specific NEPA." As the BLM is aware, all agency actions or authorizations are generally subject to the mandates of NEPA. See 42 U.S.C. 4332 (2006). Merely instructing that an action is subject to "site-specific NEPA" does not impose any obligation beyond that already required by federal law. However, NEPA requires that the BLM prepare an EIS for any major federal actions that will significantly affect the quality of the human environment. 42 U.S.C. 4332 (2006). The phrase "site specific NEPA" may improperly suggest that all activities in sensitive soils are major federal actions that require preparation of an EIS. The BLM clearly did not intend to impose such an onerous and absurd result that would require the agency to expend significant time and resources before authorizing any activities in sensitive soils. The BLM must revise the phrase to clearly explain the amount of environmental analysis the BLM intended to require, if any, prior to authorizing activities in sensitive soils.	The commenter is correct in that an activity proposed on sensitive soils may not necessarily constitute a major federal action requiring an EIS, solely based on its association with a sensitive site. The appropriate level of NEPA analysis is generally determined by the size and type of proposed activity, potential impacts, and resource concerns, as identified in internal and external scoping. This section has been clarified to indicate that additional or site specific mitigation measures necessary to protect sensitive soils would be determined in site specific planning through the “appropriate NEPA process”. Also a definition of sensitive soils has been added to the glossary. It was not deemed necessary to define “site-specific planning” in that this term is generally understood to be related to a specific project or group of similar activities.	Yes
CrownQuest	62	6	When finalizing the Monticello RMP, the BLM should also acknowledge the BLM's recent decision to add geophysical exploration, when no temporary or new road construction is proposed, to the Department of the Interior's list of activities that do not require the preparation of an EA or EIS.	The NEPA documentation required for geophysical operations is determined on a site specific basis and does not require a land use planning decision. For the purpose of analysis in Chapter 4 of the DRMP/EIS, it is assumed that cross country travel for geophysical operations result in surface disturbance that require about 10 years to fully reclaim. These assumptions are based on BLM experience in the area.	No

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
CrownQuest	62	23	When finalizing the Monticello RMP, the BLM should also acknowledge the BLM's recent decision to include geophysical exploration, when no temporary or new road construction is proposed, to the Department of the Interior's list of activities that do not require the preparation of an environmental assessment or environmental impact statement. See DOI Manual, Chapter 11.9.B(6), (516 DM 11.9B(b), 72 Fed Reg. 45504, 45539 (Aug. 14, 2007).	Please refer to response to comment 060-17.	No
Adonia Ripple	148	2	The BLM has provided far too little time for the public to review and comment on the massive and detailed Monticello CRMP. The BLM must extend the comment period so more citizens have the opportunity to learn about and provide input on this important management plan.	Please refer to response to comments 026-1 and 151-1.	No
Patrick Flynn	151	2	The BLM has provided far too little time for the public to review and comment on the massive and detailed Monticello DRMP. The BLM must extend the comment period so more citizens have the opportunity to learn about and provide input on this important management plan.	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.	No
Warren Kesselring	155	2	The BLM has provided far too little time for the public to review and comment on the massive and detailed Monticello DRMP. The BLM must extend the comment period so more citizens have the opportunity to learn about and provide input on this important management plan.	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.	No
Mike Mellick	156	2	The BLM has provided far too little time for the public to review and comment on the massive and detailed Monticello	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land	No

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			DRMP. The BLM must extend the comment period so more citizens have the opportunity to learn about and provide input on this important management plan.	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.	
Casey Yorkunas	158	2	The BLM has provided far too little time for the public to review and comment on the massive and detailed Monticello DRMP. The BLM must extend the comment period so more citizens have the opportunity to learn about and provide input on the important management plan.	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 four open houses around the State to facilitate review of the Monticello DRMP/DEIS.	No
Ann Mellick	216	1	The BLM has provided far too little time for the public to review and comment on the massive and detailed Monticello DRMP. The BLM must extend the comment period so more citizens have the opportunity to learn about and provide input on this important management plan.	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.	No
Tom Fleischner	218	2	The BLM has provided far too little time for the public to review and comment on the massive and detailed Monticello	The BLM provided the public with 90 days to review and comment on the DRMP/DEIS, as required by the BLM land	No

PRP – Process and Procedure					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			DRMP. The BLM must extend the comment period so more citizens have the opportunity to learn about and provide input on this important management plan.	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.	
Glen Canyon Group, Utah Chapter, Sierra Club	221	3	Where BLM policy regarding OHV use conflicts with requirements of the National Historic Preservation Act, Section 106, (page 1-5), resolution of the conflict should favor the NHPA.	In general, OHV use should avoid impacts on cultural resources where possible. Resolution of conflicts would be made on a site-specific or case-by-case basis	No
Glen Canyon Institute	222	9	The BLM has issued six voluminous management plans in the last few months, the latest being the Monticello DRMP. Although it took years to prepare these documents, the public is given only 90 days to comment on these huge, detailed, and confusing plans. The Monticello DRMP comment period is grossly inadequate to provide meaningful public review and input - especially in light of multiple, overlapping plans issued by the BLM. Changes Needed in the Comment Process 1. Extend the comment period for the Monticello DRMP by 60 days. 2. Issue a new public notice to ensure that citizens are aware of the extended comment period. 3. Hold public comment meetings in locations close to the Monticello planning area and in large population areas such as Salt Lake City.	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 four open houses around the State to facilitate review of the Monticello DRMP/DEIS.	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Environmental Protection Agency Region 8	1	5	EPA is concerned that BLM will be unable to adequately control and mitigate ongoing and future impacts to various resources from travel and recreation uses. EPA recommends several specific actions to address these impacts including 1) limiting recreation use to non-riparian and areas outside of non-WSA lands with wilderness character, 2) restoration and protection of these sensitive resources, 3) development of partnerships and maintaining a credible field presence.	The BLM analyzed the impacts of recreation uses and travel management as outlined and described in Chapter 4 of the DRMP/EIS. Congress recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. The proposed alternative presents a balanced approach between resource use and resource protection.	No
Environmental Protection Agency Region 8	1	8	EPA is concerned about the proposed reduction in areas closed to OHV use in Alternative C and the potential impacts associated with this proposed change. EPA could find no discussion of the potential impacts associated with this change and recommends that BLM specifically disclose these potential impacts in the FEIS.	Environmental Consequences of Alternatives can be found in Chapter 4. As an example, Impacts of Travel Management Decisions on Travel can be found at 4.3.16.2.11.	No
Owen Severance	105	1	You are proposing designated campsites in Dark Canyon. How many? In order to allow hikers a choice of campsites, and to spread out the impacts, at least 50 sites should be designated. There is not enough information presented to assess this proposal.	The plan states "If and where necessary, camping would be restricted to designated sites only". If management decides to designate sites appropriate cultural clearances and NEPA would be completed.	No
National Trust for Historic Preservation	13	4	We strongly recommend that BLM develop and evaluate a permitting scheme for OHV users before finalizing the RMP.	This has been done in the form of SRP's for the Recreation Program.	No
Veronica Egan	131	2	Clarify the exclusion of "domestic pets" from Tank Bench, Butler Wash and Comb Ridge to read "domestic pets excluded from archeological sites." Either that, or exclude all domestic livestock and motorized/mechanical access to these areas as well. Livestock and bicycles are allowed--including within archeological sites--based on your proposals. As bikes and cows cause far more impacts than domestic pets, this policy seems arbitrary and capricious.	The proposed plan will allow domestic pets into Tank Bench, Butler Wash and Comb Ridge with the new restriction that they will not be allowed into cultural sites. Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Under the preferred alternative, mountain bikes would only be allowed	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				on routes designated open for motorized use. The proposed plan for Tank Bench states "Available for livestock use but it may be limited if cultural resources are impacted". Areas unavailable for grazing can be found in the bulleted management prescriptions on page 2-17 and 2-18. Portions of the West Butler Wash Canyons are closed to cattle.	
Red Rock 4-Wheelers	20	1	Commenter states that most alternatives in the plan seek to require a SRP (special recreation permit) system, seemingly without thought to the intense demand on agency staffing resources that would be required to enforce the SRP system.	Recreation use in the Monticello planning area (PA) has continued to grow in popularity since the approval of the 1991 RMP. The wide range of recreational opportunities available and the spectacular scenery, both within the PA and in the nearby national parks and monuments, draws many visitors to the area. With the number of visitors continuing to grow, recreation activity is expanding farther into the backcountry, and resource and user conflicts are becoming more common, more intense, and more difficult to manage. The need is for a permit system to promote the optimum recreation experience and resolve endangerment of other resource values in areas being "loved to death" by growing recreation use.	No
Red Rock 4-Wheelers	20	2	All SRMAs should have language included to provide a mechanism for future new routes and route connections as conditions warrant or recreational needs change	In the final RMP, designated OHV routes will be portrayed by a map entitled "Field Office Travel Plan and Map". This map is then the basis for route signing and enforcement. The field office will prioritize actions, resources, and geographic areas for implementation. The implementation goals include completing signage, maps, public information, kiosks, and working with partners. The placement of signs, kiosks, informing and educating the public recreation users will be implemented after the signing of the RMP and will not be decided in the PRMP/FEIS.	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				The implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and funding, etc.	
U4WDA	21	1	Commenter does not believe the BLM should close any existing routes within the SRMAs. Any designated SRMAs should put emphasis on motorized recreation and expanding the available routes.	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. BLM feels that the range of alternatives reasonably covers the options.	No
U4WDA	21	3	No special recreation use permits in Arch Canyon. BLM should develop a reasonable system for users to obtain permits and dedicate a staff member to oversee the permit system.	Development of a permitting system and staffing levels are not part of the RMP revision process nor could they be for a plan expected to span a 10 to 15 year period. They are not addressed at a land use planning level but on an implementation of the plan level. The implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and funding, etc. The Monticello DRMP/DEIS analyzed a range of alternatives, which varied the number of vehicles associated with organized recreational groups. SRPs allow the BLM to impose protective stipulations on users, thereby protecting the resources present and reducing user conflicts. As the permits issued are increased, resource protection would also be enhanced. Increasing the number of SRP with specific stipulations to protect and preserve cultural and natural	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				resources would result in more protection and a less likelihood of impact. Land use planning is a tiered process ranging from broad general allocations and management prescriptions to subsequent site-specific authorizations. The issuance of a SRP is a site-specific implementation level authorization, which requires full compliance with NEPA, including analyzing the direct, indirect and cumulative impacts associated with each proposal. For Arch Canyon, the FEIS will not be requiring permits for private use for any user group. Special Recreation Permits will be required for any organized or commercial groups.	
Mary Meloy	220	2	Concerning the San Juan River SRMA 4. 3. 10. 3. 10. 1 of the planning document on page 4-261 last paragraph it states: "The land on the south bank of the San Juan River is owned by the Navajo Nation and camping is currently not permitted." This statement is incorrect. The Navajo Nation permits camping on the river.	A change has been made in the document.	Yes
Capital Trail Vehicle Association	23	3	Demand for dispersed camping and access to camp sites from designated routes.	In “Extensive Recreation Management Areas (ERMAs)” which are areas not under special management allow: Alternative C - Dispersed vehicle camping would be allowed within 150 feet of the centerline of designated route on each side. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. Dispersed camping would be encouraged in previously disturbed areas. Alternative D - Dispersed vehicle camping would be allowed 300 feet of the centerline of the road on each side. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. Dispersed	No

REC – Recreation					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
				camping would be encouraged in previously disturbed areas. Existing “spurs” could be utilized to access primitive camping sites unless the area is specifically restricted.	
Capital Trail Vehicle Association	23	4	Commenter states that BLM is designing the RMP in favor of exclusive uses, particularly non-motorized recreation.	The BLM Manual at 1616.7 states in 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. FLPMA further requires public lands to be managed under the principles of multiple use and sustained yield. The BLM must take a broad view under its multiple-use, sustained yield mandate.	No
Blue Ribbon Coalition	24	3	Commenter objects to standard operating procedures (SOP) regarding a permittee leaving a vehicle unattended for 48 hours.	In this case, “permittee” refers to the holder of a land use authorization (right of way, oil/gas well, etc.) not a recreational permit.	No
Blue Ribbon Coalition	24	5	Commenter states the final plan should educate the non-motorized visitors about when and where they might encounter traffic, where trails are to be shared, encourage slower speeds in this area, reroute some trails to accommodate various users and disperse all forms of recreation to minimize conflicts.	In the final RMP, designated OHV routes will be portrayed by a map entitled "Field Office Travel Plan and Map". This map is then the basis for route signing and enforcement. The field office will prioritize actions, resources, and geographic areas for implementation. The implementation goals include completing signage, maps, public information, kiosks, and working with partners. The placement of signs, kiosks, informing and educating the public recreation users will be implemented after the signing of the RMP and will not be decided in the RMP DEIS. The implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and funding, etc.	No
Blue Ribbon	24	8	The final RMP should include discussion of the importance	The BLM used the scoping process to determine a	No

REC – Recreation					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Coalition			of involving the recreationists affected in considering recreation decisions.	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. When the time comes for considering recreation decisions there would be opportunity for full public participation and input.	
Blue Ribbon Coalition	24	9	How will BLM encourage the location of recreation activities along highways and near the “population centers” while still protecting the scenic quality?	These will be implementation decisions and will undergo NEPA analysis. Any facilities developed will have to meet visual resource management objectives for the locations.	No
Blue Ribbon Coalition	24	11	Commenter states that most alternatives in the plan seek to require a SRP (special recreation permit) system, seemingly without thought to the intense demand on agency staffing resources that would be required to enforce the SRP system.	Recreation use in the Monticello planning area (PA) has continued to grow in popularity since the approval of the 1991 RMP. The wide range of recreational opportunities available and the spectacular scenery, both within the PA and in the nearby national parks and monuments, draws many visitors to the area. With the number of visitors continuing to grow, recreation activity is Expanding farther into the backcountry, and resource and user conflicts are becoming more common, more intense, and more difficult to manage. The need is for a permit system to promote the optimum recreation experience and resolve endangerment of other resource values in areas being "loved to death" by growing recreation use. Regarding staffing resources: There is no requirement in NEPA to do the detailed analysis that the commenter demands; this is an implementation issue outside the scope of the current planning effort.	No
Blue Ribbon Coalition	24	12	Arch Canyon does not warrant group size limits, it does not warrant a permit system for groups under 25 under current use levels.	Letters from the USFWS concerning on-going issues with Mexican spotted owl habitat in Arch Canyon, and discussions in coordination with BLM and UDWR, are the basis for	Yes

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				choices made by the ID team in evaluating draft alternatives for Arch Canyon. For Arch Canyon, the FEIS will not be requiring permits or group size limits for private use for any user group except motorized groups of 50 vehicles or more. Special Recreation Permits will be required for any organized or commercial groups.	
Southern Utah Wilderness Alliance	26	18	The existing relative demand for various recreation opportunities is poorly defined.	The commenter does not provide BLM with any information or data; they suggest the Monticello FO should conduct a survey similar to Moab's. However, a range of alternatives for various recreational opportunities is presented by the BLM.	No
Southern Utah Wilderness Alliance	26	21	The plan never considers whether current or proposed ORV use levels are sustainable over the long run.	The BLM will continue to monitor the impacts to resources from all uses and will make adjustments as necessary to sustain these resources.	No
Southern Utah Wilderness Alliance	26	83	The BLM must compare the trade offs, if any, between the environmental and recreational benefits of an alternative even more protective that alternative E with preferred alternative.	In the Monticello DRMP/DEIS, Alternatives B and E emphasizes the protection and preservation of natural resources and minimizes human activities, over commodity production and extraction and motorized recreation access. Alternative E best protects and preserves historic, cultural and natural resources fulfilling both the requirements of FPLMA and NEPA. 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	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				participation was essential in this process and full consideration was given to all potential alternatives identified. 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.	
Southern Utah Wilderness Alliance	26	84	The BLM should revise and choose Alternative E for providing the most protective and reasonable criteria and restrictions on SRPs.	The DRMP/DEIS analyzed a range of alternatives in issuance of SRPs. SRPs allow the BLM to impose protective stipulations on users, thereby protecting the resources present and reducing user conflicts. As the permits issued are increased, resource protection would also be enhanced. Increasing the number of SRPs with specific stipulations to protect and preserve cultural and natural resources would result in more protection and a less likelihood of impact. Land use planning is a tiered process ranging from broad general allocations and management prescriptions to subsequent site-specific authorizations. The issuance of a SRP is a site-specific implementation level authorization, which requires full compliance with NEPA, including analyzing the direct, indirect and cumulative impacts associated with each proposal.	No
Southern Utah Wilderness Alliance	26	85	There is a restriction in Alternative E for car camping of more than 10 vehicles or more that 50 people before an SRP is required. This conflicts directly with the first limitation on group size of 15 people for overnight use in ERMA.	A change has been made in the document.	Yes
Southern Utah Wilderness Alliance	26	86	The BLM has failed to take a hard look at the environmental impacts stemming from issuance of SRPs.	The DRMP/DEIS analyzed a range of alternatives in issuance of SRPs. SRPs allow the BLM to impose protective stipulations on users, thereby protecting the resources present and reducing user conflicts. As the permits issued are increased, resource protection would also be enhanced. Increasing the number of SRPs with specific stipulations to	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				protect and preserve cultural and natural resources would result in more protection and a less likelihood of impact. Land use planning is a tiered process ranging from broad general allocations and management prescriptions to subsequent site-specific authorizations. The issuance of a SRP is a site-specific implementation level authorization, which requires full compliance with NEPA, including analyzing the direct, indirect and cumulative impacts associated with each proposal.	
Southern Utah Wilderness Alliance	26	98	The realities of recreation participation trends are overlooked in the formulation of alternatives and in the analysis of the impacts of the alternatives.	Recreation trends are discussed in the DRMP on page 4-345.	No
Southern Utah Wilderness Alliance	26	100	The draft EIS does not discuss the benefits of non-motorized recreation on public lands.	The BLM under its multiple use mandate has considered the needs of a wide variety of recreationists in the DRMP/EIS alternative formulation.	No
Southern Utah Wilderness Alliance	26	105	The BLM must recognize that all recreation participation (and use of public lands) has been increasing and is likely to continue to increase.	The DRMP addresses increasing recreational use. Refer to pages 3-84 and table 3.21 in the DRMP.	No
Southern Utah Wilderness Alliance	26	106	Personal safety and injury – The BLM must analyze the cost associated with off-road motorized recreation. The BLM must consider the need for law enforcement to ensure OHV rules and regulations are followed and the cost this imposes on society.	Comment is acknowledged and is administrative in nature and outside the scope of the document.	No
Southern Utah Wilderness Alliance	26	107	The BLM must consider the need for law enforcement to ensure OHV rules and regulations are followed and the cost this imposes on society.	Comment is acknowledged and is administrative in nature and outside the scope of the document.	No
Southern Utah Wilderness Alliance	26	108	BLM must recognize that increased off-road motorized recreation implies the need for increased restrictions, and increased law enforcement, not opening more land for cross-country travel.	The commenter is incorrect in stating that the BLM is opening more land up to cross country travel. OHV use including cross country travel has been limited in the preferred alternative to two areas totaling 2,311 acres. See Appendix	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				N page N-19 for OHV designations in each alternative. In the FEIS, 97 acres are open for cross-country travel.	
Southern Utah Wilderness Alliance	26	109	The BLM should examine and acknowledge the benefits of public land recreation, especially in the context of surrounding National Parks, National Monuments, State Parks, Forest Service lands and other BLM lands in the planning area.	The commenter has not provided enough information in this comment to formulate a response.	No
Lynell Schalk	29	6	Dark Canyon ACEC: Under Alternative B, the area is closed to OHV use, but there is no mention of non-motorized/mechanized use. In Preferred Alternative C, the area is closed to both OHV and mechanized use. This appears to be an oversight in the document. (Reference: Under Alternative B, pg. 2-39, Vol. 1).	Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Under alternative B mountain bikes would only be allowed on routes designated open for motorized use.	No
Lynell Schalk	29	14	What is the current level of OHV registrations in San Juan County? The figures provided were from five years ago in 2003 (Reference: pg. 3-77, Vol.1).	The DRMP was completed using the best available information at the time. The data used is believed to be sufficient to make a programmatic analysis of the impacts of multidisciplinary decisions on management direction.	No
Lynell Schalk	29	26	The DRMP is inconsistent in its application of the "no pets" rule. In an area as sensitive as the canyons of Cedar Mesa where there has been documented damage by dogs, there should be tighter controls, not the same old ones. It is my understanding that the current requirement that dogs be "under control" in Grand Gulch is not working. They either need to be excluded or on a leash at all times. The leash requirement is generally unenforceable once the owner is out of sight of BLM personnel. There should be exclusion of dogs in Grand Gulch, an area that is already too heavily visited by humans. In other less sensitive areas, dogs should not be allowed in or on archaeological sites.	In the proposed plan, a management prescription has been added to exclude pets and stock animals form cultural sites field office wide. It states “Domestic pets and pack animals are not allowed in cultural sites or on archaeological resources as defined in ARPA”. Under the Cedar Mesa SRMA, the proposed plan will state “If resources or the visitors' experiences are adversely impacted, pets and or stock animals may be limited or prohibited in canyons requiring permits”.	Yes

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Lynell Schalk	29	33	Comb Ridge Cultural Special Management Area: (Reference: pg. 2-8, Vol. 1) No mention is made regarding mechanized uses.	Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Under the preferred alternative, mountain bikes would only be allowed on routes designated open for motorized use. This area would be designated as a designated road/trail area in the PRMP.	No
Lynell Schalk	29	34	In the "Butler Wash East of Comb Ridge" section, cows and bikes are apparently allowed in the canyons, but domestic pets are excluded. The way I read this, the BLM is authorizing mountain bikers to ride their bikes right into the ancient cliff dwellings as long as they don't bring their dog along. Cows are also welcome? Where is the sense in this?	Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Mountain bikes would only be allowed on routes designated open for motorized use. Areas unavailable for grazing can be found in the bulleted management prescriptions on page 2-17 and 2-18. Portions of the West Butler Wash Canyons would be closed to cattle. In the proposed plan, the Butler Wash Area East of Comb Ridge would be open to pets but they would be excluded from entry into cultural sites.	No
Lynell Schalk	29	35	Outlaw Canyon and South Cottonwood Wash: (Reference: pg. 2-9, Vol. 1). No mention is made regarding non-motorized/mechanized uses.	Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Mountain bikes would only be allowed on routes designated open for motorized use. The Tank Bench SRMA would be designated as closed to OHV use, including mechanized use.	No
Lynell Schalk	29	36	Beef Basin Cultural Special Management Area (Reference: pg. 2-9, Vol. 1). No mention is made regarding non-motorized/mechanized uses. Cows and bikes area allowed in all alternatives. Mechanized uses cause considerable impacts and should be discussed and analyzed in the draft.	Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Mountain bikes would only be allowed on routes designated open for motorized use. Livestock use and limits on group size can be found in the bullets listing management prescriptions on page 2-10 under the Beef Basin Cultural Management Area. Under the preferred alternative, livestock may be limited if cultural resources are impacted and groups are limited to 12.	No
Lynell Schalk	29	37	McLoyd Canyon -- Moon House Cultural Special Management Area (Reference: pg. 2-10, Vol. 1). No mention is made regarding non-motorized/mechanized uses. Same as above.	Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Mountain bikes would only be allowed on routes designated open for motorized use. Management of foot travel visiting the cultural sites and restrictions on pack animals and pets can be found	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				in the bulleted management prescription under the McLoyd Canyon-Moon House Cultural Special Management Area.	
Lynell Schalk	29	38	This section leaves out numerous "trends" currently developing in the MFO that should have been addressed in the DRMP (Reference: pg. 3-84, Vol. 1). These include paint ball wars, canyoneering, mountain biking, paragliding, geocaching, bungi jumping, etc.	The BLM under its multiple use mandate has considered the needs of a wide variety of recreationists in the DRMP/EIS alternative formulation.	No
National Outdoor Leadership School	34	1	In many instances significant limitations on groups sizes are imposed where previously there was no limit, such as limits on commercial mesa top camping within the proposed Cedar Mesa SRMA. Within certain high-use areas, restrictions make sense, imposing sweeping regulations over a large SRMA is unnecessary and unmanageable. A process that ends with new restrictions on group size should begin with an inventory of impacts to demonstrate a quantifiable concern.	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.). The range of management prescriptions was determined through the planning process, including involvement by the BLM Interdisciplinary team and public scoping.	No
National Outdoor Leadership School	34	2	This DRMP also represents a noticeable shift from dispersed camping within SRMAs to a preference by the Monticello FO for camping only at designated sites. In high-traffic areas, limiting camping to designated sites is logical, but in many cases such a shift would be counter-productive. Dispersed camping that follows a solid Leave No Trace ethic, as is practiced by NOLS and many commercial operators within the Monticello FO's SRMAs, has minimal impact due to careful selection of a durable camping surface. A designated campsite, by contrast, is typically located on flat dirt and would suffer visible, significant wear and tear. Limiting the camping strictly to designated sites also presents management problems for the BLM. How does the BLM proposed to manage use of a remote backcountry campsite? When and how are campsites designated? How would the MFO monitor campsite visitation? If there's a thunderstorm that impedes a group's ability to reach a designated campsite, where is there room in the regulations for a	Areas limited to designated sites are only found in SRMAs. The majority of the field office will be open to dispersed camping. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis. The DRMP/DEIS assumes that there will be funding for implementation of the travel plan which will include public education, enforcement/prosecution, vandalism, and Areas limited to designated sites are only found in SRMAs.	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			contingency plan?		
National Outdoor Leadership School	34	3	Once recreation users move beyond McLoyds Canyon and Fish and Owl Canyons use drops off significantly. The restrictions in alternative C for a maximum group size of 12, and with groups of 8-12 required to camp at designated sites only, seems unnecessarily restrictive. Likewise, requiring groups of 24 to camp at designated campsites on mesa tops outside of these specific high-use areas is not practical, nor is it the best option for the resource.	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.). The range of management prescriptions was determined through the planning process, including involvement by the BLM Interdisciplinary team and public scoping.	No
State of Utah	4	72	It is unclear in Chapter 3 whether ROS classifications are carried forward as part of the action alternatives and whether ROS classifications will change by alternative.	The Recreational Opportunity Spectrum (ROS) will not be carried forward in any of the action alternatives. A statement has been added to section 3.11.2.1 clarifying this. Management decisions will be based on special designations such as SRMAs, ACECs, National Historic designations, WSAs, ISAs, ERMAs, Wild and Scenic River recommendations, Non-WSA lands with wilderness characteristics, etc.	Yes
State of Utah	4	73	Please clarify whether the BLM intends to require permits and payment of fees in order to travel across SRMAs where the intended destination is on state land. Also, BLM should clarify how it intends to manage non-recreational use of SRMAs and non-BLM inholdings within SRMAs.	Travel through SRMAs to state land and non-recreational use of SRMAs would be managed as administrative use and fees would not be charged.	No
Broads Healthy Lands	41	12	Section 3.11.2.3 of the DRMP references "a growing level of conflict between motorized and non-motorized users of the planning area (see Section 3.10.4.3 below)." However, no such section exists in the document. Please locate this missing section and include it in the Final RMP.	A correction has been made in the document. It states see Section 3.11.4.3 User Conflicts.	Yes
Broads Healthy Lands	41	15	There is an inexplicable bias toward off-road vehicle use/users and against noncommercial groups as illustrated in 3.11.2.4.1 that requires a Special Recreation Permit for ORV events involving 50 or more vehicles on BLM-administered public lands but then requires a SRP for recreation use on public lands by organized non-commercial	Requirements for SRPs are managed under the BLM Recreation Permit Manual. Any group determined to be an organized group is required to obtain a permit. This includes groups traveling by foot or OHV. It is at the discretion and is the responsibility of the FO to determine which groups are organized. OHV groups that have less than 50 vehicles and	No

REC – Recreation					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			groups of greater than one person, at the discretion of the FO Manager. How is it that two members of a non-commercial group such as Great Old Broads for Wilderness could require a SRP but 49 ORV users wouldn't?	are not an organized or commercial group would not require a permit.	
Canyon Country Heritage	43	1	CCHA finds the use of the term ORV as noted in "Acronyms and Glossary" Volume 3 page X-23 to be defined only one way; "Off Road Vehicle (an older acronym, replaced by OHV.)" This is -- perhaps inadvertently -- confusing and misleading. ORV is also used throughout the DRMP to mean "Outstanding Remarkable Values" (example: Volume 2, chapter 4, page 4-412.) The inconsistency of the term to a layperson could be perplexing, especially when using ORV and OHV in the same description of an area (see Volume 2, chapter 4, page 4-414, 4.3.14.4.4 "Alternative D" as example.)	The acronym ORV is used in the context of Wild and Scenic Rivers and is defined in several locations in the document. Most notably, under the Wild and Scenic section of Appendix H, Special Designations page H-67. OHV is defined on page X-32 in the Acronyms and Glossary section.	No
Bluff Landowners Coalition	48	3	Domestic pets are excluded from Outlaws Canyon/Lower Cottonwood & Butler Wash areas adjacent to our residences/properties under Alt. B, C, and D. The DRMP makes no mention regarding non-motorized/mechanized uses in this area (Reference: pg. 2-9, Vol. 1). Cows and bikes are allowed -- including within archaeological sites -- based on your proposals. As mountain bikes and cows cause more impacts than domestic pets, where is the sense in this?	The proposed plan will allow domestic pets into Outlaws Canyon/Lower Cottonwood & Butler Wash with the new restriction that they will not be allowed into cultural sites. Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Under the preferred alternative, mountain bikes would only be allowed on routes designated open for motorized use. The proposed plan states "Available for livestock use but it may be limited if cultural resources are impacted."	Yes
The Nature Conservancy	49	12	We vigorously oppose allowing any dispersed camping in the potential Indian Creek SRMA, as provided in Alternative C. To protect sensitive species and other biological values, plus minimize user conflicts between recreational users and Indian Creek Cattle Company, camping must be allowed only in designated sites (Alternative B).	An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current Indian Creek management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA was a key	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				component of the analysis. 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. The proposed alternative provides a balance of recreational use while providing resource protection. The proposed plan states “Dispersed camping would be allowed in the Indian Creek Corridor, except within the established designated camping zones: Bridger Jack Mesa, Indian Creek Falls, and Creek Pasture. Camping within these zones is limited to designated sites."	
The Nature Conservancy	49	13	The October 21, 2005 Finding of No Significant Impact and Record of Decision for the Environmental Assessment UT-090-00-47 Indian Creek Corridor Plan and EA signed by Sandra A. Meyers states "BLM may close undesignated dispersed campsites if future user or resource conflicts warrant." This document also outlines a two-year trial period to pack-out human waste/sanitation items and garbage. The results of Dr. Foti's research undoubtedly demonstrate that the trial pack-in/pack-out policy has failed in the two years since the ROD was signed. During the Indian Creek EA process we supported the trial period and monitoring program to evaluate compliance. Unfortunately, at present environmental degradation continues to occur and human sanitation issues are an additional cause for great concern. Therefore, in the Final RMP we strongly recommend closing the entire Indian Creek Corridor to undesignated dispersed camping. We urge the BLM to designate campgrounds/campsites (Bridger Jack Mesa, Indian Creek Falls, and Creek Pasture) as per the Corridor Plan and provide facilities to decrease the spread of impacts from campers. Failure to do so would allow serious impacts to	An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current Indian Creek management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA was a key component of the analysis. 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. The proposed alternative provides a balance of recreational use while providing resource protection. The proposed alternative states “Dispersed camping would be allowed in the Indian Creek Corridor, except within the established designated camping zones: Bridger Jack Mesa, Indian Creek Falls, and Creek Pasture. Camping within these zones is limited to designated sites."	No

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			perpetuate.		
BlueRibbin Coalition	54	3	Under all alternatives, the primary framework for recreation management in the Monticello PA is the Special Recreation Management Area (SRMA). This is used to define the following components of the recreation program: OHV designations, recreation permitting, developed recreation facilities, campsite designation, tourism, and heritage tourism. SRMAs are discussed below to provide the reader with an understanding of how this concept would be used to manage recreation in the Monticello PA> The management tools and techniques that would be used to support these concepts are discussed within each alternative. Chapter 2 page 2-21 We were not able to find any information regarding the Settings, Targeted Outcomes, Market and Benefits as described in Appendix E. The public needs more explanation of what those settings mean and how they may affect decisions in the future. We understand that may be difficult, but it is unacceptable not to at least attempt to have some discussion of the SRMA management guidelines.	After completion of the RMP process, those SRMAs that do not currently have RAMPs will need to develop a site specific RAMP, subject to full compliance with NEPA.	No
EOG Resources	60	19	On page 2-24, the BLM proposes to designate the San Juan River Special Recreation Management Area (SRMA) as available for oil and gas leasing subject to NSO stipulations under all of the action alternatives. See Monticello DRMP/EIS, pg 2-24, Table 2.1. EOG objects to this proposal and encourages the BLM to continue existing management, which would allow for oil and gas leasing subject to special conditions. See Monticello DRMP/EIS, pg	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,	No

REC – Recreation					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			2-24, Table 2.1. Similarly, EOG objects to the proposal under the action alternative to prohibit vehicle access from Comb Wash downstream to Lime Creek, and below Mexican Hat Bridge. See Monticello DRMP/EIS, pg. 2-25, Table 2.1. The BLM has not explained why these restrictions are necessary to protect the resource.	concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. BLM feels that the range of alternatives reasonably covers the options.	
EOG Resources	60	20	Cedar Mesa/Grand Gulch Plateau Special Recreation Management Area. On page 2-25, the BLM proposes that under the action alternatives, the "Grand Gulch SRMA would be changed to the Cedar Mesa Cultural Special Recreation Management Area." Map 30, which depicts SRMAs under Alternative A, the No Action Alternative, identifies the Grand Gulch SRMA and not a Cedar Mesa SRMA. Map 30 does not comport with the management action on page 2-25, which suggests that the Cedar Mesa SRMA would still exist under Alternative A. On Maps 31-34, which depict SRMAs under the action alternatives, the BLM identifies a Cedar Mesa SRMA, even though the management prescription on page 2-25 suggests that this area would become the Grand Gulch SRMA. The BLM must review the management prescription on page 2-25 and ensure that Maps 30-34 reflect the proposed management prescription.	The proposed plan now eliminates all CSMA's or C-SRMA's and proposed to manage them as SRMA's. The Cedar Mesa C-SRMA is now the Cedar Mesa SRMA and incorporates the Comb Ridge and McLoyd Moonhouse CSRMAs as recreation management zones within the Cedar Mesa SRMA. The acreage for the Cedar Mesa SRMA totals 407,098. The PRMP and FEIS have been updated to reflect these changes. Maps of the proposed SRMA's have been created and will include the new Cedar Mesa SRMA.	Yes
PacifiCorp	61	3	Cumulative Impacts, Recreation (Sections 4.4 and 4.4.10, Pages 4-621, 6177) Cumulative impacts are defined on page 4-621 as individually minor but collectively significant actions that occur over time. This definition adds that:"…the effect of any single action cannot be determined by considering that action in isolation". While we do not take exception to this concept, the conclusions under Recreation pertaining to	The list of past and present actions that have or may have an impact on recreation listed under Cumulative Impacts 4.4.10 was the result of an Interdisciplinary Team. The Monticello Field Office stands by its determination of impacts.	No

REC – Recreation				
Commenter Name	**Record ID & Comment Number**	**Comment Text**	**Response to Comment**	**Doc Mod**
		environmental consequences of utility corridors do not necessarily appear valid. Section 4.4.10 states that "Past and present actions that have had and are having impacts on recreation include…utility corridor development…" With respect to transmission lines, impacts other than perhaps visual disruption are generally minor and of short duration. Periodic access/egress to facilities is necessary, but this does not comprise a frequent event. Consequently, the level of disruption from a utility corridor is relatively minor when compared to mineral development, fire and fuels issues, grazing and recreational pursuits -- other occurrences with which utility corridor development is grouped. Similarly, transmission corridors do not generally accommodate OHV use; and as access roadways are expensive to build and maintain, only minimal vehicle accommodation is provided. Recommended Revision/Action PacifiCorp recommends that the relationship between cumulative uses and corridor use be clarified to exclude power transmission as a "significant action" resulting in disruption to the environment. PacifiCorp does not consider transmission corridors, including periodic work within rights-of-way and occasional access, as representing a comparable level of impact as other land uses cited. Vegetation, if consisting of low-growing native species such as shrubs or grasses, is generally allowed to reestablish beneath transmission lines. Consequently few significant surface impacts would be associate with corridor use and periodic maintenance activities.		

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
CrownQuest	62	19	The BLM identifies "developed recreation sites" as avoidance areas for ROWs. The BLM should clearly define the term "developed recreation sites" in the Monticello RMP/EIS.	Developed recreation sites both existing and proposed are found on Page 2-22 under Management Common To All Action Alternatives.	Yes
San Juan County	7	35	Pg. 2-21 - The County is concerned that BLM establishes SRMA's to charge fees without providing facilities.	BLM policy directly ties the charging of fees to the level of facilities provided. Recreational site fee establishment is out of the scope of this document.	No
San Juan County	7	36	Pg. 2-22 - The BLM should insure that providing facilities and services for other agencies doesn't take away from management needs that occur on BLM lands. In particular, the NPS Needles District should provide camping facilities for its visitors within the NP since there is ample room for facilities and because the NPS has a larger budget.	The BLM priority is to provide facilities and services for BLM public land users.	No
San Juan County	7	40	Pg. 2-29 - The first bullet concerning camping under management common to all alternatives seems to be in conflict with Alternatives A, C, and D. Please clarify.	The second part of the first bullet under Management Common to All Action Alternatives stating "Camping outside of the riparian corridor within this area would be limited to designated campsites only" is incorrect. Camping management prescriptions vary with each alternative. A change has been made in the document. The camping management prescription for the proposed plan is: Dispersed camping would be allowed in the Indian Creek Corridor, except within the established designated camping zones: Bridger Jack Mesa, Indian Creek Falls, and Creek Pasture. Camping within these zones is limited to designated sites.	Yes
San Juan County	7	41	Pg. 2-29 - The County encourages BLM to address the safety issue in Indian Creek caused by rock climbers who park and obstruct traffic within the narrow highway corridor.	Chapter 2, page 2-29 states management of the Indian Creek Corridor would be in conformance with the guidance outlined in the Indian Creek Corridor Plan. Bullet number 10 listed under the guidelines states “parking areas would be developed”.	No
San Juan	7	57	Pg. 3-75, section 3.11.2.1 - It is unclear whether the BLM is	The Recreational Opportunity Spectrum (ROS) has not been	Yes

REC – Recreation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
County			carrying ROS into the new RMP. ROS is described in the current plan and on map 29 but there is no other analysis across alternatives. However, it appears that the primitive designation is used in effect to create "defacto wilderness" and VRM I areas smaller than 5,000 acres. BLM needs to clarify use of ROS in the Draft RMP.	carried forward in any of the action alternatives. A statement has been added to section 3.11.2.1 clarifying this. Management decisions will be based on special designations such as SRMAs, ACECs, National Historic designations, WSAs, ISAs, ERMAs, Wild and Scenic River recommendations, Non-WSA lands with wilderness characteristics, etc.	

RIP – Riparian					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Environmental Protection Agency Region 8	1	10	EPA is concerned that heavy recreational use along a certain segment of Indian Creek and in Arch Canyon is resulting in adverse impacts to riparian areas. EPA recommends designating these segments as WSRs to restore and protect riparian and recreational values.	In 2007 in response to a report written by Charles Schelz for the Southern Utah Wilderness Association the BLM did assessments in Arch Canyon and found it to be In Proper Functioning Condition. It is a typical intermittent, interrupted stream that limits potential of riparian wetland vegetation. Even though the road crosses the stream at 60 sites, it was found to have little to no impacts to the riparian areas because most of the road length is on the higher terraces and most of the crossings are at a right angle to the channel. Only 20 out of the 60 crossings (33%) are in riparian areas. Indian Creek is also similar to Arch Canyon in that it is for the most part in proper functioning condition. It is a typical intermittent, interrupted stream that limits potential of riparian wetland vegetation. As per BLM Manual 8351-Wild and Scenic Rivers-Policy and program .32 C, all eligible rivers are considered in the EIS for the planning effort as to their suitability for congressional designation into the National Wild and Scenic Rivers System. The Indian Creek and Arch Canyon segments were both evaluated during the Wild and Scenic river eligibility process. Neither of these segments is carried forward in the preferred alternative as suitable for inclusion for congressional designation into the Wild and Scenic National System. A full range of alternatives was proposed with all eligible segments proposed for suitable in Alternatives E and B and no edible segments proposed for suitable in Alternative D. A detailed description of the Wild and Scenic Study process can be found in Appendix H, page H-67.	No
U.S. Fish and Wildlife	2	9	According to Table 2.2, the Wildlife and Fisheries Resources impacts to Riparian Resources include "some loss of riparian	The PRMP/FEIS added: “Compliance with Standard 2 would minimize adverse impacts to riparian areas by requiring	Yes

RIP – Riparian					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Service			vegetation from elk grazing." This impact should also be applied to Cattle Grazing.	changes in grazing management wherever monitoring shows degradation of riparian areas when PFC is not achieved."	
U.S. Fish and Wildlife Service	2	10	Beneficial or adverse impacts from beavers on riparian resources are not discussed in Table 2.2.	The oversight has been corrected and added into Table 2.2.	Yes
U.S. Fish and Wildlife Service	2	11	Minerals and Energy Resources are not mentioned as a source of impacts to the Riparian Resources on page 2-111 on Table 2.2. Land disturbing activities can affect riparian areas; therefore, adding a no surface occupancy buffer around riparian areas would benefit the riparian resources.	This oversight has been corrected by adding a minerals section to Table 2.2 in the PRMP/FEIS	Yes
U.S. Fish and Wildlife Service	2	14	On page 3-88 in section 3.12.1: The first sentence of this section should be revised for clarity as the 1.2 percent describes the percentage of riparian acres within the BLM administered lands (of ~1.8 million) rather than 1.2% of riparian acres within the Monticello Planning Area. Instead, the BLM administers ~70% of riparian acres in the planning area.	The correct figure is 28,994 acres (0.16 percent) of lands that are riparian and wetland resources within the Monticello PA.	Yes
U.S. Fish and Wildlife Service	2	15	If possible, on page 3-90 in Table 3.23, indicate the acres and miles (by drainage) which are administered by the BLM.	The data provided are from a study done in 1990. The mileage and the acreage were calculated by drainage.	Yes
U.S. Fish and Wildlife Service	2	29	Page 4-437 in section 4.3.15.2.6.1. In riparian, the statement reads, "Although the riparian zone is listed as NSO, this stipulation could be waived if necessary for ....surface occupancy" contradicts other statements throughout the document. We concur with the NSO category for oil and gas surface-disturbing activities in riparian areas and believe it should not be waived. NSO should mean NSO.	See Appendix page A-3 table A-1, explains exception criteria. The BLM determined that the vast majority of the riparian areas in the MFO could be avoided consistent with the 200 meter provision of the standard lease terms and conditions so it is not necessary to show provisions on the referenced oil and gas category maps. In Appendix C (page C-5) of the DRMP/EIS it states that an exception to these restrictions can be granted if 1) there are not practical alternatives or, 2) all long term impacts can be fully mitigated, or, 3) the activity will benefit and enhance the resource values. Appendix H provides the guidance for	No

RIP – Riparian					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				pipelines crossing stream crossings.	
U.S. Fish and Wildlife Service	2	39	Page 4-593 in Table 4.211. Wildlife Habitat OHV Use: For the preferred alternative, 80% of riparian habitat would be open to OHV limited use, while 135 acres would be completely open to OHV use. Especially for the limited use (which limits access to roads, not all acres), it would be useful to know number of stream crossings per alternative in order to better evaluate the alternatives' impact on riparian habitat.	While it may be useful to have that information, BLM does not have that detail. Table 4.211 does provide a general comparison of impacts by alternative even though it is based on acres and not number of stream crossings.	No
Southern Utah Wilderness Alliance	26	15	Existing conditions should include the impact of ORVs and other uses on riparian areas.	The impacts of travel on riparian resources are discussed in Chapter 4 of the DRMP/EIS. In all action alternatives, motorized travel in riparian areas is reduced. In fact, Alt-A has nearly 611,310 acres open to cross country travel. Whereas Alt-C only has 2,311 acres open to cross country travel. This is discussed on pages 4-528-534.	No
Western Watershed Project, Inc	50	1	The riparian goal of PFC is totally inadequate because PFC is only a minimal hydrologic evaluation, is highly subjective and biased. PFC does not address habitat or water quality. Regarding stubble height standards, they are ineffective because they are typically not enforced, are based on low palatability species of sedges, do not represent use in adjacent riparian areas and little strips of sedges along a greenline do not filter sediment. For filtering sediment, intact riparian areas are needed to reduce erosion and filter sediment. These deficiencies should be addressed by closing all riparian areas to livestock.	The PFC assessment refers to a consistent approach for considering hydrology, vegetation, and erosion/deposition attributes and processes to assess the condition of riparian-wetland areas. PFC is a state of resiliency that will allow a riparian-wetland area to hold together during high-flow events with a high degree of reliability. This resiliency allows an area to then produce desired values, such as fish habitat, neotropical bird habitat, or forage, over time. A riparian-wetland area is considered to be in proper functioning condition when adequate vegetation, landform, or large woody debris is present to: dissipate stream energy associated with high waterflow, thereby reducing erosion and improving water quality; filter sediment, capture bedload, and aid floodplain development; improve flood-water retention and ground-water recharge; develop root masses that stabilize streambanks against cutting action; develop diverse ponding and channel	No

RIP – Riparian					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				characteristics to provide the habitat and the water depth, duration, and temperature necessary for fish production, waterfowl breeding, and other uses; support greater biodiversity.	
Western Watershed Project, Inc	50	2	Riparian areas should be placed off limits to livestock, OHVs and other extractive uses due to the severe degradation and the need to "accelerate restoration" as required by FLPMA. Tinkering around with Rangeland Health and PFC assessments with their inherent subjectivity and bias or riparian subtle height measures which are universally abused and have not proven effective is a flawed approach. These should be abandoned in favor of strict, quantitative standards and effectiveness monitoring based on peer-reviewed science and comparisons to reference areas instead of kicking the can down the road while the land, water supply and wildlife suffer for more decades. If BLM cannot assure that funding resources are available to conduct this level of monitoring, then those uses that cannot be adequately monitored must be suspended until resources are available.	The BLM adheres to all laws, regulations, policies, and Executive Orders pertaining to riparian areas. There is nothing in these rules that require the BLM to entirely close all riparian areas to resource uses. In Chapter 2 of the DEIS and in the PRMP, BLM has restricted certain canyons to livestock trailing only, developed seasonal restrictions, closures, and/or forage utilization limits on grazing in riparian areas considered functioning at risk and temporally closed riparian areas considered Functioning at Risk to dispersed motorized camping until PFC is restored.	No
Tom Ratcliff	56	3	I have found an interesting issue related to this and other resource areas of discussion in the Draft. Riparian resources are discussed in at least Fire Management 1.4, Riparian Resources 3.12 and Vegetation 3.18 sections of the document, and of course at 4.3.11. Each of those sections has different and conflicting information. For example, Fire says that riparian habitat is "less than one percent of the MPA". Vegetation is more specific at "20,699 acres"…"only 1 percent of the FO"; Riparian Resources, at 3.12 claims approximately 20,435 acres (1.2 percent). And now the kicker: At 4.3.11 riparian acres are listed at 28,994, based on a GIS database. By my calculation that is	The acreages and percent have been fixed in the PRMP: 28,944 correct acres/1785127 total acres=1.6% riparian Fire Mgt 3.4.5.9 -covers approximately 1.6% Rip Resources 3.12.1 –BLM administers approximately 28944 acres (1.6 percent) of BLM administered lands of riparian and wetland resources within the Monticello Field Office. Vegetation 3.18.1.4 Riparian and Wetland Communities. Approximately 28,944 acres of wetland and riparian areas exist in the Monticello FO.	Yes

RIP – Riparian					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			about a 42% error factor over the lower figure.		
ECOS Consulting	58	2	The DRMP/EIS's presentation of "limited" OHV use in riparian areas makes it sound like OHV use will, in fact, be "limited." However, further review reveals that BLM would designate numerous OHV routes within riparian areas, the opposite of restricting and limiting OHV use in riparian areas. 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. BLM's Monticello DRMP/EIS should analyze and disclose the potential direct, indirect, and cumulative impacts of OHV use to each riparian area, and discuss the different rules for each particular riparian area - depending on the sensitivity and condition of each particular area. Without this information an assessment of direct, indirect, and cumulative impacts is impossible.	The BLM acknowledges that routes in riparian areas can have adverse impacts. However, the majority of the impacts occur when the route was constructed. The designated routes consist of previously created routes. According to Utah State Office Instruction Memorandum 2005-91 related to Utah Riparian Management Policy, no new surface disturbing activities will be allowed within 100 meters of riparian areas unless it can be shown there are no practical alternatives. Thus, new route construction in riparian areas would very seldom occur. On pg. 2-54 of the DRMP/EIS it states that "Where the authorized officer determines that off-road vehicles are causing or will cause considerable adverse affects, the authorized officer shall close or restrict such areas."	No
ECOS Consulting	58	16	Have the riparian studies listed in this Monticello DRMP/EIS been performed by teams of resource specialists, as is required by the BLM's own standards (USDI 1993)? The BLM document that establishes protocols for riparian-wetland assessment states: "Since natural riparian-wetland areas are characterized by the interactions of vegetation, soils, and hydrology, the process of assessing whether a riparian-wetland area is functioning properly requires an interdisciplinary (ID) team. The team should include specialists in vegetation, soils, and hydrology. A biologist also needs to be involved because of the high fish and wildlife values associated with riparian-wetland areas" (USDI 1993). Are the findings of riparian conditions stated in Table 3.23 on pages 3-90 to 3-94, a result of an ID team of specialists as described above? Or are they the results of one or two individuals, such as the range conservationist of	The riparian studies were performed by teams of interdisciplinary specialists. The commenter's request for the names of specific streams and acres affected by each alternative is not necessary to analyze impacts at the land use planning level. The goal of the impact analysis is to compare the alternatives.	No

RIP – Riparian					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			the Monticello Field Office? If there was a team, or even if there wasn't an ID Team, these individuals and their specialties should be listed in Table 3.23 for each riparian area in order for the public and managers to be able to assess the accuracy and validity for these results. If most of these findings are not the result of ID Teams then their results should be suspect and invalid, and should not be used in riparian/wetland planning for the next 10-20 years. Table 3.23 should also list the dates that the riparian assessments were performed. It appears that many of these assessments may be 5-10 years old, and ORV use has dramatically increased in the past 5 years. Multiple year assessments of monitoring are required to truly assess trends.		
EOG Resources	60	21	The BLM estimates that it administers 20,435 acres of riparian areas within the Monticello RA. Monticello DRMP/EIS, pg 3-88. It is not clear whether Maps 23-27, which identify areas to be leased with NSO stipulations, identify the riparian areas in which leasing will occur subject to NSO stipulations. The BLM must clearly identify and map any riparian areas that are subject to the NSO stipulations in the final Monticello RMP/EIS, or clearly define riparian areas so that operators can evaluate potential impacts to their operations.	The BLM determined that the vast majority of the riparian areas in the MFO could be avoided consistent with the 200 meter provision of the standard lease terms and conditions so it is not necessary to show provisions on the referenced oil and gas category maps.	No
EOG Resources	60	22	On page 2-32, the BLM states that surface-disturbing activities would not be allowed within active floodplains or within 100 meters of riparian areas. See Monticello DRMP/EIS, pg 2-32, Table 2.1. The BLM should clarify this Management Common to All Alternatives to indicate that road and pipeline crossings would be allowed in streams and other potential riparian habitats when approved by the BLM and Army Corp of Engineers. As currently drafted, the management action could be viewed as prohibiting all stream crossings within the planning area. This clarification	The Utah State Office Instruction Memorandum 2005-091 regarding Utah Riparian Management Policy specifies a 100 meter buffer for riparian resources. Proposals for mineral development are implementation actions in which the potential environmental impacts would be analyzed on a case by case site specific basis following completion of the land use plan. The BLM determined that the vast majority of the riparian areas in the MFO could be avoided consistent with the 200 meter provision of the standard lease terms and conditions so it is not necessary to	No

RIP – Riparian					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			is particularly important for situations in which the appropriate regulatory agency does not require mitigation.	show provisions on the referenced oil and gas category maps.	
CrownQuest	62	31	It is not clear whether Maps 23-27, which identify areas to be leased with NSO stipulations, identify the riparian areas in which leasing will occur subject to NSO stipulations. The BLM must clearly identify and map any riparian areas that are subject to the NSO stipulations in the final Monticello RMP/EIS, or clearly define riparian areas so that operators can evaluate potential impacts to their operations.	Appendix A is a list of management prescriptions that would apply to all surface disturbing activities, including oil and gas operations. However, the BLM has determined that a NSO stipulation would not be required for oil and gas leases because riparian areas could be avoided under the standard lease terms (moving facilities up to 200 meters). It is not possible to completely map all riparian areas within the Monticello FO on a scale of map suitable for RMP purposes. Requirements for sitting facilities to avoid riparian areas would largely be determined at the project level through appropriate on site reviews.	No
CrownQuest	62	32	Additionally on page 2-32, the BLM states that surface-disturbing activities would not be allowed within active floodplains or within 100 meters of riparian areas. This should be clarified to not automatically exclude all road and pipeline crossings of streams.	Please refer to response to comment 62-31.	No
CrownQuest	62	33	As currently drafted, the management action could be viewed as prohibiting all stream crossing within the planning area.	Please refer to response to comment 62-31.	No
Thomas Ratcliff	79	6	Riparian resources are discussed in at least Fire Management 3.4, Riparian Resources 3.12 and Vegetation 3.18 sections of the document, and of course at 4.3.11. Each of those sections has different and conflicting information. For example, Fire says that riparian habitat is "less than one percent of MPA", Vegetation is more specific at "20,699 acres"…" only 1 per cent of the FO:"; Riparian Resources, at 3.12 claims approximately 20,435 acres (1.2 percent)	Please refer to response to comment 059-3.	Yes
Thomas	79	7	WE HAVE NO RIPARIAN AREA MAP SHOWING THOSE	Specific riparian wetland resources are evaluated on a site	No

RIP – Riparian					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Ratcliff			AREAS THAT ARE PFC, FUNCTIONING AT RISK, ETC. OUT OF 86 MAPS, NOT ONE DELINATES THE PROBLEM AREAS, NOR FOR THAT MATTER THOSE AREAS AT PFC. Why is that?	specific allotment basis during the Permit Renewal process using Standards for Rangeland Health and Guidelines for Grazing Management. The commenter's request for the names of specific streams and acres affected by each alternative is not necessary to analyze impacts at the land use planning level. The goal of the impact analysis is to compare the alternatives.	

SCO – Scope of Document					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
State of Utah	4	4	The state requests that BLM commit to either work toward the energy efficiency goals as outlined in the Governor's May 30, 2006 Executive Order or coordinate alternative energy efficiency increases with the Governor's Energy Advisor.	Any policy changes or coordination between the state and the BLM to improve energy efficiency would be administrative and are outside the scope of the land use planning process.	No
San Juan County	7	11	The State of Utah has a reversionary interest in any roads that may have been granted to the state and local government pursuant to R.S. 2477. Abandonment of the right-of-way by both entities is necessary for a complete resolution for any particular road.	It is beyond the scope of this document to make determinations on R.S.2477 claims. In the Tenth Circuit Court decision – SUWA v. BLM – September 8, 2005, the court noted that ultimately deciding who holds legal title to an interest in real property, including R.S.2477 right of way, "is judicial, not an executive, function." 425 F.3d at 752. Chapter one of the DEIS states at 1.3.3 ISSUES BEYOND THE SCOPE OF THE PLAN Settlement of R.S. 2477 (i.e., right-of-way) claims. The State of Utah and San Juan County may hold valid existing rights-of-way in the PA according to Revised Statute (R.S.) 2477, Act of July 28 1866, chapter 262, 8, 14 Stat. 252, 253, codified at 43 U.S.C. 932. On October 21, 1976, Congress repealed R.S. 2477 by passing the FLPMA. This RMP does not adjudicate, analyze, or otherwise determine the validity of claimed rights-of-way. However, nothing in the RMP extinguishes any valid right-of-way or alters in any way the legal rights the state and counties may have to assert and protect R.S. 2477 rights or challenge in federal court or other appropriate venues.	No
Southern Utah Wilderness Alliance	26	27	The commenter suggests that the DRMP/EIS is the appropriate place to discuss issues of "public education, enforcement/prosecution, vandalism and volunteer coordination"	BLM has the authority to use volunteers or educate the public about resource uses at any time. Also, law enforcement has authority for enforcement and prosecution as appropriate. The items listed are administrative actions and do not require land use planning decisions. The analyses assumes that there will be funding for implementation of the travel plan which will include public education, enforcement/prosecution, vandalism, and volunteer coordination.	No

SCO – Scope of Document					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Grand Canyon Trust	33	1	There is an omission of relevant information from the planning document in the absence of any reference to global climate destabilization. Climate models predict that current trends of higher temperatures and reduced precipitation will continue in the Upper Colorado River Basin leading to a decrease in quantity and quality of river water and severe consequences for human, agricultural uses, wildlife and ecosystems. The MFO has already been affected by the prolonged drought. Soil disturbing activities such as cattle grazing, energy exploration and development and recreation have increased dramatically and these uses destabilize soils. Massive dust storms from soil loss deposit dark-colored dust on mountain snowpacks which absorb heat and melt too soon. Snowmelt storage in watersheds is reduced. The implications of these and other climate effects on management decisions on public lands are not adequately addressed in the DRMP. Modeling and technical information can be accessed from USGS and NOAA.	BLM - Global climate change comment -- suggests changes to text in Chapters 3 and 4. Will this be done. 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.	Yes
Tom Fleischner	218	1	Global climate change is one of the most serious challenges facing the world, yet the DRMP completely ignores climate change. The FRMP needs to thoroughly analyze the impacts of climate change on the planning area and the potential impacts of proposed activities on climate change.	Please refer to response to comment 148-1.	No
Glen Canyon Group, Utah Chapter, Sierra Club	221	2	BLM's "preferred alternative" is not balanced and in fact abnegates their responsibility to protect the wilderness and cultural resources entrusted to their care in favor of satisfying the demands of off-roaders and oil/gas interests. It is our philosophy that a truly balanced decision will be of optimal benefit to the owners of these public lands-the people of the United States, and to future generations.	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	No

SCO – Scope of Document					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Some of the specific comments below will detail ways in which Alternative C should be better balanced.	consideration was given to all potential alternatives identified.	

SD – Special Designations					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
CrownQuest	62	38	CrownQuest observes that the Alkali Ridge National Historic Landmark is not specifically identified on any of the maps in the Monticello RMP/EIS. The BLM must identify the National Historic Landmark on a map.	The 2,146 acre Alkali Ridge National Historic Landmark has been mapped. This map is available from the Monticello Field Office upon request.	No
CrownQuest	62	83	Under all of the action alternatives, the BLM proposes to designate the Alkali Ridge National Historic Landmark as subject to NSO stipulations and as a ROW Avoidance area. See Monticello DRMP/EIS, pg 2-35, Table 2.1. The BLM entirely fails to address the impacts on this proposed management action on oil and gas development. See Monticello DRMP/EIS, pgs. 4-114, 4-123, 4-132, 4-140. A pipeline borders, and perhaps may cross, the Alkali Ridge National Historic Landmark. The BLM's proposed management of the historic landmark will prevent owners and operators of neighboring oil and gas leases from accessing the pipeline, thereby impairing development of the leases. The BLM must analyze the impacts of the proposed management.	Management prescriptions for the ACEC and NHL have been clarified in the PRMP/FEIS to note that exceptions would be granted to allow access to existing utility corridors for maintenance of existing facilities and construction of new facilities. Standard exception language to honor valid existing rights would also apply.	Yes

SOC – Socioeconomics					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
State of Utah	4	2	The BLM, Monticello Field Office should consider the information presented in the Economic and Business Research Study (Phase I) for oil and gas exploration and production in the Uintah Basin in terms of economic benefits of the oil and gas industry.	The BLM acknowledges the oil and gas study referenced for the Uintah Basin. However, the applicability to Monticello is limited. The Monticello Field Office prepared a Reasonably Foreseeable Development (RFD) scenario for oil and gas development over the next 15 years. The development predicted in the RFD was utilized to generate the economic impacts in the Draft RMP/EIS as detailed on pg. 4-340 through 4-344.	No
State of Utah	4	25	BLM's decisions on how to manage its lands directly affect Utah's ability to manage state trust lands to provide revenue for public schools and other beneficiary institutions. The state believes the Draft RMP fails to adequately address two issues, 1) the impact of BLM management decisions on state trust lands, and 2) the need for a substantially more robust program for land tenure adjustments between the BLM and the State of Utah.	Non-BLM lands could be indirectly impacted by RMP decisions both positively and negatively. The analysis in Chapter 4 of the PRMP/FEIS has been modified accordingly. For specifics regarding the impacts on mineral revenue, please refer to response to comment 120-101. The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). A sentence has been added to Chapter 2, Lands and Realty, Management Common to All Action Alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79). In addition, the travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision.	Yes
State of Utah	4	50	Section 1.4.4 – Energy Policy and Conservation Act (Page 1-16). None of the alternatives adequately analyze the impacts from formally or effectively eliminating mineral development in lands subject to Special Designations, in terms of loss of revenue to the United States, State of Utah, local governments and Utah's school trust under EPCA.	Please refer to response to comments 004-2, 25, 53, 54, and 56.	No

SOC – Socioeconomics					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
State of Utah	4	53	Section 4.1 - Environmental Consequences of Alternatives (Page 4-3). The state comments that BLM decisions to withdraw mineral lands from leasing in WSAs, areas with wilderness characteristics, ACECs, and other areas directly affects the economic viability of state trust lands inholdings in those areas, particularly for oil and gas.	Please refer to response to comment 004-25.	No
State of Utah	4	54	Section 4.1.2 Assumptions and Methodology for Mineral Development – Oil and Gas. The RFD must address the fact that BLM withdrawals and special designations directly affect development of oil and gas on SITLA lands. The BLM should assume that, in addition to the loss of oil and gas wells on BLM lands, there will be an additional loss of wells on SITLA lands in proportion to the amount of SITLA land within the proposed special designation under each alternative.	The RFD is a technical report that makes long term projections of oil and gas exploration, development, production and reclamation activity. It is neither a planning decision nor the "No Action Alternative" in the NEPA document. It provides the baseline projection of future activity assuming all potentially productive areas (including SITLA lands) are open for leasing under standard lease terms and conditions. The only exceptions are those areas designated as closed to leasing by law, regulation or executive order. The BLM acknowledges that closure of adjoining public lands to oil and gas leasing may have a potentially negative impact on SITLA's mineral revenue. The closure of WSAs is nondiscretionary, and is beyond the scope of this plan. Non-BLM lands could be indirectly impacted by RMP decisions both positively and negatively. The analysis in Chapter 4 of the PRMP/FEIS has been modified accordingly to reflect the impacts in Alternative E on SITLA inholdings of the discretionary closures of public lands. The number of oil and gas wells foregone on SITLA lands, and the loss of revenue from SITLA wells foregone have been calculated and added to the analysis in Chapter 4.	Yes
State of Utah	4	56	Section 3.13-Socioeconomics (pgs 3-96). BLM decisions to withdraw mineral lands from leasing (WSAs, etc.) directly affect the economic viability of state trust lands inholdings. This should be acknowledged appropriately in the discussion	The decision to manage lands as WSAs was made initially in the Federal Land Policy and Management Act (1976). Lands to be managed as WSAs in the State of Utah were identified in the 1980's. Any state trust land inholdings created by WSA	Yes

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			of socioeconomic impacts.	management is beyond the scope of this plan. Those state land inholdings that are excluded from leasing as a result of the current planning effort have been specifically analyzed in the Socioeconomic section of Chapter 4. Please also refer to response to comment 004-54.	
State of Utah	4	71	The royalty payments for oil reported on page 3-113 exceed the sale value by more than one million dollars. Please verify and explain this anomaly.	BLM agrees that the production and royalty information on page 3-113 is confusing as presented. The information has been clarified and any erroneous figures have been corrected in the proposed RMP.	Yes
Ute Mountain Ute Tribe	6	1	The Ute Mountain Ute Tribe has Tribal trust lands and restricted fee lands within the Monticello RMP Planning Area. The Tribe is concerned about the impacts mining and OHV use may have on the economic value, environmental integrity and quiet use and enjoyment of these lands.	The Monticello RMP includes a Travel Plan, which designates travel routes for OHV use. OHV use will be confined strictly to the designated routes.	No
San Juan County	7	24	San Juan County commends the BLM for the effort that has been expended to better understand and portray socioeconomic impacts in this DRMP. This has been a weakness in previous plans. San Juan County encourages BLM to use studies done by Utah's universities to enhance this information such as the social survey undertaken by USU and the economic studies done by the U of U. Every NEPA action in the RMP should include a discussion on socioeconomic conditions and fully disclose all impacts.	The BLM has reviewed the Utah State University survey of rural counties conducted by the State of Utah. The BLM received preliminary data for San Juan County after completion of the Draft RMPM/EIS. The BLM has incorporated findings in chapter 3 of the PRMP/FEIS as appropriate. In addition, an appendix has been added to the PRMP/FEIS which summarizes the results of this study. The recent research undertaken by the University of Utah's Bureau of Economic and Business Research on oil and gas activities in San Juan County is not yet complete. The unexpected death of the primary researcher has slowed this effort. The BLM has extensively utilized data provided by the Utah Division of Oil, Gas and Mining in its economic analyses of the contributions of various industries. On a broad land use planning level, the BLM has disclosed the socioeconomic impacts from various resource actions as	Yes

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				discussed in Chapter 4 of the DRMP/EIS. It is not practical to separate out the socioeconomic impacts of the many of the specific resource decisions specified in the plan.	
Blanding City-Webb	8	2	The RMP significantly reduces and /or restricts access. Sale of public lands has been put on hold. This has hurt Blanding City's efforts to grow economically and is inconsistent with State, County and local planning. (Letter from Blanding City Planner).	The BLM is aware that there are specific local government plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with local government plans, to the maximum extent consistent with federal law, and inconsistencies between Federal and non-Federal government plans be resolved to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where local government plans conflict with Federal law, there will be an inconsistency that cannot be resolved or reconciled. (CCR 4R).	No
Capital Trail Vehicle Association	23	8	Commenter states that not allowing more motorized access is an infraction of the environmental justice mandate.	On a broad land use planning level, the BLM has disclosed the socioeconomic impacts from various resource actions as discussed in Chapter 4 of the DRMP/EIS. It is not practical to separate out the socioeconomic impacts of the many resource decisions specified in the plan. Any assessment of the social and economic impact of a decision covering a 15-20 year timeframe will have elements of speculation. BLM used the best available data to assess impacts; in many cases, no data was available. In a landscape level plan such as the RMP, qualitative discussions are often all that are necessary (or even possible).	No
Southern Utah Wilderness Alliance	26	96	The draft EIS does not account for the non-market values associated with undeveloped wild lands.	The non-market values to which the commenter refers are not available to the 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), the impacts are irrelevant, since WSA management is outside the scope of the current planning effort. The BLM is unaware	No

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				of any evidence that such studies are generalizable to non-WSA lands with wilderness characteristics The BLM does recognize the potential importance of non-market values relative to managing for wilderness characteristics. The lack of available data makes quantification outside the scope of the DRMP/EIS.	
Southern Utah Wilderness Alliance	26	97	The draft EIS does not address the potential benefits to the local area economics from management to protect the natural amenities of the MFO.	The BLM believes that its action alternatives do provide the public goods SUWA demands, but probably not in the quantities it desires. For example, the Monticello BLM manages approximately 380,000 acres of Wilderness Study Areas, a necessary ingredient of which is opportunity for solitude. The BLM provides within the alternatives a wide range of outdoor recreation activities, and recognizes recreation as the driving force of the planning area's economy. The BLM is required by law to adhere to the standards governing clean air and water, and will continue to follow such laws. The BLM has no statutory authority to "preserve wilderness" beyond those lands designated as such by law. The BLM will continue to manage WSAs under current policy to not impair their wilderness character, an action beyond the scope of the DRMP/EIS. Finally, the BLM has the option to manage non-WSA lands with wilderness characteristics, but not an obligation to do so. As described in Chapter 4, the BLM proposes varying amounts of acreage in Alternatives A through E for management to protect their wilderness characteristics. Whether that acreage is "enough" is a matter of preference, not law or policy.	No
Southern Utah Wilderness Alliance	26	99	The draft EIS fails to address the potential significant costs associated with off-road motorized use.	As described in detail in Chapter 4, the BLM addressed the impacts from travel management to a wide variety of resources under its management. The impacts on resources analyzed in Chapter 4 of the DRMP/EIS included many of the resources enumerated by SUWA, including soils, air quality,	No

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				hydrology, riparian, vegetation, wildlife, and wilderness characteristics. The BLM has never suggested that any of its management decisions are without impacts, including OHV and travel management decisions. The BLM believes that its action alternatives, which greatly reduce both miles of motorized routes and open areas, should have a positive impact on the resources cited. The BLM's responsibility is to disclose and analyze the effects of those decisions; the BLM has fulfilled this responsibility in the analysis disclosed in Chapter 4.	
Southern Utah Wilderness Alliance	26	101	The draft EIS does not address the potential socioeconomic costs associated with coal mining and oil and gas drilling.	The socioeconomic cost associated with oil and gas drilling is discussed in detail on pages 4-340-344.	No
Southern Utah Wilderness Alliance	26	103	The draft EIS does not account for the non-market values associated with undeveloped wild lands.	The non-market values to which the commenter refers are not available to the 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), the impacts are irrelevant, since WSA management is outside the scope of the current planning effort. The BLM is unaware of any evidence that such studies are generalizable to non-WSA lands with wilderness characteristics The BLM does recognize the potential importance of non-market values relative to managing for wilderness characteristics. The lack of available data makes quantification outside the scope of the DRMP/EIS.	No
Southern Utah Wilderness Alliance	26	104	The BLM must make a thorough examination of the full socioeconomic impacts likely to occur if the management alternatives are implemented.	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 (emphasis added) a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by	No

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				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).	
Lynell Schalk	29	15	What is the current usage on the San Juan River? The most	An RMP will never have current, up-to-date information due to	No

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			recent figures provided are from 3 years ago in 2003 (Reference: pg. 3-77, Vol.1). What are the current PILT payments to San Juan County? The most recent figure provided is from 2 years ago in 2006 (Reference: pg. 3-108, Vol.1). Where are the current visitation figures for local attractions? The last figures date back 5 years ago in 2003. The same applies to the amount of spending by travelers, the tourism-related dollars chart and the base funding for recreation and fee demonstration projects (Reference: pg. 3-109 through 3-111, Vol.1). What is the current oil production level? The last figures date back 4 years ago to 2004 (Reference: pg. 3-114, Vol.1). The DRMP indicates that approximately 41 percent of the oils drilled in San Juan County are dry. Is the trend still towards reduction in productive wells or vice versa? It appears that even under a President pushing for American oil development, the fields are drying up. This should be considered in the DRMP in regards to the vast acreage designated as open to oil and gas development.	the amount of time it takes to prepare the document. Numbers are provided for comparative purposes only. PILT payments are outside of the scope of the land use planning process. Furthermore, none of the alternatives would result in significant changes in federal ownership in the planning area. Any future land exchanges or sales would be assessed to determine specific impacts, but in general, actions proposed with the RMP/EIS would not change payments to San Juan County made under the PILT program according to established formulas. See Section 4.1.1.1.2.	
Lynell Schalk	29	18	How can the socio-economic impacts of this plan be fully analyzed with out-of-date and inaccurate statistics? The last employment table is dated 2000, 8 years ago (Reference: Table 3.32 pg. 3-106, Vol.1). What is the current unemployment rate in San Juan county? The most recent figures provided are from 4 years ago in 2004 (Reference: pg. 3-103, Vol.1).	The RMP uses the best available information. The numbers are provided for comparative purposes only.	No
Utah State Office of	31	1	The BLM does not consider multiple use or sustained use mandates as required by FLPMA. None of the alternatives	Please refer to response to comment O31-6.	No

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Education			adequately analyze the loss of revenue from formally or effectively limiting or eliminating the mineral development in many of the lands subject to special designations and restrictive viewsheds.		
Utah State Office of Education	31	2	The RMP must address the fact that BLM withdrawals and special designations directly affect the development of oil and gas on school trust lands. The BLM should assume that, in addition to the loss of oil and gas wells on BLM lands, there will be an additional loss of wells on school trust lands in proportion to the amount of school trust within the proposed special designations under each alternative. This issue is not identified in the RMP. There is no indication what the loss of wells would mean in terms of lost revenue to the United States, the State of Utah, local governments, and Utah's school trust, and the effect of that revenue loss under EPCA. The discussion of coal development and the effect should BLM not lease its available coal in the MPA, is also very limited. The thorough economic impact analysis, if not additional sections, be added.	Please refer to response to comment O31-6.	No
Utah State Office of Education	31	6	The BLM should assume that in addition to a decline in the number of wells drilled on BLM lands, there will be a proportionate decrease in the number of wells drilled on school trust lands. It can be assumed that a significant number of wells may not be drilled on SITLA lands if Alternatives B or E is adopted. All bonus, rental, and royalty revenues from these wells, at SITLA's royalty rate of 12.% would be captured by the RMP decision to adopt Alternative B or E. This could amount to millions of dollars lost to the schools of the state of Utah. The State Board of Education cannot be supportive of any taking of school trust assets.	The potential SITLA revenues lost to Alternative E has been added to the FEIS. See section 4.1.1.2.5.9. As stated in the EIS, impacts resulting from Alternative B would be similar to A given that the acres open for oil and gas development is greater under B than A by 0.3% and the total well potential differs by only 7 wells over the next 15 years.	Yes
Maryland Ornithological Society, Inc	38	3	Alternative C does not adequately reflect the economic values of nature-oriented tourism on the Monticello planning area. The tourism sector is already and important economic contributor in San Juan County, and it will become more so	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	No

SOC – Socioeconomics					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			in the decades ahead if the lands are not degraded by the impacts of ORVs and oil and gas development. We believe that watchable wildlife, heritage tourism, and the economic benefits of tourism-related infrastructure development will prove to be more valuable and more sustainable than the promotion of ORVs and mineral leasing under Alternative C at the expense of wildlife habitat and wilderness values.	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. The BLM believes that Alternative C, the preferred alternative, represents as a balance of land uses and therefore fulfills the FLPMA mandate.	
IPAMS(Independent Petroleum Assc of Mountain States)	55	5	The analysis that only seven employees would be required to drill and complete a well leaves out all the other employment generated by oil and gas activity. As the BEBR study states, "Many other industries benefit from spending by the oil and gas industry. These include consulting geologists and engineering companies, environmental consultants, vendors of oil field equipment and pipeline and trucking companies. Spending by oil industry employees also benefits the local economy. These economic benefits beyond direct employment in the exploration and production industry are known as indirect and induced benefits, and are the source of the "multiplier" effect." The analysis in the DRMP/EIS should include this total economic impact on the producing areas.	In Section 4.1.1.2.5.3 the BLM acknowledges that indirect industry-related employment could involve up to 25 additional employees. In larger oil and gas related economies, the multiplier effect of indirect and induced employment opportunities would have a substantial impact on local communities. In San Juan County, oil and gas related employment is so low (5.6% of total employment in 2000) that even the indirect effects would be negligible.	No
EOG Resources	60	5	On page ES-8, the BLM asserts that Alternative B has the "potential for short-term adverse impacts to local economics	The sentence on page ES-8 has been rephrased to state: “Alternative B would have potential for adverse impacts to	Yes

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			and business that depend on public land for resource extraction." Elsewhere in the Monticello DRMP/EIS, the BLM defines "short-term impacts" as impacts that "result in changes to the environment that are stabilized or mitigated rapidly." Monticello DRPM/EIS, pg 4-6. In the analysis of the impacts of the alternatives in Chapter 4 of the Monticello DRMP/EIS, the BLM provides no justification to support its assertion that the economic impacts of Alternative B will be "short term."	businesses that depend on public lands for resource extraction."	
EOG Resources	60	37	On page 2-112, the BLM does not clearly explain the severe socioeconomic impacts of the various alternatives on the resource Minerals and Energy Resources. See Monticello DRMP/EIS, pg 2-112, Table 2.2. Under Alternative A, the BLM estimates the annual revenue from 5 natural gas wells. The BLM then states that the socioeconomic impacts from Alternative B will be the same as Alternative A "except total well potential would differ by only 7 wells." The BLM makes similar comparisons for the three other alternatives. These comparisons are not useful. The BLM attempts to compare annual revenue from the number new wells projected to be drilled each year under Alternative A with the number of total wells projected to be drilled over the life of the Monticello RMP under Alternatives B through E. This comparison does not allow the public to assess the long-term socioeconomic impacts of the various development alternatives. The BLM should calculate the projected revenue over the anticipated life of the Monticello RMP from oil and gas development for each alternative and compare these projected revenues. The BLM should revise the summary of socioeconomic impacts from minerals and energy resources presented in Table 2.2 to provide the public with meaningful comparisons of the development alternatives.	Please refer to response to comment 60-52.	No
EOG Resources	60	38	Monticello DRMP/EIS, pg 2-113, Table 2.2, This statement is completely unsubstantiated and misleading. The	The statement on page 2-113 has been revised to reflect the statement of 4-345.	Yes

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			statement suggests that managing lands for wilderness characteristics under Alternative E may yield positive economic impacts that outweigh the negative economic impacts that will result from closing these lands to other resource uses such as oil and gas development. The analysis set forth in Chapter 4 of the Monticello DRMP/EIS does not support the conclusion that Alternative will yield positive economic benefits. The BLM provides absolutely no evidence to support its speculation that closing non-WSA lands to development will generate revenue for the local economy or, moreover, that any positive effects would offset the revenue lost by closing the area to oil and gas development. In Chapter 4, the BLM admits that it cannot quantify any potential economic impacts from managing additional lands for wilderness characteristics. See Monticello DRMP./EIS, pg. 4-345 ("It is difficult to predict whether the potential socioeconomic gains described above will outweigh the socioeconomic losses which could result from" managing non-WSA lands for wilderness characteristics.). Without such quantification, it is impossible for the BLM to suggest that closing lands for wilderness character may created positive economic impacts that will outweigh lost revenue from other resource uses such as oil and gas development. The BLM must revise its statement on page 2-113 to clearly state that the management prescriptions in Alternative E will result in lost revenue from oil and gas development and other resource uses, and that the BLM cannot determine whether managing lands as wilderness will ultimately yield economic benefits that will outweigh this lost revenue.		
EOG Resources	60	51	The BLM understates the impacts of the ROW exclusion designation under Alternative E. The BLM asserts that designating 582.357 acres of non-WSA lands with wilderness characteristics as ROW exclusion areas as proposed under Alternative E "could potentially have a minor	Impacts to ROW exclusions are not expected to be major for the proposed plan based on the fact that the RFD for the overall planning area for oil and gas development is quite low (74 wells over the next 15 years). Alternative E could have increased adverse effects compared to the proposed plan,	Yes

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			adverse impact on socioeconomics." See Monticello DRMP/EIS, pg. 4-336. The BLM provides no justification for its proposition that impacts would be "minor". By designating large areas of the resource area as ROW exclusion areas, the BLM makes oil and gas development more difficult and more expensive. The BLM must provide some justification for its assertion that designating these areas as ROW exclusion areas would result in "minor" impacts.	although not expected to be major given the low potential of mineral occurrence in the area. The proposed plan, as opposed to Alternative E manages far fewer acres as ROW exclusion than Alternative E. Further, existing leases will be granted ROW regardless of alternative selected. The PRMP/FEIS has been revised to further explain existing leases and RFD potential.	
EOG Resources	60	52	The BLM estimates revenue from five oil and five natural gas wells for Alternatives A - D and three oil and three natural gas wells for Alternative E. See Monticello DRMP/EIS, pg 4-343, Table 4.91. The information does not accurately project annual royalty revenue under each alternative. The BLM does not explain why it chose to estimate annual revenue from five oil and five natural gas wells when it estimates that a combined total of eight oil and natural gas wells would be drilled per year under Alternatives A, C, and D, and a total of seven oil and natural gas wells would be drilled per year under Alternatives B and E. See 4-100 (Table 4.42), 4-111 (Table 4.47), 4-120 (Table 4.51), 4-129 (Table 4.59). The BLM should revise Table 4.91 to provide a more accurate estimate of the royalties that are projected to be generated annually under each alternative.	There appears to be confusion concerning the Reasonably Foreseeable Development (RFD) scenario for oil and gas development in the Monticello planning area with other places in the West such as Pinedale, Wyoming or Vernal, Utah, both of which have seen major positive and negative impacts from minerals development. As described in Chapter 4, the BLM does not expect to see significant oil and gas development in the Monticello planning area over the next 15 years, and therefore does not expect major socioeconomic benefits or costs from these activities. The BLM's analysis is based on the RFD; evidence that the RFD is incorrect or based on improper assumptions should be brought to BLM's attention prior to completion of the planning process. Section 4.1.1.2.5.3 explains why a 5 wells annually was used in Alternatives A -D and 3 wells annually under Alternative E. See Table 4.90 for total annual well potential. The estimated royalty revenue is based on the 5 and 3 wells annually.	No
CrownQuest	62	9	In the analysis of the impacts of the alternatives in Chapter 4 of the Monticello DRMP/EIS, the BLM provides no justification to support its assertion that the economic impacts on Alternative B will be "short term". On page 4-6, the BLM also states the impacts of Alternative E will be similar to Alternative B, but more restrictive. Alternatives B and E propose to close significant areas within the Monticello	Please refer to response to comments 55-5, 60-52 and 62-64.	No

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			RA to oil and gas development, and to restrict oil and gas development in areas open to leasing. The management prescriptions proposed for Alternatives B and E will detrimentally impact the economy of San Juan County over the life of the Monticello RMP by reducing revenues to the county and by eliminating a source of employment in the community.		
CrownQuest	62	26	The BLM must recognize, study, and report the economic impact its decision to close significant portions of the planning area to leasing, or to make significant portions only available with major constraints, will have upon future exploration and development in the area. It is not enough for the BLM to simply assert that existing lease rights will be protected. Rather, the BLM must analyze how existing lease rights will be impacted by future limitations on leasing and development and identify the protections it will afford to existing leases.	Please refer to response to comments 55-5, 60-52 and 62-64.	No
CrownQuest	62	40	The BLM's sensitive species management will adversely impact oil and gas development in the Monticello RA and thereby will adversely impact the socioeconomic conditions in the region.	The DRMP/DEIS, page 4-115 acknowledges that wildlife management decisions can adversely impact minerals development. Under its multiple use, sustained yield mandate, the BLM is required to consider resource conflicts, including sensitive species issues, in developing oil and gas leasing categories and restrictions. Such restrictions, as acknowledged in the DEIS/DRMP can increase the costs of exploration and development, but generally do not preclude such activities. See also responses to comments 55-5, 60-18, 60-52 and 62-64.	No
CrownQuest	62	64	On page 2-112, the BLM does not clearly explain the severe socioeconomic impacts of the various alternatives on the resource Minerals and Energy Resources. The BLM attempts to compare annual revenue from the number of new wells projected to be drilled each year under Alternative A with the number of total wells projected to be drilled over the life of the Monticello RMP under Alternatives B through	Please refer to response to comment 60-52. Due to the small number of wells predicted within the Monticello PA over the life of the plan, economic impacts are not anticipated to be "severe," regardless of the alternative selected.	No

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			E. This comparison does not allow the public to assess the long-term socioeconomic impacts of the various development alternatives.		
CrownQuest	62	72	In Section 3.13.4.2.2, the BLM acknowledges that San Juan has the highest unemployment in the state at 11% and that unemployment in consistently double or triple the state average. See Monticello DRMP/EIS, pg 3-102. Similarly, in section 3.13.4.2.3 the BLM acknowledges that per capita personal income in San Juan County has been consistently lower than the state average and was the lowest in the state of Utah in 2003. See Monticello DRMP/EIS, pg 3-104. Despite these recognitions, many of the prescriptions in the Monticello DRMP/EIS would limit economic activity by restricting access to oil and gas development. The Monticello DRMP/EIS does not properly assess the effects restrictive land management decisions will have on the local economy, and the opportunities denied by severely restricting access to energy resources through a whole range of overlapping restrictions including wilderness-like designation of land, NSO, CSU, VRM, timing limitations, and others.	It is not the BLM's role to create (or decrease) employment opportunities in any one sector of the economy. The role of the DEIS is to assess the impacts of planning decisions have on various affected sectors, if any. The BLM summarizes the minor costs and benefits associated with oil and gas development on local communities in Chapter 4, p. 260-264. The commenter's reference to the impacts such activities have had in other parts of the West is unlikely to apply to the Monticello planning area. The Reasonably Foreseeable Development (RFD) scenario for oil and gas projects that relatively few wells would be drilled, would employ relatively few people, and would produce negligible adverse social impacts. The commenter seems to be confusing the MPA with the large-scale development that has occurred in certain areas. The BLM's analysis is based on the RFD; the commenter has provided no evidence that the RFD is incorrect. Data show that less than three per cent of the San Juan County's economy is dependent on oil and gas activities. This corresponds closely to BLM's analysis in Chapter 4.	Yes
CrownQuest	62	86	On page 4-343, the BLM states that 50% of royalty revenue from oil and gas development will go to the State of Utah. The 2008 federal budget included a provision that directed an additional 2% of royalty revenues away from the states, leaving them with 48%, not 50%, of royalty revenues during fiscal year 2008. Consolidated Appropriations Act, 2008, Pub. L. 110-161 (2008).	Similar to other data in the DEIS/RMP, the royalty revenue distribution is for comparative purposes only. Due to the amount of time it takes to compile and RMP the document will never have the most current data available. Further, a 2% decrease in state royalty revenues would not affect plan decisions or the analysis of alternative impacts.	No
CrownQuest	62	87	The BLM does not explain why it chose to estimate annual revenue from five oil and five natural gas wells when it	Based on the RFD, the well potential per alternative varies slightly between Alternatives A - D (with 4-5 wells annually)	No

SOC – Socioeconomics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			estimates that a combined total of eight oil and natural gas wells would be drilled per year under Alternatives A, C, and D, and a totally of seven oil and natural gas wells would be drilled per year under Alternatives B and E. See Monticello DRMP/EIS, pgs. 4-100 Table (4.42), 4-111 (Table 4.47), 4-120 (table 4.51), 4-129 (Table 4.55), 4-137 (Table 4.59).	and Alternative E projects 3 wells annually. An explanation of well potential and anticipated royalties can be found in Section 4.13.12.2.5.3 (Tables 4.90 and 4.91).	
CrownQuest	62	88	The information in Table 4.91 is also inadequate because it does not quantify expected royalties during the life of the Monticello RMP for all of the five alternatives. The projected number of oil and gas wells to be drilled over the life of the plan varies by a range of 20 wells. See Monticello DRMP/EIS, page 4-100 Table (4.42), 4-111 (Table 4.47), 4-120 (Table 4.51), 4-129 (Table 4.55), 4-137 (Table 4.59).	The exact expected number of wells drilled per year (oil and gas) on BLM lands is projected as follows: Alternative A = 4.86 wells; Alternative B = 4.4 wells; Alternative C = 4.93 wells; Alternative D = 5.0 wells; Alternative E = 3.6 wells; Proposed Plan = 4.8 wells. (The 20 wells that the commenter refers to may include wells on all lands in the planning area, not just those wells that are on BLM lands.) For the calculation of oil and/or gas royalties, the number 5 was used as the nearest whole number for the number of wells drilled per year in Alternatives A, B, C, D and the Proposed Plan. Should the commenter wish to use the fractional numbers to figure out the exact projected royalties, he or she may do so by multiplying the yearly royalty (estimated at $50,245 for oil and $62,470 for gas by the fractional well estimate. For example, the oil royalty in Alternative A would be estimated at $244,197, for B it would be $221,078, for C it would be $247,707, for D it would be $251,225 and for the Proposed Plan, the oil royalties for 4.8 wells would be $241,176. However, since a fraction of a well does not exist, and since there are already many assumptions built into the analysis, the whole number 5 was used to compare the royalty payments. The use of this whole number results in Alternative A, B, C, D and the Proposed Plan producing the exact same royalty payments per year on BLM lands.	No

SOL – Soils					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Southern Utah Wilderness Alliance	26	13	Existing conditions should include the impact of ORVs and other uses on soils.	The impacts of OHVs and other uses on soils are discussed on pages 4-356 through 4-383 of the DEIS. Alternative A is the existing situation which has been affected by past and present uses. This alternative serves as the baseline from which the effects of other alternatives are compared.	No
Southern Utah Wilderness Alliance	26	23	Given the over 2,820 miles of ORV trails the plan proposes to designate, the potential for soil erosion is significant. Soil erosion is one of the primary impacts of ORV use.	Chapter 4 presents the impact analysis of route designation. See pages 4-528-370.	No
ECOS Consulting	58	1	Throughout this Monticello DRMP/EIS, there are statements implying that trampling and other surface disturbances would have only direct and short-term adverse impacts. BLM provides no supporting date for this position, and based on the available scientific literature, and my research and experience, this is simply not true. This view denigrates the serious long-term adverse impacts of the destruction of biological soil crusts. Any trampling of biological soil crusts (BSC's), which cover over 90% of exposed soil in the Monticello Planning Area, will have serious short - and long - term negative impacts (including direct, indirect and cumulative) because of the increased soil erosion potential, the importance of moisture retention, the importance to maintaining native vegetation communities, and the slow natural restoration rates of these soil and vegetation types in this dry environment. Future climate changes could act to further exacerbate these significant consequences.	On pg. 4-357 of the DRMP/EIS the BLM recognizes the importance of biological soil crusts. On this page it states that these crusts help to stabilize soils, reducing erosion, and increasing soil productivity. It is further noted that these soils have not been mapped and are therefore only discussed qualitatively. The references cited above are examples of the analysis of impacts to biological crusts in Chapter 4. There are no laws, regulations, or policies requiring the protection of biological soil crusts.	No
ECOS Consulting	58	25	4.3.13.3.2.3 Alternative C Page 4-365, 2nd Paragraph: There is no mention in this section of the widespread historic	On pg. 4-357 of the DRMP/EIS the BLM recognizes the importance of biological soil crusts. On this page it states that these crusts help to stabilize soils, reducing erosion, and increasing soil productivity. It is further noted that these soils have not been mapped and are therefore only discussed qualitatively.	No

SOL – Soils					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			impacts of grazing on soils and water resources, nor of the present conditions of the allotments, most of which are in poor to extremely poor condition. Where is the analysis of direct, indirect, and cumulative impacts of livestock grazing on soils and water resources that are required by NEPA to be included in this DRMP/EIS? It is evident in the field that the destruction of biological soil crusts is widespread and major, and this degraded condition has and will affect water quality. What are these impacts and what are the trends? This information must be presented in the DRMP/EIS, so that the public and decision makers can assess the impacts of a use that is proposed in this DRMP/EIS to continue on over 90% of the Monticello Planning Area for the next 10-20 years.		
CrownQuest	62	35	On pg. 2-34, the BLM proposes the following Management Common to All Alternatives: "Any proposed activities that would be located in sensitive soils (e.g., hydric, saline, gypsiferous, or highly erodible soils, Maps 34-40) would be subject to site-specific NEPA and would incorporate BMPs and other mitigation measures to minimizing soil erosion and maintain soil stability." See Monticello DRMP/EIS, pg 2-34 Table 2.1. This Management Common to All Alternatives must clarify what is meant by "sensitive soils." The parenthetical phrase following "sensitive soils" does not adequately describe what constitutes a sensitive soil. Similarly, Maps 37-40 do not refer to the types of soils listed in the parenthetical clause in this Management Common to All Alternatives. Although Map 37 depicts areas with "highly saline", "moderately saline," and "low saline" soils. Neither Map 37 nor the Management Common to All Alternatives in Table 2.1 clearly identifies which soils are subject to special management. In the final Monticello RMP/EIS, the BLM must clearly define and map any soils that are managed under specific prescriptions.	Please refer to response to comment 60-23. In addition: Sensitive soils are determined based on maps and field verification, as well as field data from research studies, rangeland health assessments, or other monitoring efforts. At this time the BLM does not have an accurate map of all the soils that would meet the criteria for sensitive soils within the planning area. NRCS maps provide broad scale planning soil information that generally must be field verified prior to implementing activities on the ground. This would be done during activity and site specific planning. The maps provided display published soil survey information depicting some of the characteristics that could lead to the determination that a project site may contain sensitive soils, in order to help plan and prioritize field verification efforts within a project planning area. A definition of sensitive soils was added to the glossary.	Yes

SOL – Soils					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
CrownQuest	62	36	Additionally, the BLM must clarify the term "site-specific NEPA." Merely instructing that an action is subject to "site-specific NEPA" does not impose any obligation beyond that already required by federal law. However, NEPA requires that the BLM prepare an EIS for any major federal actions that will significantly affect the quality of the human environment. 42 U.S.C. 4332 (2006). The phrase "site-specific NEPA" may improperly suggest that all activities in sensitive soils are major federal actions that require preparation of an EIS. The BLM must revise the phrase to clearly explain the amount of environmental analysis the BLM intended to require, if any prior to authorizing activities in sensitive soils.	Please refer to response to comment 60-23.	Yes
CrownQuest	62	37	Finally, aside from the management action that proposed activities located in sensitive soils would be subject to "site-specific NEPA and would incorporate BMPs and other mitigation measures to minimize soil erosion and maintain soil stability," the BLM does not appear to identify any other special management to protect or preserve sensitive soils. In Chapter 4 of the Monticello DRMP/EIS, however, the BLM appears to analyze the imposition of special and NSO leasing stipulations to protect sensitive soils. See Monticello DRMP/EIS, pgs. 4-113 (Table 4.48), 4-122 (Table 4.52), 4-131 (Table 4.56), 4-140 Table 4.60). The BLM must identify any specific management actions to protect sensitive soils in Table 2.1. Accordingly, the BLM must revise either Table 2.1 or the discussion of impacts in Chapter 4 to clarify which management actions it proposes to protect sensitive soils.	The leasing categories were determined based on criteria such as ACEC designations, Floodplains, or Special Status Species habitat or special timing needs for wildlife. Soil characteristics or limiting factors were not used in determining lease categories. Tables 4.43, table 4.48, 4.52, 4.56, & 4.60 simply list potential acreages of soils with limiting soil characteristics within each of the leasing categories; soil characteristics or criteria were not used to determine leasing categories. However, based on the categories, the amount of “sensitive soils” that are potentially affected in each alternative differs. Language has been added to chapter 4 to clarify this in section 4.3.7.4.6.	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
U.S. Fish and Wildlife Service	2	1	Remove bald eagle from section 2.1.1.5 page 2-5 and check entire document to remove threatened status for bald eagle throughout. Recommend including bald eagle in wildlife section and retaining Conservation Measures of Appendix Q since the species is still protected by the Migratory Bird Treaty Act and the Eagle Protection Act.	Entire document has been adjusted to correct the status from "threatened" to "special status species". Bald eagle is now listed on the BLM and Utah Sensitive Species List and is listed in that section vs. the wildlife section. Conservation Measures will be kept in Appendix Q to continue protection for bald eagles.	Yes
U.S. Fish and Wildlife Service	2	2	Table 2.1 - Special Status Species should include any conservation measures for the 58 non-federally-listed special status species.	BLM is committed to work with UDWR to implement the Utah Comprehensive Wildlife Conservation Strategy (name will be changed to Utah Wildlife Action Plan) on page 2.51 under Management Common to All Alternatives. This plan identifies threats to species and conservation measures needed to preserve special status species and other wildlife.	No
U.S. Fish and Wildlife Service	2	3	The conservation measures listed in Table 2.1 appear to be paraphrased items from Appendix Q. To avoid confusion, either replicates Appendix Q measures into this table, or at a minimum reference Appendix Q here.	The Conservation Measures listed in Table 2.1 – Special Status Species for bald eagle, Mexican spotted owl, southwestern willow flycatcher and yellow-billed cuckoo, Colorado River fishes, and California condor has been removed from this table and will make reference to Appendix Q to avoid confusion.	Yes
U.S. Fish and Wildlife Service	2	4	Alternative C reduces the buffer around Gunnison Sage-grouse leks to 0.6 miles. FWS recommends CSU for oil and gas leasing activities within 2.0 miles of leks and that construction of permanent facilities be avoided within a 2.0 miles buffer around leks, unless it can be shown to not affect sage-grouse.	Changes have been made to reflect BLM's suggested guidelines and those found in the Gunnison Sage-grouse Rangewide Plan. The year-round habitat is CSU which would avoid permanent structures. Other suggested management practices will be implemented and came directly from the Gunnison Sage-grouse Rangewide Conservation Plan, which BLM has committed to implement.	Yes
U.S. Fish and Wildlife Service	2	5	Before developing guzzlers and springs, threats associated with the possible spread of West Nile Virus should be considered since grouse are susceptible to the disease.	Comment noted. Site specific analysis would be conducted on future guzzlers and springs where effects would be analyzed, including the spread of West Nile Virus.	No

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
U.S. Fish and Wildlife Service	2	12	The term "special status species" is not used consistently throughout the document and it is unclear whether the designation only applies to federally listed and candidate species. See Table 2.2 page 2-123.	The term "special status species" includes federally listed, candidate species, and state listed species. Some of these species have designated associated habitat with special conditions as listed in Chapter 2. These are the acreages discussed in Table 2.2. With the large scope of this document, it is difficult to discuss the habitat of all species since there are not designations for each animal. These will be analyzed on a site specific basis.	No
U.S. Fish and Wildlife Service	2	16	Page 3-140 under section 3.16. The third line limits additional sensitive species to plants; however, the second paragraph more accurately includes the numerous species of animals also identified as sensitive.	The sentence has been changed to read "..... Under the Endangered Species Act, as well as those plant AND ANIMAL species listed or proposed as sensitive by the BLM."	Yes
U.S. Fish and Wildlife Service	2	17	Page 3-143 in section 3.16.2. In Utah, Mexican spotted owl habitat does not include high canopy closure, high stand density and multi-layered canopies of uneven-aged stands.	These habitat descriptions have been removed from this section.	Yes
U.S. Fish and Wildlife Service	2	21	Page 4-419 in Table 4.106. The entire state of Utah is not within the nonessential, experimental boundary of the condor. A small portion of San Juan County is outside of the nonessential, experimental boundary. Update the RMP for accuracy.	The Table 4.106 has been changed to show that the entire state of Utah is not within the nonessential, experimental boundary of the California Condor.	Yes
U.S. Fish and Wildlife Service	2	22	Page 4-421 in section 4.3.15.1. The first paragraph states that "Many of these species, however, would be indirectly protected by the restrictions and buffers in places for [the special status species]." This statement seems like an over-generalization, and assumes that all special status species have the same habitat requirements as the federally-listed species.	The use of the term "Many of the species" does not assume that All special status species have the same habitat requirements as federally-listed species. Direct of indirect impacts would be discussed during site specific analysis where specific habitat information is available.	No
U.S. Fish and Wildlife Service	2	27	Page 4-424 in section 4.3.15.1. In the first paragraph, recovery plans for all species should be referenced here, not just the Southwestern willow flycatcher plan.	Other recovery plans have been added and referenced.	Yes
U.S. Fish and Wildlife	2	30	Page 4-438 in section 4.3.15.2.6.1. Rocky Slopes and Canyons: The statement, "Direct, adverse impacts include	The statement has been added into the riparian habitat. The same impacts are discussed in the Desert Shrub, Sagebrush,	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Service			short-term disturbance of .... Special status species resulting from construction and operation noise, and a long-term reduction in habitat from the installation of mineral development infrastructure" should be applied to all habitats and alternatives, not just the rocky slopes and canyons habitat.	Perennial Grassland, Pinyon-Juniper Woodland, and Conifer/Mountain Shrub habitats on Page 4-437 although it is not worded exactly the same.	
U.S. Fish and Wildlife Service	2	31	Page 4-441 in section 4.3.15.2.6.3. The decision that "No Gunnison Sage-grouse habitat would be closed or NSO to mineral entry" does not adequately protect this species. Need to Provide additional protection of leks by limiting surface occupancy for minerals and other ground disturbing activities would help preserve sage-grouse.	Changes have been made to the document and the lek habitat will be protected from all surface disturbing activities by being closed and classified as NSO.	Yes
U.S. Fish and Wildlife Service	2	32	Page 4-456 in section 4.3.15.2.12.2. Alternatives B and E would result in fewer adverse impacts on Gunnison Sage-grouse and other sagebrush special status species than the preferred alternative. We recommend these be applied to sage-grouse.	Adjustments have been made to the alternatives for Gunnison Sage-grouse to ensure they are protected according to the Gunnison Sage-grouse Rangewide Conservation Plan.	Yes
State of Utah	4	10	The BLM should only employ the term “critical habitat” when referring to the legal habitat designations for endangered and threatened species under the ESA.	The term critical has been reserved to Threatened and Endangered (T &E) species. Corrections in the text have been made in the PRMP/FEIS. For non-T&E species the BLM relied on the UDWR crucial habitat designations.	Yes
State of Utah	4	90	UDWR intends to investigate the status of the Spotted ground squirrel, Stephens’ woodrat and the Silky pocket mouse and would welcome mention of cooperation from the BLM in the RMP.	These species are included in the Utah Wildlife Action Plan. Please refer to response to comment 004-89.	No
State of Utah	4	91	Devils Canyon appears to be a unique habitat for the Acorn woodpecker and deserves special consideration.	Although there is not specific mention of Devils Canyon and the Acorn woodpecker, this area and species would be considered on a site-specific basis. Please refer to response to comment 004-89.	No
Southern Utah Wilderness Alliance	26	119	DRMP does not account for Special Status Species reliance on other species and habitat necessary to survive.	Please refer to response to comment 26-118.	No

SSS – Special Status Species					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Grand Canyon Trust	33	3	Under Table 2.1 Summary Table of Alternative Gunnison Sage Grouse (page 2-53) we recommend protection of lek habitat within 2 miles of active strutting grounds and year-round habitat protection within 6 miles of active strutting grounds (Alternatives "B" and "E"). This recommendation is based on USFWS assertion that a 5 mile buffer around lek sites is necessary. The USFWS based their recommendation for sage-grouse on Connelly et al. (2000) "Specifically, for non-migratory populations occupying habitats that are uniformly distributed, protect sagebrush and herbaceous understory within 2 miles of all occupied leks. For non-migratory populations, leks should be considered the center of year round activity and treated as focal points for management activities. For non-migratory populations where sagebrush is not uniformly distributed, suitable habitats should all be protected out to 3.1 miles from all occupied leks. For migratory populations of sage-grouse, breeding habitats within 11.2 miles of active leks should be protected recognizing that birds may move more than 11.2 miles from leks to nest sites."	Changes have been made to Table 2.1 for Gunnison Sage-grouse. These changes reflect the recommended protection measures found in the Gunnison Sage-grouse Rangewide Conservation Plan which was developed with the collaboration of several agencies including the Utah BLM and U.S. Fish and Wildlife Service.	Yes
Public Lands Advocacy	35	8	On page 2-51, Table 2-51, the DEIS identifies several restrictions designed to protect the bald eagle as listed under the Endangered Species Act (ESA). The bald eagle was removed by the USFWS from the T&E list last July. Further, it is not listed as a sensitive species by the Utah BLM State Office. In fact, the USFWS has already proposed new regulations that authorize a "take" of the bald eagle in accordance with the criteria listed in the Bald and Golden Eagle Protection Act. Therefore, the FEIS must recognize that protection of the bald eagle is subject only to that described in the Bald and Golden Eagle Protection Act of 1940 and remove the restrictions identified in the DEIS.	Entire document has been adjusted to correct the status from “threatened” to “special status species”. Bald eagle is now listed on the BLM and Utah Sensitive Species List and has been listed in that section vs. the wildlife section. Conservation Measures have been kept in Appendix Q to continue protection for bald eagles.	Yes

SSS – Special Status Species					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Public Lands Advocacy	35	9	Table 2-1 at Page 2-53 indicates that sage grouse lek habitat will be protected within 0.6 miles of an active strutting ground and that new oil and gas leases will be subject to a controlled surface use (CSU) stipulation under Alternative C. Under Alternative B the protection zone would be 2 miles, while under Alternative D it would be .25 of a mile. Additionally, BLM has identified a 6-mile year-round habitat buffer in which oil and gas operators would be required to utilize Suggested Management Practices listed in the Gunnison Sage-Grouse Range-wide Conservation Plan. BLM indicates that these restrictions are based upon best available scientific information, i.e., National Sage-grouse Habitat Conservation Strategy: Strategic Management Plan for Sage-grouse (BLM 2004d), WAFWA Conservation Assessment of Greater Sage-grouse and Sagebrush Habitats (Connelly et al. 2004), and the Gunnison Sage-grouse Range-wide Conservation Plan (2005, as revised). In reviewing the DEIS, we can find no description of the documents referenced nor any analysis or justification regarding the need for any buffer zones around strutting grounds in the MFO. Nor can we find any maps that illustrate where restrictions would be imposed, making it impossible to discern the impacts to future oil and gas development. Maps 66 through 68 fail to identify the specific of sage grouse species depicted and they fail to outline what BLM considers "crucial year-round habitat, as discussed on page 2-53.	Changes have been made to the proposed plan that make the protection measure more consistent with the Gunnison Sage-grouse Rangewide Conservation Plan as listed in Table 2.1. Changes have also been made to the maps to clearly show where the proposed stipulations would be. Lek sites are not specifically mapped since they do change from year to year and those will be analyzed on a site-specific basis.	Yes
Public Lands Advocacy	35	10	In our experience in reviewing RMP DEIS, most BLM office's that manage sage grouse habitat have limited the buffer to .25 mile around active leks. The proposals in Preferred Alternative C and Alternative B are excessive and have no supporting scientific foundation. We do not support the unsubstantiated 6-mile year-round radius around Sage grouse leks because it has no scientific basis.	Changes have been made to the proposed plan to protect the Gunnison Sage-grouse as suggested in the Gunnison Sage-grouse Rangewide Conservation Plan. This plan was developed with the best available science.	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			The suggested 0.6 mile and 2 mile buffers lack empirical support.		
The Nature Conservancy	49	1	The Final RMP must give priority to maintenance of SSS over the implementation of resource uses that may have adverse impacts on those species. The strategic scope of an RMP as a guidance document makes it especially important that it contain an over-arching commitment not to cause adverse effects to an SSS - specifically, not to hinder the recovery of listed species, nor to cause the need for listing of sensitive species (per the Endangered Species Act and BLM Manual 6840).	Analysis of impact to Special Status Species is required for every site-specific, implementation level action. The intent of the RMP is to provide the guidance to give protection to Special Status Species as listed under Management Common to All Alternatives in Table 2.1 under Special Status Species. Also, please refer to the specific stipulations for oil and gas leasing and other surface disturbing activities that are imposed as a result of management for special status species.	No
The Nature Conservancy	49	2	We urge that the language in the Final RMP pertaining to the necessary commitment to the protection and sustaining of SSS be stronger. --Under 2.1.1.5 Special Status Species. (Page 2-5). The DRMP states that "Land use plan decisions should be consistent with…" various mandates, plans and agreements for T and E species. A stronger and more accurate statement to put into the Final RMP is that "Land use plan decision must be consistent with…" those mandates and agreements etc. --We suggest adding a statement pertaining to allowing and participating in research of threatened and endangered and Sensitive species and their habitats. --"The protection of species and potential and/or occupied habitat for special status species would be considered and implemented prior to any authorization or action by the BLM that could alter or disturb such habitat." While it is fine to	Chapter 2 shows the summary of proposed actions. Terms such as "should and would" are appropriate in this chapter since the decision has not been made yet. It is simply proposed. Please refer to Page 2-51 in Table 2.1 under Management Common To All Alternatives, "Inventories and monitoring studies would be conducted in order to determine special status plant and animal species locations, potential habitat, population dynamics, and existing and potential threats. BLM has added another sentence to this that states, 'Monitoring protocols established by U.S. Fish and Wildlife and Utah Division of Wildlife Resources would be used." Wording is changed on Page 2-51 to state, "No management action would be permitted on BLM lands that would jeopardize the continued existence of species that are listed, proposed for listing, or candidates for listing under the Endangered Species Act and BLM State Director's sensitive plant and animal species as required by the BLM Manual	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			consider such SSS habitat protection, the BLM needs to give primacy to the conservation of SSS in such cases -- not necessarily a wholesale halting or precluding of other valid uses of public lands, but fine-scale design of such uses so as to be compatible with the priority of maintaining SSS habitats/occurrences. (Page 2-52-2-52). --A second point states that "No management action would be permitted on BLM lands that would jeopardize the continued existence of species that are listed, proposed for listing, or candidates for listing under the Endangered Species Act." Give that BLM Manual 6840.06E and the DRMP (Page 3-140) provide Sensitive species with (at least) the same level of protections Candidate species, then we would clarify this statement in the Final RMP to be applicable to BLM Sensitive species as well. (Page 2-51-2-52). --A following point states that "Inventories and monitoring studies would be conducted in order to determine special status species locations, potential habitat, population dynamics, and existing and potential threats." However, the DRMP does not specify the use of the appropriate protocols for such inventories and monitoring. A statement should be added indicating that the BLM will use protocols established for individual species. (Page 2-51-2-52). --A following point states that "BLM would support and implement the guidelines and management recommendations presented in species recovery or conservation plans (as updated), or alternative management strategies developed in consultation with USFWS." A stronger and more accurate statement in the Final RMP would be "the BLM will support, follow and implement current	6840."	

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			and future special status plant and animal species Recovery Plans, Conservation Plans, Strategies, and Agreements…" (Page 2-51-2-52).		
The Nature Conservancy	49	3	The final RMP must be explicit about giving priority to maintenance of SSS over the implementation of resource uses that may have adverse impacts on those species.	Analysis of impacts to Special Status Species is required for every site-specific, implementation level action. The intent of the RMP is to provide the guidance to give protection to Special Status Species.	No
The Nature Conservancy	49	18	Under Table 2.1 Summary Table of Alternatives Gunnison Sage-grouse (Page 2-53) the Conservancy recommends that Alternative B -- protection of lek habitat within 2 miles of active strutting grounds and year-round habitat protection within 6 miles of active strutting grounds -- be carried forward into the Final RMP. This recommendation is based upon a briefing paper dated July 30, 2004 by the U.S. Fish and Wildlife Service (USFWS) that recommends a 5-mile buffer around lek sites.	The commenter's preference for Alternative B is noted.	No
ECOS Consulting	58	14	Nowhere in this document can there be found any provisions for protecting, enhancing, or restoring crucial floodplain habitat. The following Threatened and Endangered 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, but they have been hydraulically cut off because of low flows due to dams, water use upstream, and poor riparian and floodplain conditions.	On pg. 2-32 of the DRMP/EIS it states that for all alternatives no surface disturbing activities would be allowed within the 100 year floodplain of the Colorado River, Green River, and at the confluence of the Dolores and Colorado Rivers. Any exceptions to this requirement would require consultation with the U.S. Fish and Wildlife Service. Restrictions on surface disturbance within this critical habitat would be developed through this consultation process. On pg. 2-51 of the DRMP/EIS it states that the BLM would follow current and future recovery plans and manage habitat for Threatened and Endangered and BLM sensitive species. This would include the Colorado Squawfish recovery plan, the Colorado Pikeminnow recovery goals: amendment and supplement to the Colorado Squawfish recovery plan, the Humpback recovery plan, the Humpback Chub recovery goals: amendment and supplement to the Humpback	No

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				recovery plan, the Bonytail recovery plan, the Bonytail recovery goals amendment and supplement to the Bonytail recovery plan, Razorback Sucker recovery plan, Razorback Sucker recovery goals: amendment and supplement to Razorback recovery plan.	
EOG Resources	60	25	On pages 2-51 and 2-52, as Management Common to All Alternatives, the BLM identifies numerous avoidance and minimization measures for the Mexican spotted owl, southwestern willow flycatcher and yellow-billed cuckoos, endangered Colorado River fishes, and California Condor. The BLM does not explain why these avoidance and minimization measures are necessary to protect the species. Because these species are threatened or endangered, the Endangered Species Act requires the BLM to consult with United States Fish and Wildlife Service (USFWD to prior to authorizing activities that ma affect the species or critical habitat. See 16 U.S.C. 1536(a) (2006); 50 C.F.R. 402.14 (2007). Through such consultation, the BLM, together with the USFWS, can craft avoidance and minimization measures that are tailored to meet the needs of the species based on the nature of the proposed activity.	The avoidance and minimization measures were developed in coordination with the U.S. Fish and Wildlife Service to prevent and/or minimize impacts to threatened or endangered species. Please refer to Appendix A. Stipulations Applicable to Oil and Gas Leasing and Other Surface Disturbing Activities for further explanation of the stipulations.	No
EOG Resources	60	26	Because the bald eagle is no longer protected by the Endangered Species Act, the Act does not require the BLM to consult with the USFWS prior to authorizing activities that may affect the bald eagle or its habitat. The BLM accordingly must revise these management actions. In light of the bald eagle's changed status, the BLM must not impose the restrictive management measures identified on page 2-51.	Entire document has been adjusted to correct the status from “threatened” to “special status species”. Bald eagle is now listed on the BLM and Utah Sensitive Species List and has been listed in that section vs. the wildlife section. Conservation Measures have been kept in Appendix Q to continue protection for bald eagles.	Yes
EOG Resources	60	27	Although Maps 66-68 purport to identify "sage-grouse habitat", these maps are unclear and unhelpful. First, the maps do not specify which species of sage-grouse they identify--Gunnison sage-grouse or greater sage-grouse. Second, the maps do not define what the BLM considers	As discussed in Chapter 3, there are only Gunnison Sage-grouse within the Monticello Field Office planning area. BLM has revised the sage-grouse maps to define the entire	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			"sage-grouse habitat," which could include active strutting ground, "crucial year-round habitat" as defined on page 2-53. The BLM must revise Maps 66-68 to clearly describe the sage-grouse habitat that is mapped.	sage-grouse habitat, not just the BLM parcels within the habitat.	
EOG Resources	60	28	Under all of the action alternatives, the BLM proposed to prohibit or avoid the construction of "power lines and other tall structures" within various distances of sage-grouse habitat or strutting grounds. See Monticello DRMP/EIS, pg 2-53. EOG objects to this proposed management action, for several reasons. First, the BLM must clarify what "tall structures" it intends to prohibit by providing, for example, a height limit defining what it perceives as "tall". Without such clarification, this management action does not clearly identify for both land managers and users of the public lands what structures are prohibited.	Definition of what tall structures are has been added to the document that says, "Prohibit construction of power lines or other tall structures (structures above 10 feet, such as windmills or buildings) year-round.	Yes
EOG Resources	60	29	Under Alternative B and E, the BLM would prohibit construction of roads within 2 miles of active strutting ground. See Monticello DRMP/EIS, pg 2-53. This management prescription is overly broad and entirely unnecessary. The BLM, together with the USFWS, the Utah Division of Wildlife Resources, and other state and federal agencies, developed a Rangewide Conservation Plan for the Gunnison sage-grouse in 2005. See Gunnison Sage-grouse Rangewide Steering Committee, Gunnison Sage-grouse Rangewide Conservations Plan (2005). The plan presented "the best available science for assessing target population goals and genetic diversity, as well as an assessment of possible tools to help reach these goals. See Gunnison Sage-grouse Rangewide Steering Committee, Gunnison Sage-grouse Rangewide Conservation Plan, pg 5, (2005). This conservation plan recommended that roads should not be constructed within 0.60 miles of an active lek--a substantially shorter distance than the 2-mile prohibition under Alternatives B and E. See Gunnison Sage-grouse	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 of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full conservation was given to all potential alternatives identified. Alternative B and E are generally more conservation based. To fully consider a range of alternatives, BLM considered protecting more habitat than what was suggested in the Rangewide Conservation Plan.	No

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Rangewide Steering Committee, Gunnison Sage-grouse Rangewide Conservation Plan, pg 223, 279, Appx. I, pg I-4 (2005).		
EOG Resources	60	30	Under all of the action alternatives, the BLM would prohibit or avoid the construction of new fences within specified distances of active strutting grounds. See Monticello DRMP/EIS, pg 2-53. The BLM must not prohibit all fences near active strutting grounds. Rather, the BLM should exempt fences around disposal pits associated with oil and gas operations. The Utah Division of Oil, Gas, and Mining requires operators to fence disposal pits to protect wildlife and livestock. See Utah Admin. Code Rule 649-9-3 (2008). The BLM must revise this management action to allow fences around disposal pits or, at a minimum, to provide the BLM with discretion to waive a prohibition against fences where required to protect wildlife and livestock.	Wording has been changed to clarify to uses allowed within the specified distances of active strutting grounds, including NSO for oil and gas leasing activities. Disposal pits associated with oil and gas operation would not be developed within these distances of active strutting grounds, therefore these fences would not need to be exempt.	Yes
EOG Resources	60	41	The BLM incorrectly identifies the Bald Eagle, Haliaeetus leucocephalus, as a threatened species in the Monticello DRMP/EIS. See Monticello DRMP/EIS, pg 3-141. The Bald Eagle was removed from the Federal List of Endangered and Threatened Wildlife by the USFWS on July 9, 2007. See 72 Fed. Reg. 37346 (July 9, 2007). Furthermore, the bald eagle was not listed or identified as a candidate for listing on the USFWS's most recent list of candidate species. See 72 Fed. Reg. 69034 (Dec. 6, 2007). Notably, the bald eagle does not appear on the Utah BLM's list of special status species. See State-listed and BLM-listed Sensitive Species, http://www.ut.blm.gov/vernalrmpguide/state_blm_species.htm (last visited January 17, 2008). The BLM should correct the information in the Final EIS and remove the bald eagle from its discussion of threatened and endangered species.	Entire document has been adjusted to correct the status from “threatened” to “special status species”. Bald eagle is now listed on the BLM and Utah Sensitive Species List and has been listed in that section vs. the wildlife section. Conservation Measures have been kept in Appendix Q to continue protection for bald eagles.	Yes
EOG Resources	60	48	The area over which the CSU stipulations apply varies by alternative, with Alternatives B and E applying to CSU stipulation within 2 miles of active strutting ground,	The acres are identified on Page 2-53 directly under each Alternative. The map in the appendix has been adjusted to make this clearer.	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Alternative C applying to CSU stipulations within 0.6 miles of active strutting ground, and Alternative D applying in CSU stipulation within 0.25 miles of active strutting ground. The BLM, does not identify the number of acres that will be subject to the CSU stipulations under the various alternatives.		
EOG Resources	60	49	In section 4.3.7.4.8.6, the BLM fails to disclose the significant impacts of its management action to protect migratory bird habitat during nesting season on oil and gas development. See Monticello DRMP/EIS, pg. 4-95. The BLM has not explained why such restrictions are necessary. These restrictions are not required by the Migratory Bird Treaty Act of 1918, which permits disruptive activities in certain circumstances. 16 U.S.C. 703--712 (2006). The BLM must revise its proposed management action to ensure it is the least restrict necessary to protect the resource.	Although the Executive Order 13186 or the Migratory Bird Treaty Act does not state specifically what type of measures should be taken on surface disturbing activities, it is BLM's responsibility to decide how we are going to protect nesting habitat for migratory bird and by avoiding or minimizing surface disturbing activities during nesting season, the BLM is protecting migratory birds as mandated. By using the term "avoid" the BLM would consider on a case by case basis to allow a surface disturbing project if there is no reasonable alternative. At that time the activity would be done to minimize the impacts to migratory birds. BLM has added the words " or minimize" behind "avoid" to clarify this. As stated in 4.3.7.4.8.6, "This in turn would result in impacts on mineral resource development similar to those described for bald eagle." Please refer to page 4-92 for a more detailed description of the impacts to oil and gas.	Yes
EOG Resources	60	53	Although the BLM analyzes the impacts of the management actions proposed with respect to special status species on other resources, the BLM does not adequately explain or justify why the stringent management actions proposed under Alternative B and E are necessary to protect the species. See Monticello DRMP/EIS, pgs. 4-427 - 4-429. These management actions will significantly impact oil and gas operations. The BLM must explain in detail why such stringent management actions are necessary to protect the	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 of alternatives that best addressed the issues, concerns, and alternatives identified by the public.	No

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			resources and why less restrictive actions would be inadequate.	Public participation was essential in this process and full consideration was given to all potential alternatives identified.	
CrownQuest	62	39	On pages 2-51 and 2-52, as Management Common to All Alternatives, the BLM identifies numerous avoidance and minimization measures for the Mexican spotted owl, southwestern willow flycatcher and yellow-billed cuckoos, endangered Colorado River fishes, and California Condor. The BLM does not explain why these avoidance and minimization measures are necessary to protect the species. Because these species are threatened or endangered, the Endangered Species Act requires the BLM to consult with United States Fish and Wildlife Service (USFWS) to prior to authorizing activities that may affect the species or critical habitat. Through such consultation, the BLM, together with the USFWS, can craft avoidance and minimization measures that are tailored to meet the needs of the species based on the nature of the proposed activity.	The avoidance and minimization measures were developed in consultation with the USFWS. These were developed to simplify future consultations with the USFWS and inform potential permittees the measures that are needed to protect threatened and endangered species.	No
CrownQuest	62	42	Despite statements elsewhere in the Monticello DRMP/EIS, see pg 3-141, the bald eagle is not a threatened or endangered species. The bald eagle was removed from the Federal List of Endangered and Threatened Wildlife by the United States Fish and Wildlife Service (USFWS) on July 9, 2007. Furthermore, the Bald Eagle was not listed or identified as a candidate for listing on the USFWS's most recent list of candidate species. Finally, the bald eagle does not appear on the Utah BLM's list of special status species.	Entire document has been adjusted to correct the status from “threatened” to “special status species”. Bald eagle is now listed on the BLM and Utah Sensitive Species List and has been listed in that section vs. the wildlife section. Conservation Measures have been kept in Appendix Q to continue protection for bald eagles.	Yes
CrownQuest	62	43	As part of several of the bald eagle management actions listed on page 2-51, the BLM proposes consultation with the USFWS pursuant to Section 7 of the Endangered Species Act. Section 7 consultation is only required when an action may affect a threatened or endangered species. 16 U.S.C. 1536(a) (2006); 50 C.F.R. 402.14(2007). Because the bald eagle is no longer protected by the Endangered Species Act, the Act does not require the BLM to consult with the USFWS	The entire document has been adjusted to correct the status from “threatened” to “special status species”. The Bald eagle is now listed on the BLM and Utah Sensitive Species List and is listed in that section as opposed to the wildlife section. Conservation Measures will be kept in Appendix Q to continue protection for bald eagles; consultation is no longer required for bald eagles.	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			prior to authorizing activities that may affect the bald eagle or its habitat. The BLM accordingly must revise these management actions.		
CrownQuest	62	44	As the BLM is aware, the USFWS has proposed regulations to authorize take of the bald eagle under the Bald and Golden Eagle Protection Act in certain circumstances. See 72 Fed. Reg. 31141 (June 5, 2007). Once the USFWS issues final regulations, these regulations will determine how the BLM must manage to protect the bald eagle and its habitat and when consultation with the USFWS is necessary. The management provisions described on page 2-51 are not consistent with the USFWS's proposed rules.	The management provisions described on page 2-51 were developed in consultation with the USFWS and they would like to continue to manage bald eagles that same way. BLM has worked closely with USFWS throughout the entire land use plan revision process.	No
CrownQuest	62	45	The BLM's proposed management for the Gunnison sage-grouse is unduly restrictive, particularly under Alternatives B and E. The USFWS determined that the current condition of the Gunnison sage-grouse did not warrant protection under the Endangered Species Act (ESA) in April of 2006. 71 Fed. Reg. 19,954 (Apr. 18, 2006). As such, the species is not entitled to any specific protection under the Endangered Species Act.	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. The Gunnison Sage-grouse is listed as a state and BLM sensitive species and it is the responsibility of the BLM to decide how it needs to be protected to ensure any authorization does not cause the listing of an animal. The BLM has worked with the Utah Division of Wildlife Resources and the U.S. Fish and Wildlife Service to formulate prescriptions that would protect these animals so that they would not be listed as Endangered Species.	No
CrownQuest	62	46	The Monticello DRMP/EIS does not include any maps indicating the areas subject to restrictions identified on pages 2-53 and 2-54. Without maps identifying areas subject to	Maps have been added to show the Gunnison Sage-grouse management areas.	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Gunnison sage-grouse management, CrownQuest cannot determine the extent to which the BLM's proposed management actions affect CrownQuest's operations. The final Monticello RMP/EIS should include maps depicting the areas subject to Gunnison sage-grouse management restrictions.		
CrownQuest	62	47	Although Maps 66-68 purport to identify "sage-grouse habitat", these maps are unclear and unhelpful. First, the maps do not specify which species of sage-grouse they identify--Gunnison sage-grouse or greater sage-grouse. Second, the maps do not define what the BLM considers "sage-grouse habitat," which could include active strutting ground, "crucial year-round habitat", as defined on page 2-53 of the Monticello DRMP/EIS, or "year-round habitat" as defined on page 2-53. The BLM must revise Maps 66-68 to clearly describe the sage-grouse habitat that is mapped.	Maps have been added to show the Gunnison Sage-grouse habitat. The Lek sites are not specifically mapped since the number and location of the sites change from year to year.	Yes
CrownQuest	62	48	Under these management actions, the BLM would prohibit the construction of fences, roads, power lines, and "tall" structures and would limit activities during certain times of the year within designated distances from sage-grouse habitats. The BLM cannot impose conditions of approval or other limitations that are inconsistent with the lease rights granted. Once the BLM has issued a federal oil and gas lease, a lessee has not only the right to utilize the leasehold, but the obligation to develop oil and gas resources therefrom.	Prior to the purchase of a lease, the potential buyer is made aware of the stipulations associated with the lease. A lessee's surface use rights are specified at 43 CFR sec. 3101.1-2. In accordance with regulations, surface use rights are subject to: any stipulations attached to the lease; restrictions deriving from specific, nondiscretionary statutes; and, reasonable measures as may be required by the authorized officer to minimize adverse impacts to other resource values, land uses or users not addressed in the lease stipulations at the time operations are proposed. Standard lease terms provide that, at a minimum, BLM may require a lessee to relocate proposed operations up to 200 meters on the leasehold and prohibit surface disturbing operations for a period not to exceed 60 days.	No
CrownQuest	62	73	The BLM incorrectly identifies the Bald Eagle, Haliaeetus leucocephalus, as a threatened species in the Monticello	Entire document has been adjusted to correct the status from “threatened” to “special status species”. Bald eagle is now	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			DRMP/EIS. See Monticello DRMP/EIS, pg 3-141. The Bald Eagle was removed from the Federal List of Endangered and Threatened Wildlife by the USFWS on July 9, 2007. See 72 Fed. Reg. 37346 (July 9, 2007). Furthermore, the bald eagle was not listed or identified as a candidate for listing on the USFWS's most recent list of candidate species. See 72 Fed. Reg. 69034 (Dec. 6, 2007). Notably, the bald eagle does not appear on the Utah BLM's list of special status species. See State-listed and BLM listed Sensitive Species, http//www.ut.blm.gov/vernalrmpguide/state_blm_species.htm (last visited January 17, 2008).	listed on the BLM and Utah Sensitive Species List and has been listed in that section vs. the wildlife section. Conservation Measures have been kept in Appendix Q to continue protection for bald eagles.	
CrownQuest	62	82	In its discussions of the impacts of management of the Gunnison sage-grouse on mineral development, the BLM fails to specify the number of acres that will be restricted by the CSU stipulations proposed to protect the Gunnison sage-grouse under Alternatives B, C, D, and E. The BLM, however, does not identify the number of acres that will be subject to the CSU stipulations under the various alternatives. See Monticello DRMP/EIS, pgs. 4-116, 4-123, 4-132, 4-142. Without identifying the number of acres to which the CSU stipulations will apply under each alternative, the BLM cannot meaningfully compare the impacts on mineral resources.	The number of lek sites and associated habitats change from year to year and it is impossible to state the exact acreages and location of the stipulations. The stipulations will need to be attached to all potential leases within the sage-grouse habitat (a better map is available) and will be analyzed at the APD stage.	No
CrownQuest	62	84	In Section 4.3.7.4.8.6, the BLM fails to disclose the significant impacts of its management action to protect migratory bird habitat during nesting season on oil and gas development. See Monticello DRMP/EIS, pg. 4-95. The BLM has not explained why such restrictions are necessary. These restrictions are not required by the Migratory Bird Treaty Act of 1918, which permits disruptive activities in certain circumstances. 16 U.S.C. 703-712 (2006). The BLM must revise its proposed management action to ensure it is the least restrict necessary to protect the resource. Furthermore, although the management action proposes to	Although the Executive Order 13186 or the Migratory Bird Treaty Act does not state specifically what type of measures should be taken on surface disturbing activities, it is BLM's responsibility to decide how we are going to protect nesting habitat for migratory bird and by avoiding or minimizing surface disturbing activities during nesting season, the BLM is protecting migratory birds as mandated. By using the term "avoid" the BLM would consider on a case by case basis to allow a surface disturbing project if there is	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			require no surface occupancy in migratory bird habitat during nesting season, the BLM fails to identify where such habitat exists.	no reasonable alternative. At that time the activity would be done to minimize the impacts to migratory birds. BLM has added the words " or minimize" behind "avoid" to clarify this. A sentence has been added to this section to discuss how these areas will be determined. "Occupied priority migratory bird habitat will be determined with the use of Utah Partners in Flight Avian Conservation Strategy, Intermountain West Joint Venture Bird Habitat Conservation Areas, and other migratory bird conservation plans."	
CrownQuest	62	85	In section 4.3.7.4.8.7, the BLM grossly underestimates the significant impacts stipulations to protect special status species will have on oil and gas development in the Monticello RA. The BLM concludes that stipulations to protect special status species "would result in relatively minor impacts to mineral resource development at the FO-wide lever." Monticello DRMP/EIS, pg. 4-95. The BLM entirely ignores that when coupled with stipulations to protect wildlife, some combinations of stipulations to protect sensitive wildlife species proposed under Alternative B, C, and D would leave only a 15-day window for drilling operations.	It is unrealistic to assume that when a location is proposed for drilling that all the sensitive species and big game species would be located within the proposed location. Refer to the maps in the Appendix to see where the big game stipulations apply to. Surveys are conducted to determine if the species are present and what type of mitigation would be required.	No
CrownQuest	62	92	The BLM makes several assertions that cumulative impacts to special status species will occur, but does not identify any such cumulative impacts. For example, on page 4-631, the BLM states, "Resource decisions for the Moab Field Office, which is adjacent to the Monticello FO, would likely result in cumulative impacts." Similarly, the BLM states on page 4-635, "Surface disturbances associated with consumptive uses such as…oil, gas, and other minerals development would result in cumulative impacts over a larger landscape level than what is analyzed in this Monticello RMP."	Cumulative impacts, by their nature, are large, landscape-level decisions. The specificity requested by the commenter would be speculative at best.	No
CrownQuest	62	101	On page A-19, the BLM identifies a CSU/TL that provides,	The stipulations listed in Table 2.1 were removed and	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			"Where technically and economically feasible, use directional drilling or multiple wells from the same pad to reduce surface disturbance and eliminate drilling in canyon or habitat suitable for [Mexican Spotted Owl] nesting." Table 2.1 does not identify such a restriction for the Mexican Spotted Owl (MSO). See Monticello DRMP/EIS, pg 2-52, Table 2.1.	reference was made to Appendix A.	
CrownQuest	62	102	On page A-19, the BLM identifies a CSU/TL that provides, "Any activity that includes water production should be managed to ensure maintenance of enhancement of riparian habitat." Additionally, on page A-19, the BLM identifies a CSU/TL that provides, "Where technically and economically feasible, use directional drilling or multiple wells from the same pad to reduce surface disturbance and eliminate drilling in canyon or habitat suitable for [Mexican Spotted Owl] nesting." Table 2.1 does not identify these restrictions for the Mexican Spotted Owl. See Monticello DRMP/EIS, pg. 2-52, Table 2.1.	The stipulations listed in Table 2.1 were removed and reference was made to Appendix A.	Yes
CrownQuest	62	103	Table 2.1 does not identify avoidance and minimization measures Nos. 6, 7, 8, and 10 to protect the bald eagle. Compare Monticello DRMP/EIS, Appx. A, pg 2-22, Table A.1 with Monticello DRMP/EIS, pg. 2-51, Table 2.1.	The stipulations listed in Table 2.1 were removed and reference was made to Appendix A.	Yes
CrownQuest	62	104	Avoidance and minimization measure No. 2 provides, "Lease activities would require monitoring throughout the duration of the project." See Monticello DRMP/EIS, Appx. A pg. A-22, Table A.1 (emphasis added). Table 2.1 provides, Activities may require monitoring through the duration of the project." See Monticello DRMP/EIS. Pg 2-51, Table 2.1 (emphasis added).	The stipulations listed in Table 2.1 were removed and reference was made to Appendix A.	Yes
CrownQuest	62	105	Avoidance and minimization measure No. 2 references Section 7 consultation for the bald eagle. Because the bald eagle was removed from the endangered species list and is no longer listed as threatened or endangered, see 72 Fed. Reg. 37346 (July 9, 2007); 72 Fed. Reg. 69034 (December	Entire document has been adjusted to correct the status from “threatened” to “special status species”. Bald eagle is now listed on the BLM and Utah Sensitive Species List and has been listed in that section vs. the wildlife section. Conservation Measures have been kept in Appendix Q to	Yes

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			6, 2007). Section 7 consultation is no longer required.	continue protection for bald eagles.	
CrownQuest	62	106	Table 2.1 does not identify avoidance and minimization measures Nos. 3 and 4 to protect the southwestern willow flycatcher. Compare Monticello DRMP/EIS, Appx. A, pg. 2-24, Table A.1 with Monticello DRMP/EIS, pg 2-51, Table 2.1.	The stipulations listed in Table 2.1 were removed and reference was made to Appendix A.	Yes
CrownQuest	62	107	Avoidance and minimization measure No. 2 provides, "Activities would require monitoring throughout the duration of the project." See Monticello DRMP/EIS, Appx A, pg. A-24, Table A.1. Table 2.1 provides, "Activities may require monitoring through the duration of the project." See Monticello DRMP/EIS, pg 2-52, Table 2.1.	The stipulations listed in Table 2.1 were removed and reference was made to Appendix A.	Yes
CrownQuest	62	108	Avoidance and minimization measure No. 6 provides, "Activities within .0.25 mile of occupied breeding habitat would not occur during the breeding season of May 1 to August 15." See Monticello DRMP/EIS, Appx A, pg. A-24, Table A.1. Table 2.1 provides that such activities would be restricted between May 1 and "September". See Monticello DRMP/EIS, pg 2-52, Table 2.1.	The stipulations listed in Table 2.1 were removed and reference was made to Appendix A.	Yes
CrownQuest	62	109	Table 2.1 does not identify the avoidance and minimization measure "Water production will be managed to ensure maintenance or enhancement of riparian habitat" to protect endangered Colorado River fishes. Compare Monticello DRMP/EIS, Appx. A, pg. 2-26, Table A.1 with Monticello DRMP/EIS, pg. 2-52, Table 2.1.	The stipulations listed in Table 2.1 were removed and reference was made to Appendix A.	Yes
CrownQuest	62	110	Table A.1 identifies the avoidance and minimization measure "Activities would require monitoring throughout the duration of the project." See Monticello DRMP/EIS, Appx. A, pg. A-26, Table A.1 (emphasis added). Table 2.1 provides, "Activities may require monitoring through the duration of the project." See Monticello DRMP/EIS, pg. 2-52, Table 2.1 (emphasis added).	The stipulations listed in Table 2.1 were removed and reference was made to Appendix A.	Yes
Nature	214	1	1. One point states that "The protection of species and	Please refer to responses to commenter 49.	No

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Conservancy Moab Project Office			potential and/or occupied habitat for special status species would be considered and implemented prior to any authorization or action by the BLM that could alter or disturb such habitat." While it is fine to consider such SSS habitat protection, the BLM needs to give to the conservation of SSS in such cases - not necessarily a wholesale halting or precluding of other valid uses of public lands, but fine-scale design of such uses so as to be compatible with the priority of maintaining SSS habitats/occurrences. 2. A second point state that "No management action would be permitted on BLM lands that would jeopardize the continued existence of species that are listed, proposed for listing, or candidates for listing under the Endangered Species Act." Given that the BLM Manual 6840.06E and the DRMP (Page 3-140) provide Sensitive species with (at least) the same level of protection as Candidate species, then we would clarify this statement in the Final RMP to be applicable to BLM Sensitive species as well. 3. A following point states that "Inventories and monitoring studies would be conducted in order to determine special status species locations, potential habitat, population dynamics, and existing and potential threats." However, the DRMP does not specify the use of the appropriate protocols for such inventories and monitoring. A statement should be added indicating that the BLM will use protocols established for individual species. 4. Finally, a following point states that "BLM would support and implement the guidelines and management recommendations presented in species recovery or conservation plans (as updated), or alternative management		

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			strategies developed in consultation with USFWS." A stronger and more accurate statement in the Final RMP would be "the BLM will support, follow and implement current and future special status plant and animal species Recovery Plans, Conservation Plans, Strategies, and Agreements…"		
Nature Conservancy Moab Project Office	214	3	Under Table 2.1 Summary Table of Alternatives Gunnison Sage-grouse (Page 2-53) the Conservancy recommends that Alternative B - protection of lek habitat within 2 miles of active strutting grounds and year-round habitat protection within 6 miles of active strutting ground - be carried forward into the final RMP. This recommendation is based upon a briefing paper dated July 30, 2004 by the U.S. Fish and Wildlife Service (USFWS) that recommends a 5-mile buffer around lek sites. The USFWS developed their recommendation for sage-grouse based on Connelly et al. (2000) who revised and expanded the guidelines for management of sage-grouse. To summarize the recommendations the USFWS suggests the following guidelines: Specifically, for non-migratory populations occupying habitats that are uniformly distributed, they recommended protecting sagebrush and herbaceous understory with 2 miles of all occupied leks. For non-migratory populations, leks should be considered the center of year-round activity and treated as the focal points for management activities. For non-migratory populations where sagebrush is not uniformly distributed, suitable habitats should all be protected out to 3.1 miles from all occupied leks. For migratory populations for sage-grouse, breeding habitats within 11.2 miles of active leks should be protected recognizing that birds may move more that 11.2 miles from leks to nest sites. The briefing paper also reiterates the need by referencing C. Braun, who recommends that where habitat disturbances are noted, a recommended a 3-mile no-disturbance zone should be	Please refer to response to comment 49-18.	No

SSS – Special Status Species					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			implemented around lek habitats.		
Glen Canyon Institute	222	7	The DRMP states that "Special Designation areas, such as ACECs, WSAs, and WSRs would generally reduce long-term impacts to special status species that occur within their boundaries" (p. 4-424). Unfortunately, the DRMP has rejected this approach, instead choosing a flawed strategy of protecting only a few tiny areas for single species (p. 4-435, 4-438) while failing to designate adequate protected areas that do not allow ecologically damaging activities. This appears to be a direct avoidance of the requirements of the Endangered Species Act.	Special status species would still be indirectly protected in all the designated ACECs, WSAs and WSRs that are established or are existing. The tables on Pg 4-435 and 4-438 list the acres of special status species habitat that is unavailable for livestock grazing and closed or no surface occupancy for minerals. These were the only species listed because they are on the Endangered Species List or are of high interest. This table does not mean only these species are protected in only those acreages. All special status species are protected by BLM regulations and guidelines, management recommendations, recovery or conservation plans, and agreements with the Utah Division of Wildlife Resources and U.S. Fish and Wildlife Service. All future projects with be analyzed on a site-specific basis where analysis and consultation would be done with both the Utah Division of Wildlife Resources and U.S. Fish and Wildlife Service to ensure the BLM will maintain, protect, and enhance habitats of special status species. Please reference page 2-51 through 2-54 for the entire list of management actions that relate to special status species. Also reference Appendix A which lists the stipulations applicable to oil and gas leasing and other surface disturbing activities. Appendix Q lists the finalized conservation measures and best management practices for threatened and endangered species of Utah that were developed in consultation with U.S. Fish and Wildlife Service to minimize or eliminate adverse impacts to federally listed species.	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
State of Utah	4	1	The State requests that the listing on page 1-15 of the DEIS be amended to include the plans and policies indicated by Utah Code section 63-38d-401, et seq., and that BLM carefully consider consistency with this state law.	Page 1-15 lists pertinent state and county plans. The State identified no specific plans or policies which have been omitted. The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled. 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. The BLM will document the required Governor's consistency review in Chapter 5.	Yes
State of Utah	4	77	The state suggests the designation of training trails to control off-trail riding and indiscriminate OHV use around some dispersed camp areas and trailheads.	As stated in the Draft RMP/EIS (pg. 2-54) routes may be modified through subsequent implementation planning on a case by case basis. No specific trails or suggestions for "training trails" were submitted during the scoping period.	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				After the RMP is completed and on a site specific basis, the BLM could consider training trails near dispersed camp sites in areas designated in the limited or open to OHV category. The BLM will consider the commenter's recommendation.	
State of Utah	4	80	The section of the Piute Pass OHV trail that passes by the "Chocolate Drop" is closed in the plan. This section should be left open to maintain the integrity of the signed and mapped trail. Also a right-of-way across the SITLA property should be acquired to ensure continued public access.	This portion of the route is not designated in the plan due to a resource conflict within the route. BLM would make future route adjustments based on access needs, recreational opportunities, and resource constraints. These activities would be analyzed at the site-specific activity planning level.	No
State of Utah	4	81	The OHV users in the Monticello/Blanding area have worked to identify and preserve many loop trails on Public lands such as Bridger Jack, Jacob's Chair, Piute Pass and a large loop trail called Canyon Rim Riders Trail. The Utah State Parks would like to see these trails left open and opportunities preserved to complete missing sections.	Based upon the requirements of NEPA, the BLM used a systematic interdisciplinary approach fully considering physical, biological, economic, and social aspects of management actions for the range of alternatives. Plan accompanying the DRMP/EIS.BLM would make future route adjustments based on access needs, recreational opportunities, and resource constraints. These activities would be analyzed at the site-specific activity planning level.	No
State of Utah	4	82	Under Management Common to All Action Alternatives (page 2-54), closures and restrictions are the options listed for dealing with adverse impacts caused by OHVs. The state believes mitigation should be the first option considered and applied where appropriate.	The Federal regulations at 8341.2(a) state "the authorized officer shall immediately close the areas affected to the types of vehicle causing the adverse affect". This does not preclude further analysis to determine a final course of action.	No
San Juan County	7	12	San Juan County supports Alt C for travel management. The county wants the BLM to highlight specific prescriptions to promote responsible use, such as areas that would be highlighted for OHV use, maps, signing, kiosks etc. In addition, BLM assumes that all impacts are the result of OHVs and does not mention impacts to other resources, such as wildlife, from hikers, mountain bikers, and other recreationists.	In the FEIS, the travel plan selected is similar to Alternative C with some corrections to the map. Zero acres would be open to cross country travel by OHVs as opposed to 2,311 acres in Alternative C. Approximately 8 miles in Arch Canyon is designated for motorized travel up to the USFS boundary as opposed to 3.8 miles in Alternative C. The creation of OHV use designation maps, placement of signs and kiosks, etc. would be accomplished during the implementation phase of the travel plan and is discussed in	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				detail on page N-32, section N.15. Environmental consequences of alternatives such as "other recreationalist" and wildlife can be found in Chapter 4.	
Rising Sun 4x4 Club	16	4	Commenter states that there is a need for more managed open areas in alternative C. Alternative C is missing historically accessed routes. Do not close additional routes in currently designated WSAs. Camping and OHV opportunities should be explored in the SRMAs, rather than reduced.	Alternative C is only one of five alternatives considered. The range of options across all alternatives includes some of the options you list. BLM feels that the range of alternatives reasonably covers options for open areas, open routes including those in or near WSAs. There is no forgone conclusion that any one alternative or even portions of alternatives will be those chosen for the preferred alternative. Illegal “intrusions” of roads into WSAs by law must be closed. Those that were “cherry-stemmed” out of WSAs are not part of the WSA. “Extensive Recreation Management Areas (ERMAs)” which are areas not under special management allow: Alternative C - Dispersed vehicle camping would be allowed within 150 feet of the centerline of designated route on each side. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. Dispersed camping would be encouraged in previously disturbed areas. Alternative D - Dispersed vehicle camping would be allowed 300 feet of the centerline of the road on each side. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. Dispersed camping would be encouraged in previously disturbed areas. Existing “spurs” could be utilized to access primitive camping sites unless the area is specifically restricted.	No

TRR – OHV Roads and Trails					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Rising Sun 4x4 Club	16	6	Historic trails – Hole in the Rock and Old Spanish Trail are highlighted on all OHV and travel plan maps – assume they are open for OHV use.	It is confusing that the two historic trails are shown in their entirety on the OHV and travel plan maps. But, the intent is not to imply that they are open to vehicular use in their entirety. Portions of the trails are open to vehicle use. Some long established, major roads lie atop portions of the old trail systems. The entire historic trails are not open to vehicular use. The references quoted from Chapter 3 – Affected Environment state the current situation not the proposed. The term "Hole in the Rock Trail" has two different meanings. It can refer to the entire pioneer trail – some of which is unknown on the ground. It also refers to the known segment which accesses the actual "Hole in the Rock". The two reference can be confusing. The access trail does get intense legitimate use.	No
Canyon Country Heritage Association	18	3	Commenter requests no routes be designated in non-Wilderness Study Area (WSA) lands with wilderness character.	The DRMP/EIS considered a range of alternatives for protecting lands identified by the BLM with wilderness characteristics. All lands identified by the BLM with wilderness characteristics are protected from development in Alt B. Under the land use planning process the BLM must consider a range of alternatives for the lands identified with wilderness characteristics but the management of WC lands is discretionary. The BLM is not required to protect the wilderness characteristics of these lands nor preclude route designations within them.	No
Canyon Country Heritage Association	18	4	Commenter states "coincidence" is a illegitimate term when used to compare the travel plan routes and the SPEAR proposal.	Routes' being "coincident" merely means that in a comparison that they appeared on both the submitters list of routes as well as those identified by BLM. A comparison of "coincident" routes was also done between the Red Rock Heritage proposal and BLM travel plan routes.	No

TRR – OHV Roads and Trails					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Canyon Country Heritage Association	18	5	Commenter alludes to collusion between BLM and SPEAR/SJC, assumptions that connector routes are automatically assumed to be granted and that BLM is giving management of public lands to SJC.	Each "connecter" proposal will undergo individual analysis to determine, among other things, consistency with the BLM's land use plan. They are not part of the current RMP development process but will be considered on a site-by-site basis in activity-level planning. The BLM will work with San Juan County for SPEAR proposals in the implementation phase of the travel plan to consider on a site-specific basis NEPA process which routes, connectors, and staging areas are consistent with the goals and objectives of the resource management plan. BLM would recognize infrastructure additions under the Title V process, and will compare the proposed network of routes based on resource evaluations through the NEPA process Local governments are to be invited to be "cooperating agencies" in the RMP development process.	No
Canyon Country Heritage Association	18	10	Commenter asked questions about travel plan signing and commented on volunteer groups erecting signs for OHV trails. They question under what authority past signing was done.	The placement of signs, kiosks, informing and educating the public recreation users will be implemented after the signing of the RMP and will not be decided in the RMP DEIS. The implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and funding, etc. Volunteer groups have been used in the past to complete signing on BLM lands. Past signing activities are not relevant to the current RMP revision. However, they would have been done under various authorizations. For example as part of cooperative agreements or as stipulations in land use authorizations.	No

TRR – OHV Roads and Trails					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Canyon Country Heritage Association	18	13	Commenter lists routes which should be monitored and designated as limited OHV access or closed to OHV use.	The range of options across all five alternatives includes some of the options you list. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open.	No
Spear	19	6	Historic trails – Hole in the Rock and Old Spanish Trail are highlighted on all OHV and travel plan maps – assume they are open for OHV use.	It is confusing that the two historic trails are shown in their entirety on the OHV and travel plan maps. But, the intent is not to imply that they are open to vehicular use in their entirety. Portions of the trails are open to vehicle use. Some long established, major roads lie atop portions of the old trail systems. The entire historic trails are not open to vehicular use. The references quoted from Chapter 3 – Affected Environment state the current situation not the proposed. The term “Hole in the Rock Trail” has two different meanings. It can refer to the entire pioneer trail – some of which is unknown on the ground. It also refers to the known segment which accesses the actual “Hole in the Rock”. The two references can be confusing. The access trail does get intense legitimate use.	No
Spear	19	9	Commenter asks about a “proposed” OHV trail from Bluff to Butler Wash.	In MFO ID team discussions regarding the travel plan, this issue was identified as a possible conflict as there was some talk of such a proposal. However, no such formal proposal was ever received by the MFO.	No
Spear	19	10	Commenter asked questions about travel plan signing and commented on volunteer groups erecting signs for OHV trails. They question under what authority past signing was done.	The placement of signs, kiosks, informing and educating the public recreation users will be implemented after the signing of the RMP and will not be decided in the RMP DEIS. The implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				funding, etc. Volunteer groups have been used in the past to complete signing on BLM lands. Past signing activities are not relevant to the current RMP revision. However, they would have been done under various authorizations. For example as part of cooperative agreements or as stipulations in land use authorizations.	
Spear	19	13	Commenter lists routes which should be monitored and designated as limited OHV access or closed to OHV use.	The range of options across all five alternatives includes some of the options you list. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open. Including roads to be closed and left open.	No
U4WDA	21	2	BLM should adopt more managed open areas.	BLM feels that the range of alternatives reasonably covers options for open areas and open routes. In the FEIS 97 acres will be open to cross country travel by OHVs.	No
U4WDA	21	5	Commenter does not believe any routes should be closed in currently designated WSAs.	Illegal “intrusions” of roads into WSAs by law must be closed. Those that were “cherry-stemmed” out of WSAs are not part of the WSA.	No
U4WDA	21	6	The BLM should continue to allow vehicles to access campsites via existing spur roads connecting to designated routes.	In “Extensive Recreation Management Areas (ERMAs)” which are areas not under special management allow: Alternative C - Dispersed vehicle camping would be allowed within 150 feet of the centerline of designated route on each side. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. Dispersed camping would be encouraged in previously disturbed areas. Alternative D - Dispersed vehicle camping would be allowed	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				300 feet of the centerline of the road on each side. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. Dispersed camping would be encouraged in previously disturbed areas. Existing "spurs" could be utilized to access primitive camping sites unless the area is specifically restricted.	
U4WDA	21	7	Commenter asserts that Alternative C is missing some historical accessed routes. They include a list of routes that believe should remain open in their entirety.	The range of options across all five alternatives includes some of the options you list. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open. There is no forgone conclusion that any one alternative or even portions of alternatives will be those chosen for the preferred alternative Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.	No
U4WDA	21	8	Commenter believes that the BLM should recognize the RS2477 road claims that are part of San Juan County's transportation plan.	It is beyond the scope of this document to make determinations on R.S.2477 claims. In the Tenth Circuit Court decision – SUWA v. BLM – September 8, 2005, the court noted that ultimately deciding who holds legal title to an interest in real property, including R.S.2477 right of way, "is judicial, not an executive, function." 425 F.3d at 752. Chapter one of the DEIS states at ISSUES BEYOND THE SCOPE OF THE PLAN Settlement of R.S. 2477 (i.e., right-of-way) claims. The State of Utah and San Juan and Grand Counties may hold valid existing rights-of-way in the PA according to Revised Statute (R.S.) 2477, Act of July 28 1866, chapter 262, 8, 14 Stat. 252, 253, codified at 43 U.S.C. 932. On October 21, 1976, Congress repealed R.S. 2477 by passing the FLPMA. This RMP does not adjudicate, analyze,	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				or otherwise determine the validity of claimed rights-of-way. However, nothing in the RMP extinguishes any valid right-of-way or alters in any way the legal rights the state and counties may have to assert and protect R.S. 2477 rights or challenge in federal court or other appropriate venues.	
U4WDA	21	9	Commenter states that the Arch Canyon Trails has historic access that should be protected and upheld in this RMP.	Letters from the USFWS concerning on-going issues with Mexican spotted owl habitat in Arch Canyon, and discussions in coordination with BLM and UDWR, are the basis for choices made by the ID team in evaluating draft alternatives. In the FEIS approximately 7 miles in Arch Canyon is designated for motorized travel up to the USFS boundary as opposed to 4 miles in Alternative C.	No
Capital Trail Vehicle Association	23	1	The commenter supplied a voluminous text of pro-motorized recreation comments. The document appeared to have been created to address Forest Service issues in other states than Utah. The comments dispersed throughout the document area categorized by general topic in the following blocks.	The commenter supplied a voluminous text of pro-motorized recreation comments. The document appeared to have been created to address Forest Service issues in other states than Utah. The comments dispersed throughout the document are categorized by general topic in the following blocks.	No
Capital Trail Vehicle Association	23	2	Need and demand for more open areas.	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. BLM feels that the range of alternatives reasonably covers the options for open areas.	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				In the FEIS 97 acres will be open to cross country travel by OHVs.	
Capital Trail Vehicle Association	23	5	States there is a need for more single track routes.	A range of management actions was developed to address the issues identified by the public during scoping. The BLM did give full consideration to the concept that a desirable BLM Travel Plan contains an equitable allocation between non-motorized and motorized recreation. 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.	No
Blue Ribbon Coalition	24	10	Commenter would like to encourage coordination with OHV user groups for OHV management decisions.	Please refer to response to comment 24-8.	No
Southern Utah Wilderness Alliance	26	11	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 Monticello FO. The commenter alleges that the BLM asserts that travel on designated routes would have negligible impacts on vegetation because past use has already occurred.	The impacts of travel on natural resources are analyzed in Chapter 4 of the DRMP/EIS. Chapter 3 of the DRMP/EIS on Travel is the baseline for analysis in Chapter 4. On page 3-152 BLM presents the baseline which includes 6,452 miles of non-paved routes. This number represents the baseline for analysis. It is not reasonable or practical to consider the impacts resulting from the creation of this route network.	No
Southern Utah Wilderness Alliance	26	19	The BLM's failure to analyze and present information about impacts of existing ORV use violates its NEPA duties. BLM falsely assumes that designating routes causes no new	Based upon the requirements of NEPA, the BLM used a systematic interdisciplinary approach fully considering physical, biological, economic, and social aspects of	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			damage. The commenter alleges that trail designation "does cause damage by facilitating back country use where enforcement and monitoring are extremely challenging."	management actions for the range of alternatives. The BLM can not analyze the impacts of illegal activities. It is assumed that the public will adhere to the Travel Plan accompanying the DRMP/EIS.	
Lynell Schalk	29	19	Each of the five alternative travel plan maps most two "Historic Trails," The Hole-in-the-Rock Trail and the Spanish Trail, under the title of "OHV and Travel Plan" (Reference Maps 49, 50, 51, 52, and 53). These trails are actually drawn onto the Travel Plan map. The reader has to assume that these two historic trails are proposed in all 5 alternatives to be open as OHV roads or trails. Is this what the agency is proposing? None of the four BLM employees I talked to at the Montezuma Creek meeting could explain why this route was depicted on the Travel Plan alternative maps, including the MFO planning coordinator and one of the outdoor recreation planners.	It is confusing that the two historic trails are shown in their entirety on the OHV and travel plan maps. But, the intent is not to imply that they are open to vehicular use in their entirety. Portions of the trails are open to vehicle use. Some long established, major roads lie atop portions of the old trail systems. The entire historic trails are not open to vehicular use. They have been deleted from the OHV/Travel Plan maps in the FEIS. The references quoted from Chapter 3 – Affected Environment state the current situation not the proposed. The term “Hole in the Rock Trail” has two different meanings. It can refer to the entire pioneer trail – some of which is unknown on the ground. It also refers to the known segment which accesses the actual “Hole in the Rock”. The two reference can be confusing. The access trail does get intense legitimate use.	Yes
Lynell Schalk	29	20	The route of the Hole-in-the-Rock Trail is largely inaccurate as to its plotted location, often miles from where the trail can actually be found on the ground, as well as being plotted where it can no longer be traced. What is most unsettling about the DRMP map is that it shows the Hole-in-the-Rock Trail leading directly into the town of Bluff. There is no evidence on the ground of the trail between Butler Wash and Bluff, yet the BLM has plotted in on its DRMP map.	Please refer to response to comment 29-19.	Yes
Lynell Schalk	29	23	In Alternative C and D (Reference: 2.1.1.1 Travel Management, pg. 2-3, Vol. 1), 2,311 acres are listed as	The BLM Manual at 8342.1 identifies protection requirements for OHV designation. The following resources must be	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			proposed to be OHV open areas, i.e. open to random cross-country travel. I was unable to locate a map or description of where these proposed "open" lands are specifically located anywhere in the document or in the Travel Plan maps other than references to Butler Wash and Indian Creek. I enlarged the travel maps and still was unable to locate and "open" areas. How can the public comment on whether these are "suitable" areas for cross-country travel, if there is no information regarding specifically where they are located or what resources they contain?	considered in the designation process; cultural, historical, archaeological, soil, water, air, scenery, vegetation, wildlife, wildlife habitat, threatened or endangered species, and wilderness suitability. The larger open area poses conflicts with many of these resources. An area of 97 acres currently designated as an open area near U-95 in Butler Wash is proposed to remain as an open area to provide recreation opportunities of this nature in the area best suited for this activity.	
Lynell Schalk	29	27	The DRMP in this section (Reference: pg. 2-32 through 2-33, Vol. 1) does not address whether motorized access is allowed for "Native American traditional purposes." Under the DRMP, will Native Americans be allowed to drive their vehicle into riparian areas to conduct their "traditional purposes?" If so, Native American traditional use does not historically include motorized vehicles. Other than "emergency vehicles," there should be no exceptions to the rule.	At 4.3.20.3.2.5. It states: Impacts of Riparian Decisions on Woodlands The impacts to woodland resources would be the same as those discussed under Alternative A for riparian resources, except that: (1) riparian woodland harvesting (cottonwood and willow) for traditional purposes would be allowed, and (2) OHV use in specified riparian areas would be designated as closed. Native American harvesting of riparian woodlands for traditional purposes would have negligible or minor impacts on riparian woodland resources because restrictions on harvesting would be implemented as necessary to protect and enhance the riparian woodland resource.	No
Maryland Ornithological Society, Inc	38	2	We question whether the route system in Alternative C can be allowed under Executive Order 11644, which spells out criteria for ORV route designation. Those criteria direct the agency to minimize disruption of wildlife habitat and to minimize conflicts with other recreational activities. Alternative C will exacerbate ORV damage, leading to degradation of wildlife habitat as more and more ORVs travel on the closely spaced network of routes. BLM should design a much more limited route system. An essential step is to close all routes in the areas with wilderness character, as indicated in Alternative E (Map 53).	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis. Based upon the requirements of NEPA, the BLM used a systematic interdisciplinary approach fully considering physical, biological, economic, and social aspects of management actions for the range of alternatives.	No

TRR – OHV Roads and Trails					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
National Parks Conservation Association	44	2	It is particularly troubling that BLM has included designated ORV routes that are within the boundaries of Canyonlands National Park. This error needs to be removed. The BLM also needs to address how it will monitor routes it intends to designate that run up to the park boundaries.	The roads in lands administered by the Park Service have been removed from the OHV and travel plan maps. The placement of signs, kiosks, informing and educating the public recreation users as well as monitoring route usage will be implemented after the signing of the RMP and are not addressed nor will they be decided in the RMP process.	Yes
Public Lands Equal Access Alliance	46	1	The following are routes that we would like to be changed to open in the final route designation Chocolate Drop: (Range 14 East Township 36 south sections 35 and 36 and 37 South sections 3 and 2) In Alternative C it shows these routes as closed to motorized travel. This route is important to the OHV community; it is an important connector for the loop trail on the Piute Pass trail. It gives them the trail experience that they are looking for and the scenic vistas they enjoy.	Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis. This section is proposed to be closed because of a resource conflict.	No
Bluff Landowners Coalition	48	2	The BLM's mission as referenced in Appendix E (Vol. 3) states that the "…public lands will be managed so that various services, activities, and all renewable resources of the land are environmentally sustainable and non-renewable resources are recovered in ways that ensure the long-term health of the land." According to the BLM's Standards for Rangeland Health of BLM Lands in Utah: "Designate areas for intensive recreational use or cross-country motorized travel where disturbance of soil and vegetation is acceptable, either because impacts are insignificant and/or temporary or because the value of	The BLM utilized 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 (Appendix R of the DRMP/DEIS). On pg. R-2, 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". The Butler Wash open OHV area was set aside for such use several years ago. A cultural resource inventory was completed for the area and fencing was constructed to contain the OHV use within the fenced area which would preclude OHV use over cultural sites. The intent of fencing	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			intensive use of the land outweighs whatever ecological changes may occur. Decisions on such designation should take into account conflicts with other users as well as adverse effects on archaeological or historical sites." The above stated policy and direction clearly precludes an OHV open area in the Butler Wash area along U-95. The disturbance as it currently stands is not "temporary." There are archaeological and paleontological sites in the play area; there is conflict with other quiet users; and the OHV trails impact the scenic values of the U-95 corridor.	was to also prevent travel in the riparian zone. After further consideration, BLM decided to maintain this area as open to OHV use, the only such area within the Monticello PA.	
Robert Telepak	128	2	Missing Connector Road from Piute Trail past Chocolate From to Red Canyon Road The Piute Pass Trail is a really great trail the way your map shows it. But it is even better if it can be dons as a loop.	This portion of the route is not designated in the plan due to an archaeological site within the route. BLM would make future route adjustments based on access needs, recreational opportunities, and resource constraints. These activities would be analyzed at the site-specific activity planning level.	No
Robert Telepak	128	3	Other Missing Trail Routes or Segments Separately, the Utah Four Wheel Drive Association (U4WDA) has identified and brought to your attention several historically accessed routes that have been omitted from Alternative C. I have reviewed their data and definitely agree they should be included in Alternative C. The Route Numbers in question are: B107, B250, B260, D0010, D0011, D0012, D0013, D0023, D0042, D0044, D0057, D0059, D0060, D0177, D0210, D0211, D0212, D0244, D0246, D0575, D1918,D1921, D2037, D2117, D2153, D3486, D3487, D3522, D3983, D4668, D4779.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.	No

TRR – OHV Roads and Trails					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Please include all of these routes in Alternative C.		
Mary Meloy	220	3	The motor vehicle access up the river from the mouth of Lime Creek should be prohibited as it severely degrades the wilderness experience of river boaters and also impacts the occupied big horn sheep habitat across the river. That impact is ignored by the plan.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis. In the FEIS, Lime Creek campsite is reserved for river runners only and the access up the river from the mouth of Lime Creek is closed to motor vehicle/mechanized use. In the FEIS, Lime Creek campsite is reserved for river runners only and the access up the river from the mouth of Lime Creek is closed to motor vehicle/mechanized use.	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
National Park Service Intermountain Region	3	6	Since the RMP does not apply to travel management within NPS units, the NPS would prefer that all roads within the NPS units be removed from the map.	Changes have been made to the Travel Plan (maps 49-53) as suggested by the commenter.	Yes
State of Utah	4	26	The RMP should specifically state that: 1) SITLA will be permitted continued access to trust lands where motorized access is currently available; 2) SITLA may undertake reasonable maintenance activities of existing access across BLM lands; and 3) existing access routes to state trust lands will not be closed without approval by SITLA and the State.	The travel plan provides restrictions to the public for recreational purposes, but does not restrict uses permitted or authorized by the BLM. State inholdings may or may not currently have access, depending upon whether or not existing vehicle routes lead to them. Under different alternative scenarios, existing routes may be proposed to closure. BLM policy, as required by the Cotter decision (State of Utah v. Andrus, 10/1/79), is that "the state must be allowed access to the state school trust lands so that those lands can be developed in a manner that will provide funds for the common school…" This decision confined the issue of access to situations directly involving economic revenues generated for the school trust. The recreation restrictions do not prohibit the State from reasonable access to its lands for economic purposes through separate permit authorization as specified by the Cotter decision. Routes to State sections may not have been identified for recreation purposes due to resource conflicts or actual route conditions.	No
State of Utah	4	27	The state urges the BLM to consider San Juan County's transportation map and to make BLM's transportation plan consistent with the county desires to keep roads and routes open.	The BLM under its multiple use mandate has considered the needs of a wide variety of recreationists in the DRMP/EIS alternative formulation. The BLM analyzed each travel route according to its purpose and need weighed against potential resource conflicts. This process is detailed in Appendix N of the DRMP/EIS. As described in Appendix N, the BLM's travel plan formulation involved numerous meetings of an interdisciplinary team (including vegetation, soils, wildlife and cultural resource specialists). Potential resource conflicts were identified, their extent evaluated, and then weighed	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				against purpose and need for the particular route BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open under discussion. The DEIS/RMP provides five alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping.	
State of Utah	4	51	Table 2-1 – Summary Table of Alternatives – Lands and Realty (Pages 2-15). It should be noted under all alternatives that, pursuant to Utah v. Andrus, BLM is obligated to grant reasonable access to the State of Utah and its grantees to school trust lands. In furtherance of this obligation, no existing roads providing access to trust lands should be closed without the consent of SITLA.	The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). A sentence has been added to Chapter 2, Lands and Realty, Management Common to All Action Alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79). In addition, the travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision.	Yes
State of Utah	4	57	Section 3.17.3 – Travel Issues (Pages 3-152). Certain existing routes that provide the only physical access to trust lands sections would not be “Designated Routes”, and motorized access on such routes would be terminated. The Draft RMP fails to address the impact of these closures on the economic value of the affected trust lands.	The BLM does provide for reasonable access to all SITLA lands under all alternatives. A sentence has been added to Chapter 2, Lands and Realty, Management Common to All Action Alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79). In addition, the travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision.	Yes
State of Utah	4	79	It is unclear in Map 51 whether or not routes shown in brown within the closed areas are open or closed. The state recommends that all of these routes remain open and the map and its legend are modified.	The routes within the "Closed" areas are those that would remain open to vehicle use. These routes are either major county roads or access routes to trail heads or State lands. The map has been modified to clarify this point.	Yes

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
State of Utah	4	83	Table ES 1 – OHV Categories by Alternative. The BLM should ensure that access to remote irrigation facilities like diversions, gates, and canals are preserved.	These type of actions are administrative and do not require land use planning decisions to accomplish. The OHV category designations do not apply to administrative uses.	No
Ute Mountain Ute Tribe	6	7	OHV use on proposed routes has the potential to cause increased soil erosion and related water pollution and trespass on Ute lands.	The purpose of the DEIS and DRMP is to take a hard look at the current situation and BLM contends that a hard look was taken using all required laws and regulations. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open.	No
Ute Mountain Ute Tribe	6	11	The Cottonwood Canyon road and the road leading to Arch Canyon are both BIA roads that the Tribe could potentially close. Proposed route designation of these routes will direct OHV traffic towards Tribal lands and BLM will not have adequate resources to prevent trespass on these lands. Given that these roads are subject to closure by the Tribe, it is inappropriate for BLM to designate these routes open and the Tribe requests that they be closed.	The DEIS DRMP deals only with routes on BLM lands. If the Ute Tribe were to close the portion of routes across their land into Arch Canyon and South Cottonwood, BLM would have to consider areas for rerouting to avoid crossing Ute lands.	No
San Juan County	7	8	Table 2.1 at page 2-56 indicates the amount of "Open B-Class Roads" and Open D-Class Road" varies across alternatives. Please clarify the authority under which BLM would designate county roads, and what happens to a class B, C, or D road if BLM chooses not to designate it.	It is beyond the scope of this document to make determinations on R.S.2477 claims. In the Tenth Circuit Court decision – SUWA v. BLM – September 8, 2005, the court noted that ultimately deciding who holds legal title to an interest in real property, including R.S.2477 right of way, “is judicial, not an executive, function.” 425 F.3d at 752. Chapter one of the DEIS states at 1.3.3 ISSUES BEYOND THE SCOPE OF THE PLAN Settlement of R.S. 2477 (i.e., right-of-way) claims. The State of Utah and San Juan County may hold valid existing rights-of-way in the PA according to Revised Statute (R.S.) 2477, Act of July 28 1866, chapter 262, 8, 14 Stat. 252, 253, codified at 43 U.S.C. 932. On October 21, 1976, Congress repealed R.S. 2477 by passing the FLPMA. This RMP does not adjudicate, analyze, or otherwise determine the validity of claimed rights-of-way. However, nothing in the RMP extinguishes any valid right-of-way or alters in any way the legal rights the state and counties may have to assert and protect R.S. 2477 rights or	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				challenge in federal court or other appropriate venues. Routes are coincident merely meaning that in a comparison that they appeared on both the County's list of routes as well as those identified by BLM.	
San Juan County	7	9	Any closure of a state or county road within BLM administered lands will require assent of all parties with an interest in the road. BLM should carefully coordinate travel management with local governments and take care to avoid impinging upon the state's legal interests in public roads.	San Juan County was a cooperator in the development of the Travel plan. Each route was discussed with the County planner along with BLM resource specialists. As in the past, no route closures would be done without consultation and agreement with San Juan County officials, as has been done in the past.	No
San Juan County	7	10	Access is of major concern to San Juan County. The County has been working with the BLM to get a road maintenance agreement which conforms to the 10th Circuit ruling.	BLM is as eager as the County to develop a Road Maintenance Agreement (RMA) between the two which satisfies the 10th Circuit Court 2005 ruling as well as both the County and BLM. However, a RMA would be developed and implemented after the signing of the RMP and not addressed nor will they be decided in the RMP DEIS.	No
San Juan County	7	51	Pg. 2-40 - The OHV open area is not included under Alternative C for the Indian Creek ACEC. This seems to be an oversight since it is addressed in other portions of the plan. The County supports Alternative C for this area provided the OHV open area is included.	The Indian Creek open to OHV area is not to be confused with the Indian Creek ACEC. The ACEC was established to maintain visual resources and it has been closed to OHV use since its establishment and is to remain that way in Alternative C. The ACEC was never included in the 2214 acres in the Indian Creek area that is open to OHV use in certain alternatives.	No
Rising Sun 4x4 Club	16	2	The BLM should recognize the RS2477 road claims that are part of San Juan Transportation plan.	It is beyond the scope of this document to make determinations on R.S.2477 claims. In the Tenth Circuit Court decision – SUWA v. BLM – September 8, 2005, the court noted that ultimately deciding who holds legal title to an interest in real property, including R.S.2477 right of way, “is judicial, not an executive, function.” 425 F.3d at 752.	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				Chapter one of the DEIS states at 1.3.3 ISSUES BEYOND THE SCOPE OF THE PLAN Settlement of R.S. 2477 (i.e., right-of-way) claims. The State of Utah and San Juan and Grand Counties may hold valid existing rights-of-way in the PA according to Revised Statute (R.S.) 2477, Act of July 28 1866, chapter 262, 8, 14 Stat. 252, 253, codified at 43 U.S.C. 932. On October 21, 1976, Congress repealed R.S. 2477 by passing the FLPMA. This RMP does not adjudicate, analyze, or otherwise determine the validity of claimed rights-of-way. However, nothing in the RMP extinguishes any valid right-of-way or alters in any way the legal rights the state and counties may have to assert and protect R.S. 2477 rights or challenge in federal court or other appropriate venues.	
Rising Sun 4x4 Club	16	3	The final plan should direct land managers to educate the non-motorized visitors where they may encounter vehicle traffic in certain areas as well as informing them of areas where they may avoid such encounters. This should include signage where necessary.	In the final RMP, designated OHV routes will be portrayed by a map entitled "Field Office Travel Plan and Map". This map is then the basis for route signing and enforcement. The field office will prioritize actions, resources, and geographic areas for implementation. The implementation goals include completing signage, maps, public information, kiosks, and working with partners. The placement of signs, kiosks, informing and educating the public recreation users will be implemented after the signing of the RMP and will not be decided in the RMP DEIS. The implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and funding, etc.	No
Rising Sun 4x4 Club	16	5	Commenter requests that BLM allow adequate access to campsites via existing spur roads off the designated routes.	In “Extensive Recreation Management Areas (ERMAs)” which are areas not under special management allow: Alternative C - Dispersed vehicle camping would be allowed within 150 feet of the centerline of designated route on each	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				side. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. Dispersed camping would be encouraged in previously disturbed areas. Alternative D - Dispersed vehicle camping would be allowed 300 feet of the centerline of the road on each side. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. Dispersed camping would be encouraged in previously disturbed areas. Existing "spurs" could be utilized to access primitive camping sites unless the area is specifically restricted.	
Sierra Club Utah Chapter	17	1	Relating to the travel plan, the commenter states that the DRMP contains only a cursory discussion of the impacts of roads on the human environment and that the information provided is inadequate for the agency to make an informed decision about the transportation plan.	The process of development and content of the preliminary draft Monticello travel plan are described in Appendix N. BLM feels that the range of alternatives reasonably covers the options and the impact analysis is adequate to form a decision. Chapter 4 is an extensive analysis for weeds, wildlife, cultural sites, wilderness (as well as a "host of other issues") included impacts from all resources uses such as the relationship of roads and other mechanized routes.	No
Sierra Club Utah Chapter	17	2	Commenter makes many allegations about BLM using San Juan County's road maps for purposes of planning. They further allege that by using and recognizing state and county road claims BLM is making a decision that will be difficult to change in the future.	San Juan County's data was used as it was an inventory of the route footprint on the ground. At N.8. of the Travel Plan it states: "MFO began the process following the Utah BLM State Office (UTSO) approach. In the initial stages of the planning process, it was agreed that San Juan County's route inventory would serve as a baseline for route data since it was the most complete inventory for the field office area." BLM went through a verification process to determine the validity of the County data. N.8 further states: "Monticello Field Office used a sampling of the San Juan County route data to verify the validity of the [inventory]."	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				At N.7 DEVELOPING PLANNING CRITERIA the Travel Plan States: No regulations to either assert or recognize R.S. 2477 rights-of-way currently exist. While R.S. 2477 claims have been asserted by San Juan County, it is beyond the scope of this document to recognize or reject R.S. 2477 assertions, and this issue is not addressed further in this Travel Plan. Nothing in this document is intended to provide evidence bearing on or addressing the validity of any R.S. 2477 assertions. At such time as a decision is made of R.S. 2477 assertions, BLM will adjust travel routes accordingly, where necessary. [emphasis added]	
Sierra Club Utah Chapter	17	3	Commenter states that the use of data from SPEAR violates the direction of Congress and the Data Quality Act.	At 8.2 of the travel plan "Route Data Input from the Public" there is a list of individuals and organizations submitting route data. This included data submitted by the Redrock Heritage Coalition. All route data was compared to the routes identified by the BLM to identify those that were coincident. Routes' being "coincident" merely means that in a comparison that they appeared on both the submitters list of routes as well as those identified by BLM.	No
Sierra Club Utah Chapter	17	4	Commenter states: "The relationship of roads and other mechanized routes to weeds, wildlife, cultural sites, wilderness, landscapes resilient to global and local climate change, and a host of other issues must be analyzed."	Chapter 4 is an extensive analysis for weeds, wildlife, cultural sites, wilderness (as well as a "host of other issues") included impacts from all resources uses such as the relationship of roads and other mechanized routes. 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	Yes

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				climate change. This statement has been added to Chapter 3 of the PRMP/FEIS. The Environmental Protection Agency (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. A statement to this effect has been added to Chapter 4 of the PRMP/FEIS.	
Sierra Club Utah Chapter	17	5	Commenter asks "What research did the MFO use to determine the best way to manage ORVs?"	The Travel Plan at 4.0 lists all the policy, laws, etc. that the BLM is required to use in developing a travel plan. These include research – usually on a national level. MFO did not conduct any localized research as that is not a requirement nor did they have the resources to do so.	No
Canyon Country Heritage Association	18	6	Historic trails – Hole in the Rock and Old Spanish Trail are highlighted on all OHV and travel plan maps – assume they are open for OHV use.	It is confusing that the two historic trails are shown in their entirety on the OHV and travel plan maps. But, the intent is not to imply that they are open to vehicular use in their entirety. Portions of the trails are open to vehicle use. Some long established, major roads lie atop portions of the old trail systems. The entire historic trails are not open to vehicular use. These trails have been removed from the travel plan maps to eliminate this confusion. The references quoted from Chapter 3 – Affected Environment state the current situation not the proposed. The term "Hole in the Rock Trail" has two different meanings. It can refer to the entire pioneer trail – some of which is unknown on the ground. It also refers to the known segment which accesses the actual "Hole in the Rock". The two references can be confusing. The access trail does get	Yes

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				intense legitimate use.	
Canyon Country Heritage Association	18	7	Commenter complains that maps of SPEAR submission were to be made available for public review at the MFO and that they were told that MFO does not have the maps.	At N 8.2.3 It states: "BLM will complete their travel plan process and in so doing will compare the BLM designated routes with those proposed by SPEAR. In the planning process BLM will make note of the SPEAR routes that are coincidental to the BLM travel plan routes in the DEIS (a summary and comparisons of BLM travel plan to the SPEAR routes can be viewed at the Monticello FO). It does NOT state that maps will be available only that the summary and comparison would be, which they are.	No
Spear	19	4	Commenter states "coincidence" is an illegitimate term when used to compare the travel plan routes and the SPEAR proposal.	Routes' being "coincident" merely means that in a comparison that they appeared on both the submitters list of routes as well as those identified by BLM. A comparison of "coincident" routes was also done between the Red Rock Heritage proposal and BLM travel plan routes.	No
Spear	19	5	Commenter alludes to collusion between BLM and SPEAR/SJC, assumptions that connector routes are automatically assumed to be granted and that BLM is giving management of public lands to SJC.	Each "connecter" proposal will undergo individual analysis to determine, among other things, consistency with the BLM's land use plan. They are not part of the current RMP development process but will be considered on a site-by-site basis in activity-level planning. The BLM will work with San Juan County for SPEAR proposals in the implementation phase of the travel plan to consider on a site-specific basis NEPA process which routes, connectors, and staging areas are consistent with the goals and objectives of the resource management plan. BLM would recognize infrastructure additions under the Title V process, and will compare the proposed network of routes based on resource evaluations through the NEPA process. Local governments are to be invited to be "cooperating agencies" in the RMP development process.	No

TRV – Travel Management					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Spear	19	7	Commenter complains that maps of SPEAR submission were to be made available for public review at the MFO and that they were told that MFO does not have the maps.	At N 8.2.3 It states: "BLM will complete their travel plan process and in so doing will compare the BLM designated routes with those proposed by SPEAR. In the planning process BLM will make note of the SPEAR routes that are coincidental to the BLM travel plan routes in the DEIS (a summary and comparisons of BLM travel plan to the SPEAR routes can be viewed at the Monticello FO). It does NOT state that maps will be available only that the summary and comparison would be, which they are.	No
Red Rock 4-Wheelers	20	4	Commenter states that restricting motorized and mechanized travel for Arch Canyon as in alternatives B, C, and E is unnecessary.	Letters from the USFWS concerning on-going issues with Mexican spotted owl habitat in Arch Canyon, and discussions in coordination with BLM and UDWR, are the basis for choices made by the ID team in evaluating draft alternatives. In the FEIS approximately 7 miles in Arch Canyon is designated for motorized travel up to the USFS boundary as opposed to 4 miles in Alternative C.	No
Ride with Respect	22	1	The travel plan provides virtually no (non-road) trails. Mountain biking, motorcycling and ATV riding will be substantially restricted by the DRMP and travel plan. Suggest 200 miles of such trails some of which would connect to similar trails on Forest Service lands.	A range of management actions was developed to address the issues identified by the public during scoping. The BLM did give full consideration to the concept that a desirable BLM Travel Plan contains an equitable allocation between non-motorized and motorized recreation. 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.	No

TRV – Travel Management					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Capital Trail Vehicle Association	23	6	Commenter states that a travel plan must be done.	In the final RMP, designated OHV routes will be portrayed by a map entitled "Field Office Travel Plan and Map". This map is then the basis for route signing and enforcement. The field office will prioritize actions, resources, and geographic areas for implementation. The implementation goals include completing signage, maps, public information, kiosks, and working with partners.	No
Capital Trail Vehicle Association	23	9	Commenter includes a lengthy discussion on RS2477.	It is beyond the scope of this document to make determinations on R.S.2477 claims. In the Tenth Circuit Court decision – SUWA v. BLM – September 8, 2005, the court noted that ultimately deciding who holds legal title to an interest in real property, including R.S.2477 right of way, "is judicial, not an executive, function." 425 F.3d at 752. Chapter one of the DEIS states at ISSUES BEYOND THE SCOPE OF THE PLAN Settlement of R.S. 2477 (i.e., right-of-way) claims. The State of Utah and San Juan and Grand Counties may hold valid existing rights-of-way in the PA according to Revised Statute (R.S.) 2477, Act of July 28 1866, chapter 262, 8, 14 Stat. 252, 253, codified at 43 U.S.C. 932. On October 21, 1976, Congress repealed R.S. 2477 by passing the FLPMA. This RMP does not adjudicate, analyze, or otherwise determine the validity of claimed rights-of-way. However, nothing in the RMP extinguishes any valid right-of-way or alters in any way the legal rights the state and counties may have to assert and protect R.S. 2477 rights or challenge in federal court or other appropriate venues.	No
Blue Ribbon Coalition	24	1	Commenter questions development of a project-level Travel Plan of the detail and complexity attempted in the DRMP. A land use plan is designed to guide and control future management actions and the development of subsequent, more detailed and limited scope plans for resources uses. Commenter requests severing project-level travel planning for subsequent analysis in a stand-alone public process.	BLM guidance states: H-1601-1 — LAND USE PLANNING HANDBOOK – (Public) - Appendix C, pages 17- 18 Land Use Plan Decisions. Delineate travel management	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				areas and designate off-highway vehicle management areas. 1. Delineating Travel Management Areas. Comprehensive travel management planning should address all resource use aspects (such as recreational, traditional, casual, agricultural, commercial, and educational) and accompanying modes and conditions of travel on the public lands, not just motorized or off-highway vehicle activities. In the RMP, travel management areas (polygons) should be delineated. Identify acceptable modes of access and travel for each travel management area (including over-land, overwater, over-snow and fly-in access [remote airstrips and float planes]). In developing these areas, consider the following: a. Consistency with all resource program goals and objectives; b. primary travelers; c. objectives for allowing travel in the area; d. setting characteristics that are to be maintained (including recreation opportunity system and VRM settings); and e. primary means of travel allowed to accomplish the objectives and to maintain the setting characteristics. 2. Designation of Off-Highway Vehicle Management Areas. All public lands are required to have off-highway vehicle area designations (see 43 CFR 8342.1). Areas must be classified as open, limited, or closed to motorized travel activities. Criteria for open, limited, and closed area designations are established in 43 CFR 8340.0-5(f), (g) and (h), respectively.	
Blue Ribbon Coalition	24	2	The DEIS does not adequately analyze routes with overlapping or concurrent jurisdiction. It does not specify if a route is a road, trail or primitive road pursuant to agency directives. It should include a discussion regarding the dispute over County roads.	H-1601-1 — LAND USE PLANNING HANDBOOK – (Public) - Appendix C, page 19 Implementation Decisions. Complete a defined travel management network (system of areas, roads and/or trails) during the development of the land use plan, to the extent	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				practical. If it is not practical to define or delineate the travel management network during the land use planning process, a preliminary network must be identified and a process established to select a final travel management network. Possible reasons for not completing the final network might be size or complexity of the area, controversy, incomplete data, or other constraints. The dispute over County roads is based in RS2477 claims by the County on those roads. It is beyond the scope of this document to make determinations on R.S.2477 claims. In the Tenth Circuit Court decision – SUWA v. BLM – September 8, 2005, the court noted that ultimately deciding who holds legal title to an interest in real property, including R.S.2477 right of way, "is judicial, not an executive, function." 425 F.3d at 752. Chapter one of the DEIS states at ISSUES BEYOND THE SCOPE OF THE PLAN Settlement of R.S. 2477 (i.e., right-of-way) claims. The State of Utah and San Juan and Grand Counties may hold valid existing rights-of-way in the PA according to Revised Statute (R.S.) 2477, Act of July 28 1866, chapter 262, 8, 14 Stat. 252, 253, codified at 43 U.S.C. 932. On October 21, 1976, Congress repealed R.S. 2477 by passing the FLPMA. This RMP does not adjudicate, analyze, or otherwise determine the validity of claimed rights-of-way. However, nothing in the RMP extinguishes any valid right-of-way or alters in any way the legal rights the state and counties may have to assert and protect R.S. 2477 rights or challenge in federal court or other appropriate venues.	
Blue Ribbon Coalition	24	6	Why isn't the Monticello BLM using the Road, Primitive Road, Trail paradigm developed by the agency?	The commenter is referring to the titles used with the BLM's Facilities Asset Management System. These names do not apply to the process of route designation.	No
Southern Utah Wilderness	26	3	The commenter stated that a significant number of scoping comments called for ORV use restrictions and appropriate	A range of ORV restrictions were spread across alternatives. Management was consistent with the goals and objectives of	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Alliance			route designations to protect resources.	the different alternatives. The purpose of the DEIS and DRMP is to take a hard look at the current situation and BLM contends that a hard look was taken using all required laws and regulations. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open.	
Southern Utah Wilderness Alliance	26	6	In the context of this RMP, 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.	The direct, indirect, and cumulative impact analyses were analyzed in Chapter 4 of the DRMP/EIS. Land use planning decisions do not require site specific analyses; however, site specific analyses were conducted appropriate to the level of the decision. In particular, the travel planning decisions include site specific analysis.	No
Southern Utah Wilderness Alliance	26	9	Accurate, scientific analysis is wholly lacking with regard to travel planning, as well as many other aspects of the Monticello Draft RMP.	Based upon the requirements of NEPA, the BLM used a systematic interdisciplinary approach fully considering physical, biological, economic, and social aspects of management actions for the range of alternatives.	No
Southern Utah Wilderness Alliance	26	22	The commenter states, "The DRMP declares that the impacts of the preferred alternative will increase protection over Alternative A by implementing a route designation scheme." They allege that BLM does not quantify this. And there is no analysis of the likelihood that route designation will harm unknown sites. Impacts to cultural sites in the Butler Wash "open" area are not analyzed.	The DRMP/EIS discusses the impacts of travel planning to cultural resources on pages 4-39, 43, and 45.	No
Southern Utah Wilderness Alliance	26	26	The EIS lacks any statement of purpose and need for the ORV trail designations. How many trails designated in the plan addresses the needs of non-motorized visitors. How many trails designated in the plan are for ORVs and how many for hikers?	The purpose and need for designating travel routes are discussed. The discussion provides all the criteria utilized for identifying the routes with a purpose and need. The interdisciplinary team considered these criteria in designating routes. The specific criteria utilized were not identified route by route. The needs of non-motorized visitors have been addressed in the plan by providing for closing nearly 611,000 acres to off	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				road travel. Of the nearly 1.8 million acres of public lands only 2311 acres are proposed as open to OHV travel. There are nearly 386,027 acres (nearly 22% of the public lands) that are protected as WSAs. In addition hikers are not restricted anywhere on public lands.	
Southern Utah Wilderness Alliance	26	28	The Draft RMP should have analyzed an alternative with fewer ORV routes. 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. There are only 860 miles of difference between the travel plan mileage in Alternatives B, C, D and E. Thus the Draft RMP violates NEPA's requirement that the agency provide a reasonable range of alternatives for the public to consider, and for the agency to analyze in order to make a fully informed decision.	Alternative E provides protection for lands with wilderness characteristics by closing nearly 586,000 acres (about 32% of the public lands) to travel. Additionally, 860 miles of difference is nearly 40% reduction in number of routes. Only routes that existed at the time the WSAs were created have been included in the travel plan. But all cross country travel is restricted in WSAs. Nearly 55% of the lands are protected from ORV cross country travel and routes have been severely restricted in Alternatives B and E.	No
Southern Utah Wilderness Alliance	26	31	The commenter claims, that the Monticello Draft RMP does not fulfill the minimization criteria required by law especially pertaining to the designation of OHV routes. The Draft RMP fails to provide an alternative avoiding potential environmental effects of designating particular routes. The commenter alleges that the plan does not provide equal recreational opportunities for non-motorized opportunities. The Draft RMP fails to analyze the cumulative effects of a wide spread designation of motorized routes.	Impacts to natural and cultural resources from designation of OHV routes have been minimized by weighing purpose and need against resource conflict on a route by route basis. Alternative E provides protection for lands with wilderness characteristics by closing nearly 586,000 acres (about 32% of the public lands) to travel. Additionally, 860 miles of difference is nearly 40% reduction in number of routes. All cross country travel is restricted in WSAs. Nearly 55% of the lands are protected from ORV cross country travel and routes have been severely restricted in Alternatives B and E.	No
Southern Utah Wilderness Alliance	26	77	SUWA urges the BLM to take another look at route designation and duplicative routes.	The BLM analyzed each travel route according to its purpose and need weighed against potential resource conflicts. This process is detailed in Appendix N of the DRMP/EIS. As described in Appendix N, the BLM's travel plan formulation involved numerous meetings of an interdisciplinary team (including vegetation, soils, wildlife and cultural resource specialists). Potential resource conflicts were identified, their extent evaluated, and then weighed against purpose and need for the particular route. BLM feels that the range of	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				alternatives reasonably covers options including roads to be closed and left open under discussion. The DEIS/RMP provides five alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping. The BLM stands by its decisions in the travel plan.	
Southern Utah Wilderness Alliance	26	110	The BLM should not designate routes open to motorized use based on the existence of unproven claims under R.S. 2477.	The BLM did not designate routes based on R.S. 2477 claims as evidenced by its non-designation of many miles of routes. R.S. 2477 is an issue eliminated from analysis because it is beyond the scope of the plan. The RMP does not adjudicate, analyze, or otherwise determine the validity of claimed R.S. 2477 rights-of-way. The BLM analyzed each travel route according to its purpose and need weighed against potential resource conflicts.	No
Southern Utah Wilderness Alliance	26	111	The DRMP/EIS must make clear that any changes to the transportation plan to remove restrictions or make other changes to incorporate acknowledgement of R.S. 2477 assertions will require an amendment to the RMP and full compliance with NEPA.	Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis. Please also refer to response to comment 26-110.	No
Canyon Land Defenders	27	1	It is not clear how other wheeled vehicles, especially mountain bicycles, are governed by this policy. It is not appropriate to allow bicycles unlimited access to public lands where they can create considerable damage. We would like to see this issue explicitly addressed in the final RMP/EIS.	Section 4.3.8.9.2., Mechanized Recreational Travel states the MFO policy on mechanized use. Mechanized use would only be allowed on routes designated open for motorized use.	No
Canyon Land Defenders	27	2	Page 3-83 states that "the trail is open to OHV use" and the travel plan maps show the existing trail as open to OHVs under all alternatives. Our understanding is that the trail is	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			not currently "in existence" through the entire RA, especially the area between Butler Wash and Bluff. In the addition, there appears to be no analysis of the trail in the impact section of the EIS.	deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.	
Lynell Schalk	29	12	The DRMP notes that the BLM initially used the Utah State Office approach for developing "route data" and then "agreed that San Juan County's route inventory would serve as a baseline for route data since it was the most complete inventory." The BLM also used the county's "purpose and need" determinations for route designations. Who is managing the public's federal lands? The federal agency mandated by Congress to do so, or a local county government?	San Juan County's data was used as it was an inventory of the route footprint on the ground. At N.8. of the Travel Plan it states: "MFO began the process following the Utah BLM State Office (UTSO) approach. In the initial stages of the planning process, it was agreed that San Juan County's route inventory would serve as a baseline for route data since it was the most complete inventory for the field office area." BLM went through a verification process to determine the validity of the County data. N.8 further states: "Monticello Field Office used a sampling of the San Juan County route data to verify the validity of the [inventory]." At N.7 DEVELOPING PLANNING CRITERIA, the Travel Plan States: No regulations to either assert or recognize R.S. 2477 rights-of-way currently exist. While R.S. 2477 claims have been asserted by San Juan County, it is beyond the scope of this document to recognize or reject R.S. 2477 assertions, and this issue is not addressed further in this Travel Plan. Nothing in this document is intended to provide evidence bearing on or addressing the validity of any R.S. 2477 assertions. At such time as a decision is made of R.S. 2477 assertions, BLM will adjust travel routes accordingly, where necessary.	No
Lynell Schalk	29	22	Why isn't this county/SPEAR proposal (Recapture ATV Trail) incorporated in the DRMP where it can be given full public scrutiny rather than being piecemealed under individual EAs and under the public radar? Why is this proposed route and others being left out of the Travel Plan alternatives? This whole proposal smacks of pandering to one special	The illegal trail in the Recapture drainage did not come to light until after scoping was done for the RMP revision. It is being handled separately from the RMP revision and currently is being handled as an ongoing trespass resolution. Its settlement is outside the long term scope of the RMP revision though it will be consistent with desired travel management	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			interest/advocacy organization as well as to the county.	being developed in the RMP.	
Lynell Schalk	29	24	In the current Butler Wash "OHV play area" there is a site consisting of a series of dinosaur tracks, one of a mother and an accompanying set of prints of a baby dinosaur near the "county road." OHVs are presently running over these dinosaur tracks on a regular basis, slowly eroding them away. It is my understanding that San Juan County has refused to give the BLM permission to fence these tracks off because they are adjacent to the county road and on what the county claims to be their "right-of-way." The only way to preserve these tracks, short of fencing, is to close this area to cross-country or "open" OHV travel. If this area in Butler Wash is one of the proposed "OHV play areas," then more resource inventory needs to be done before a decision is made to sacrifice it to OHVs.	The BLM Manual at 8342.1 identifies protection requirements for OHV designation. Resources that must be considered in the designation process include cultural, historical, and archaeological. The BLM is aware of the dinosaur tracks in Butler Wash and we are moving forward to implement protection for them. At no time has the County ever refused to allow us to protect the tracks nor have we made a request to them for fencing the tracks.	No
Lynell Schalk	29	28	Bridger Jack Mesa ACEC: Under all alternatives (Reference: pg. 2-36, Vol. 1) it is unclear to the lay reader whether non-motorized/mechanized uses are allowed. The DRMP states that it is a "semi-primitive non-motorized (SPNM) ROS class." I was unable to find what the acronym SPNM means in the "Acronym Index" in Vol. 3, and I can't recall what the "recreation opportunity spectrum" includes, so short of reading throughout the entire 3 volumes, once again, I will leave this question to you. Is non-motorized/mechanized use allowed?	In the proposed plan, Bridger Jack Mesa would not be managed as an ACEC. This area in completely within the Bridger Jack Mesa WSA and would be managed according to the IMP except for the following: • Unavailable for livestock grazing, including grazing by saddle stock and pack animals allowed for access. • Unavailable for private and/or commercial use of woodland products except for the limited on-site collection of dead wood for campfires. Section 2.1.1.4.3, Wilderness Study Areas (WSAs), states that WSAs are closed to OHV use except for routes existing at the time of WSA designation, subject to user compliance and non-impairment of wilderness values. There are no designated routes in the Bridger Jack Mesa WSA so OHV use is not allowed. Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Mountain bikes would only be allowed on routes designated open for	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				motorized use. There are no designated routes within the Bridger Jack WSA so no mechanized use is allowed. Foot travel is allowed.	
Sierra Club Uncompahgre Group	30	3	We question whether the route system in Alternative C can be allowed under Executive Order 11644, which spells out criteria for ORV route designation. Those criteria direct the agency to minimize conflicts with other recreational activities. Alternative C will exacerbate ORV damage, leading to degradation of wildlife habitat as more and more ORVs travel on the closely spaced network of routes.	The purpose of the DEIS and DRMP is to take a hard look at the current situation and BLM contends that a hard look was taken using all required laws and regulations. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open. The BLM analyzed each travel route according to its purpose and need weighed against potential resource conflicts. This process is detailed in Appendix N of the DRMP/EIS. As described in Appendix N, the BLM's travel plan formulation involved numerous meetings of an interdisciplinary team (including vegetation, soils, wildlife and cultural resource specialists). Potential resource conflicts were identified, their extent evaluated, and then weighed against purpose and need for the particular route. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open under discussion.	No
Utah State Office of Education	31	7	Under the law, as laid out in Utah v. Andrus, the State of Utah and SITLA are entitled to reasonable access across the BLM's lands to all school trust lands, including those within WSAs. That right of access must be recognized in this document or the document will be in violations of the caselaw. In the Travel Management section, Under the Preferred Alternative (Alternative C), certain existing routes that provide the only physical access to school trust land sections would deemed not to be "Designated Routes", and motorized access on such lands would be terminated. Under Alternatives B and E, this problem would be magnified exponentially. The conservation alternatives show approximately 728 miles of roads marked for closure.	The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). A sentence has been added to Chapter 2, Lands and Realty, Management Common to All Action Alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79). In addition, the travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision.	Yes

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			School trust lands will be greatly affected by these road closures.		
Utah State Office of Education	31	8	The draft RMP fails to address the impact of these closures on the economic value of the affected school trust lands in either this section or its section on socioeconomic impacts of the preferred alternative. Under the Takings Clause of the United States Constitution, no road that accesses a school trust land section, within the RMP, should be closed without trustee consent. It is anticipated that SITLA would take the necessary legal action, on behalf of the beneficiary, to prevent such a closure.	The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). A sentence has been added to Chapter 2, Lands and Realty, Management Common to All Action Alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79). In addition, the travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision.	Yes
Utah State Office of Education	31	9	The Draft RMP should be amended to specifically state that: (1) Continued motorized administrative assess on "non-designated" routes providing access to school trust lands will be permitted to the State of Utah, SITLA, and its pemitees and grantees, notwithstanding any closure to the general public; (2) The State of Utah, SITLA, and its pemitees and grantees may undertake reasonable maintenance activities to preserve and improve existing access across the BLM lands, after consultation and appropriate environmental review by the BLM; and (3) Existing routes that are the sole access to school trust lands will not be reclaimed without full BLM consultation with, written approval by SITLA, and fair market compensation to the trust after consultation with the State Board of Education and its designated representatives.	The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). A sentence has been added to Chapter 2, Lands and Realty, Management Common to All Action Alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79). In addition, the travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision.	Yes
Howard County Bird Club	40	1	We believe Alternative C would violate Executive Order 11644 and the BLM regulations implementing it. The Executive Order directs BLM to locate ORV trails "to minimize damage to soil, watershed, vegetation, or other resources of the public lands" and "to minimize harassment of wildlife or significant disruption of wildlife habitats." It also requires managers to "minimize conflicts between off-road vehicle use and other existing or proposed recreational	The BLM worked with an interdisciplinary team of resource specialists, to develop the alternatives for the Travel Plan in the DRMP/DEIS. The ID team reviewed each route for purpose and need weighed against resource conflicts. These conflicts are identified route by route in the GIS data developed for the Travel Plan which is available in the administrative record. The impacts identified for travel management in the DRMP/DEIS are derived from this data.	No

TRV – Travel Management					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			uses…" Alternative C does just the opposite, promoting those impacts and conflicts by approving ORV traffic through important wildlife habitat, riparian areas, and lands that have wilderness characteristics.		
Broads Healthy Lands	41	3	The travel management component of this DRMP fails to meet the requirements of NEPA, APA, the Information Quality Act (IQA)(also known as the Data Quality Act), and legal requirements for recognizing state or county highway or road claims. The use of county road inventories for planning purposes is beyond the scope of this DRMP and is inadequately analyzed and justified by the DRMP.	Cooperating agency status was extended to Federal, State, and local agencies, including San Juan County. They were a formal cooperating agency in the RMP revision process. San Juan County's route data was used as it was an inventory of the route footprint on the ground. At N.8. of the Travel Plan it states: "MFO began the process following the Utah BLM State Office (UTSO) approach. In the initial stages of the planning process, it was agreed that San Juan County's route inventory would serve as a baseline for route data since it was the most complete inventory for the field office area." BLM went through a verification process to determine the validity of the County data. N.8 further states: "Monticello Field Office used a sampling of the San Juan County route data to verify the validity of the [inventory]."	No
Broads Healthy Lands	41	4	Because the DRMP makes only cursory, vague and unsupported statements concerning travel management, it fails to meet the requirements of NEPA, any decisions resulting from this would be arbitrary and capricious. For this reason it would also fail to meet the requirements of the APA.	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 effects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives.	No
Broads Healthy Lands	41	5	As a part of properly re-issuing the travel management plan (TMP), the BLM must conduct route by route NEPA analysis in order to justify adding routes to the system. Routes must be planned and designed by type of use and must consider and mitigate cultural resource damage, user conflict, erosion and noxious weed issues while avoiding riparian areas.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Broads Healthy Lands	41	6	The BLM must take responsibility for management of its transportation system in order to administer its programs, provide for recreation and meet its resource goals. To turn this responsibility over to San Juan County is not only irresponsible, it is a potential violation of the Supremacy Clause. The confusion over "county roads" and "BLM system roads" must be clarified in the final RMP and TMP. Again, the MFO must claim responsibility for its road system in the FEIS.	Please refer to response to comment 41-3.	No
Broads Healthy Lands	41	7	Section N.7 of the DRMP states: "R.S. 2477 -No regulations to either assert or recognize R.S. 2477 rights-of-way currently exist. While R.S. 2477 claims have been asserted by San Juan County, it is beyond the scope of this document to recognize or reject R.S. 2477 assertions, and this issue is not addressed further in this Travel Plan. Nothing in this document is intended to provide evidence bearing on or addressing the validity of any R.S. 2477 assertions. If this is in fact the case, BLM must construct its own GIS layer not based on county claims, and routes and linear features on all lands not under the jurisdiction of the BLM must be excised from the GIS and any resulting maps made by the agency.	Please refer to response to comment 41-3.	No
Broads Healthy Lands	41	9	The MFO fails to provide any reason for including the state and county road claims on the travel maps in the DRMP. It fails to indicate that the information is accurate, reliable and unbiased. Since the state and counties in Utah have repeatedly made adverse claims for roads against the United States, it is entirely unlikely that the information provided would be unbiased.	Please refer to response to comment 41-3.	No
Broads Healthy Lands	41	10	If the Monticello Field Office is asserting these road claims are valid, then it is acting contrary to the direction of Congress. If it is asserting these road claims are valid under	Please refer to response to comment 41-3 and 41-7.	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			FLPMA then it should be able to show the Title V authority for these claims. Again, the nature of accepting these claims reaches far beyond any procedure the BLM has conceived for making even non-binding determinations. Either the BLM is acknowledging R.S. 2477 ROW claims, or it is recognizing Title V ROW claims. Neither of these is permissible with the information given in the RMP. Both would be illegal under the information given.		
Broads Healthy Lands	41	11	Section N.9.4.1 discusses potential conflict identification by area, but it totally neglects to mention sport climbing in the Indian Creek area as use/resource conflict with off-roading. In fact, there is no reference whatsoever in the DRMP/DEIS to the existing conflict between noisy and impactful off-roading and quiet, muscle-powered rock climbing in the Indian Creek area. For this reason, BLM is out of compliance with point (3) of Executive Order 11644, "Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands."	A range of management actions was developed to address the issues identified by the public during scoping. The BLM did give full consideration to the concept that a desirable BLM Travel Plan contains an equitable allocation between non-motorized and motorized recreation. 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.	No
Broads Healthy Lands	41	13	In the maps provided with the printed and digital versions of the DRMP, no meaningful information is provided to the public regarding the travel plan/route system. Proposed TMP maps do not distinguish between State Highways, improved County Roads and County claimed dirt paths that were never constructed or maintained by anyone. Hiking and other non-motorized trails are not shown. The type of use of each route is not indicated. One cannot distinguish if a route is designated for standard passenger vehicles, high clearance 4X4s, ATVs, UTVs, rock crawlers or dirt bikes. Nowhere is	In the final RMP, designated OHV routes will be portrayed by a map entitled "Field Office Travel Plan and Map". This map is then the basis for route signing and enforcement. The field office will prioritize actions, resources, and geographic areas for implementation. The implementation goals include completing signage, maps, public information, kiosks, and working with partners. The placement of signs, kiosks, informing and educating the	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			there information on how many miles of each type of route are being proposed for each alternative. There is merely a summary of total route miles, many of which must not be designated for motorized travel by the BLM. This situation must be remedied in the final RMP and final TMP by actually conducting comprehensive travel and transportation planning that considers cumulative impacts for all kinds of recreation use.	public recreation users will be implemented after the signing of the RMP and will not be decided in the RMP DEIS. The implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and funding, etc.	
Broads Healthy Lands	41	14	In section after section, there is no mention made of the management and maintenance needs or signing needs of the non-motorized trail system. More telling is the fact that none of the maps for the Travel Plan alternatives show any designated or constructed foot trails. This makes it very nearly impossible to analyze how proposed motorized routes might impact the experience of hikers, horsemen and other traditional land users.	Please refer to response to comment 41-13. In addition, a range of management actions was developed to address the issues identified by the public during scoping. The BLM did give full consideration to the concept that a desirable BLM Travel Plan contains an equitable allocation between non-motorized and motorized recreation. 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.	No
Broads Healthy Lands	41	16	AS early as 2005, a radical anti-environment ATV club, San Juan Public Entry and Access Rights (SPEAR), provided a 535 mile loop and spur proposal to the BLM for such an ATV route system. This system should have been, at a minimum, made public during the RMP/TMP process and the effects of such a system considered in such a way that the cumulative impacts are identified and analyzed. This grievous error must	In MFO ID team discussions regarding the travel plan, this issue was identified as a possible conflict as there was some talk of such a proposal. However, no such formal proposal was ever received by the MFO.	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			be corrected in the final RMP and TMP.		
Broads Healthy Lands	41	26	There is no recommendation found in the DRMP that all routes should be located outside of riparian areas. This is a BLM/FLPMA requirement. In the Purpose and Need section, P.7.2.1, there is a list of criteria to be considered for routes. Riparian areas are not included in this list of criteria to determine appropriateness of routes. This is a glaring omission, and must be corrected as a part of the final RMP and TMP.	The BLM utilized 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 (Appendix R of the DRMP/DEIS). On pg. R-2, 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".	No
Canyon Country Heritage	43	5	The DRMP sates both the RAC and the BLM's WO have recommended that there is a need for increased law enforcement rangers to "ensure compliance with motorized OHV regulations" (Volume 2, Appendix N, page N-35) Under the previous field manager, the number of rangers was cut in half, leaving one ranger to patrol the entire MFO or approximately 1.8 million acres of public land. Will the BLM be replacing the lost position so that this plan can be more effectively implemented?	This action is specifically addressed in Chapter 1 of the DRMP/DEIS (pg. 1-11), where "education, enforcement/prosecution, vandalism and volunteer coordination are listed as issues that are addressed through policy or administrative actions. Staffing levels are not part of the RMP revision process nor could they be for a plan expected to span a 10 to 15 year period. They are not addressed at a land use planning level but are addressed administratively based on annual budgets.	No
Canyon Land Defenders	47	1	We strongly support the Draft RMP proposal to limit OHV travel to designated roads and trails in much of the resource area. This is a considerable improvement over the existing RMP. It is not clear how other wheeled vehicles, especially mountain bicycles, are governed by this policy. It is not appropriate to allow bicycles unlimited access to public lands where they can create considerable damage. We would like to see this issue explicitly addressed in the final RMP/EIS.	Section 4.3.8.9.2., Mechanized Recreational Travel states the MFO policy on mechanized use. Mechanized use would only be allowed on routes designated open for motorized use. Mountain bikes are restricted to designated routes within the DRMP/EIS. The BLM uses the term "mechanized" to distinguish those routes that are open to mountain bike use, but not to motorized use. This term is used in the National Mountain Bike Strategy.	No
Bluff Landowners Coalition	48	1	Each of the five alternative Travel Plan maps list two "Historic Trails," the Hole-in-the-Rock Trail and the Spanish Trail, under the title of "OHV and Travel Plan" (Reference Maps 49, 50, 51, 52, and 53). These trails are designated as	It is confusing that the two historic trails are shown in their entirety on the OHV and travel plan maps. But, the intent is not to imply that they are open to vehicular use in their entirety. Portions of the trails are open to vehicle use. Some	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			open to OHVs on each of the Travel Plan maps. We are concerned that the DRMP depicts the Hole-in-the-Rock Trail leading directly into the town of Bluff. There is no evidence on the ground that the trail still exists between Butler Wash and Bluff.	long established, major roads lie atop portions of the old trail systems. The entire historic trails are not open to vehicular use. The references quoted from Chapter 3 – Affected Environment state the current situation not the proposed. The term "Hole in the Rock Trail" has two different meanings. It can refer to the entire pioneer trail – some of which is unknown on the ground. It also refers to the known segment which accesses the actual "Hole in the Rock". The two reference can be confusing. The access trail does get intense legitimate use.	
The Nature Conservancy	49	19	The USFS manages Arch and Texas Canyons as a roadless area. Consistent use and management prescriptions with adjoining land management agencies are preferable.	In addition to the cooperating agencies, the BLM Monticello Field Office held meetings with and sought the input of other agencies that have land management jurisdiction within or adjacent to the planning area. Consistent management with adjoining land management agencies may be preferable in some but not all cases. In the Arch Canyon situation, the road ends near the USFS boundary and topography precludes continuation of most motorized travel beyond the existing road. Therefore, consistency of management is not an issue in this instance.	No
Western Watershed Project, Inc	50	3	Insufficient detail and analysis is provided in the DEIS/RMP with regard to proposed motorized routes within riparian floodplains, and it is impossible to discern the types of route designations/limitations from the travel maps presented within the DEIS/RMP due to poor presentation (indiscernible coloring of routes). Additional data and analysis of motorized routes is requested to identify motorized proposals and impacts associated with each riparian ecosystem to include:	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. The BLM utilized 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	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			-- the type of motorized route (B or D routes) located within the 330' protective riparian buffer, -- the acres/miles of motorized routes and number of crossings within each riparian area, -- the drainage name, watershed and current condition of each affected riparian area. This additional riparian data should be specifically identified by riparian area, as similarly presented in Appendix N, Table N.9.4.4.3	camping on riparian areas (Appendix R of the DRMP/DEIS). On pg. R-2, 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."	
BlueRibbin Coalition	54	2	Regarding Management Common to All Resources, Chapter 2 page 2-7: Designated routes can be categorized as mechanized only (bicycles), single tract motorized (dirt bikes), two track motorized (4-wheelers, jeeps), available to all vehicles, or any combination of these categories. Are there any mechanized only routes in any of the Alternatives? Also, why isn't the Monticello BLM using the Road, Primitive Road, Trail paradigm developed by the agency?	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. There are no mechanized routes only in the RMP. Mechanized use would be restricted to routes approved for motorized use. Also, as a matter of clarification, the UUD is a management standard that the BLM applies to third party public land users. The terms "road", "primitive road" and "trail" are attributes of the BLM's Facilities Asset Management System, and are not applicable to route designation.	No
BlueRibbin Coalition	54	4	Regarding Travel Management, Management Common to All Action Alternatives	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,	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Designated routes would be categorized as mechanized only (bicycles), single-track motorized (dirt bikes), or two-track motorized (4-wheelers, jeeps), or available to all vehicles, or any combination of these categories. Adjustments of these categories would be made based on recreational demand and potential conflict. The impacts of these adjustments would be analyzed and disclosed at the activity planning level. All non-motorized travel would be allowed on designated routes unless otherwise prohibited. OHV and mechanized travel would be allowed on some routes unless otherwise designated. Chapter 2, page 2-54 It's not clear if there are any bicycle trails designated in the Travel Plan.	that there would be conflicting uses and impacts on the public land. Section 4.3.8.9.2., Mechanized Recreational Travel (Mountain Bikes) states the MFO policy on mechanized use. Mountain bikes would only be allowed on routes designated open for motorized use.	
ECOS Consulting	58	22	4.3.13.2.4. Impacts of Recreation Decisions Common To All Alternatives Page 4-361, 3rd Paragraph: This is not an analysis of direct, indirect, or cumulative impacts. It is simply stating that the BLM will follow certain policies that it has not effectively followed in the past. The BLM must analyze the direct and indirect impacts of designated OHV routes and OHV use on soils and water. The increased erosion, water pollution, and destruction or riparian areas are just a few of the impacts of OHV routes and OHV use. NEPA requires an analysis of these impacts, recommended solutions, and mitigation plans, not promises that things will get better.	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.	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
ECOS Consulting	58	27	4.3.17.2.13 Impacts of Travel Decisions on Vegetation Page 4-529, 3rd Paragraph: Here it is stated: "There are a total of 1,940,740 acres open to OHV use under this alternative, which is more than under any of the other alternatives." How can this many acres be open to OHV use if there is only about 1,800,000 acres within the Monticello Planning Area?	This is a mistake in the document and has been changed. Under alternative A there are 611,310 acres open to cross country travel by OHVs. The remaining 1,171,813 acres is either closed to OHV use or open with restrictions.	Yes
EOG Resources	60	31	The BLM proposes to close various "B-Class" and "D-Class" roads under each of the alternatives. See Monticello DRMP/EIS, pg 2-56, Table 2.1. The BLM has not, however, provided any maps of the roads to be closed. Without this information, EOG cannot determine how road closures would impact oil and gas development in the Monticello RA. The BLM must include maps of road closures in the final Monticello RMP/EIS.	"B" and “D” routes do not equate to a County road assertion. The routes identified as "B" or “D” routes in the DRMP/DEIS are roads located on public lands and managed by the BLM until properly adjudicated. The DRMP/DEIS proposes four different alternatives to manage these routes.	No
EOG Resources	60	54	The BLM proposes to close various "B-Class" and "D-Class" roads under each of the alternatives. See Monticello DRMP/EIS, pgs. 4-479 - 4-480. The BLM has not, however, provided any maps of the roads to be closed or, at least, the areas in which these road closures would occur. Without this information, EOG cannot determine how road closures would impact oil and gas development. The BLM must include maps of road closures in the final Monticello RMP/EIS.	"B" and “D” routes do not equate to a County road assertion. The routes identified as "B" or “D” routes in the DRMP/DEIS are roads located on public lands and managed by the BLM until properly adjudicated. The DRMP/DEIS proposes four different alternatives to manage these routes. As specified in the Draft RMP/DEIS, 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.	No
CrownQuest	62	50	The BLM proposes to close various "B-Class" and "D-Class" roads under each of the alternatives. See Monticello DRMP/EIS, pg, 2-56, Table 2.1. The BLM has not, however,	"B" and “D” routes do not equate to a County road assertion. The routes identified as "B" or “D” routes in the DRMP/DEIS are roads located on public lands and managed by the BLM	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			provided any maps of the roads to be closed. Without this information, CrownQuest cannot determine how road closures would impact its operations. The BLM must include maps of road closures in the final Monticello RMP/EIS.	until properly adjudicated. The proposed plan does not close any B roads. During the planning process BLM resource specialists and the San Juan County planner reviewed each route for purpose and need. Those that were redundant, served only a one time purpose (for example old seismic exploration routes), or were restricted by law (such as intrusions into Wilderness Study Areas) were not to be carried forward for designation in the travel plan. Some routes were deemed to be needed for administrative purposes but not for use by the general public. These would be routes going to stock ponds, guzzlers or even oil and gas facilities. Though these are not included for designation in the travel plan, they are available for use for administrative purposes. The proposed travel plan map will include both routes BLM wants to designate, but also routes to be closed.	
CrownQuest	62	90	The BLM proposes to close various "B-Class": and "D-Class" roads under each of the alternatives. See Monticello DRMP/EIS, pgs. 4-479 - 4-480. The BLM has not, however, provided any maps of the roads to be closed or at least, the areas in which these road closures would occur. Without this information, CrownQuest cannot determine how road closures would impact its operations. The BLM must include maps of road closures in the final Monticello RMP/EIS.	"B" and “D” routes do not equate to a County road assertion. The routes identified as "B" or “D” routes in the DRMP/DEIS are roads located on public lands and managed by the BLM until properly adjudicated. The DRMP/DEIS proposes four different alternatives to manage these routes. As specified in the Draft RMP/DEIS 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.	No
Chris Brannan	108	1	The road map presented in the DRMP is inadequate to properly study the changes that are suggested in the various alternatives. All it shows is, apparently, existing roads and trails; it does not distinguish them by size; and the scale does not allow adequate analysis.	It is difficult to represent the nearly 5 million acres of the Monticello Field Office area in a standard size publication. At each of the public meetings larger maps were provided for many of the alternatives, including the travel plan alternatives. PDF versions of the travel plan maps were available on-line which would provide a better opportunity for detailed analysis.	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
William Hughes	123	1	The road map presented in the DRMP is inadequate to properly study the changes that are suggested in the various alternatives. All it shows is, apparently, existing roads and trails; it does not distinguish them by size; and the scale does not allow adequate analysis.	It is difficult to represent the nearly 5 million acres of the Monticello Field Office area in a standard size publication. At each of the public meetings larger maps were provided for many of the alternatives, including the travel plan alternatives. PDF versions of the Travel Plan maps were available on-line which would provide a better opportunity for detailed analysis.	No
Robert Telepak	128	1	Put most simply, the OHV travel plan maps on your website of the various Alternatives are woefully inadequate. They are too low resolution and important road areas are obscured by legends naming various areas.	It is difficult to represent the nearly 5 million acres of the Monticello Field Office area in a standard size publication. At each of the public meetings larger maps were provided for many of the alternatives, including the travel plan alternatives.	No
Veronica Egan	131	1	It is impossible for the public to adequately view or assess the current or proposed status of the travel system on Monticello BLM lands without access to accurate maps. If these documents cannot be produced as stated in the DRMP, please extend the comment period until they can be provided and then allow another 14 days for the public to examine them and develop comments accordingly.	It is difficult to represent the nearly 5 million acres of the Monticello Field Office area in a standard size publication. At each of the public meetings larger maps were provided for many of the alternatives, including the travel plan alternatives.	No
Veronica Egan	131	3	Remove the Hole in the Rock Trail from all maps depicting routes open to motorized use. The entire trail is listed on the National Historic Register, and as such must be protected from the damage inflicted by motorized use. The presence of this trail on these maps gives the false impression that it is open to motorized use.	It is confusing that the historic trail is shown in its entirety on the OHV and travel plan maps. But, the intent is not to imply that it is open to vehicular use in its entirety. Portions of the trails are open to vehicle use. Some long established, major roads lie atop portions of the old trail system. The entire historic trail is not open to vehicular use. It has been deleted from the OHV/Travel Plan maps in the FEIS.	Yes
Veronica Egan	131	4	Clarify (NPS, USFS) agency boundaries on all maps and determine if the routes that BLM has specified as open are open on these agencies lands, or not, before placing them on BLM maps.	The roads in lands administered by the Park Service and Forest Service have been removed from the OHV and travel plan maps. BLM is dealing with routes on their lands only. Both NPS and FS have had opportunity to review BLM's travel plan designations.	Yes
Jim Robinson	194	1	Reduce ORV routes to a network that minimizes impacts on	The purpose of the DEIS and DRMP is to take a hard look at	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			natural, cultural and wilderness resources and minimizes conflicts with other public uses of the land. There is no demonstrated purpose or need for many of the routes in Alternative C. They should be closed and restored to nature.	the current situation and BLM contends that a hard look was taken using all required laws and regulations. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open.	
Jan Kobialka	196	1	The ORV routes in Alternative C do not minimize impacts on wilderness and wildlife values, as you are required to do by BLM regulations at 43 CFR 8342.1. Alternative C would allow ORVs to roar through most of the proposed wilderness areas on some 400 miles of trails, jeopardizing their wilderness values and degrading riparian habitat. The final plan should bar ORVs as in Alternative E. That would be a minor deletion from the 1,900 miles of ORV routes you have proposed, but a big gain for wildlife and wilderness.	A range of ORV restrictions were spread across alternatives including Alternative E, which protected nearly 580,360 acres. Management was consistent with the goals and objectives of the different alternatives.	No
Glenn Gurney	205	1	Against any existing roads that have been used to support motorized licensed vehicles. Operation of any motorized vehicle off established roads be banned.	A range of ORV restrictions were spread across alternatives. Management was consistent with the goals and objectives of the different alternatives. The purpose of the DEIS and DRMP is to take a hard look at the current situation and BLM contends that a hard look was taken using all required laws and regulations. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open.	No
Glen Gurney	205	2	The entire proposed BLM action is flawed and unusable because the BLM has not defined OFF HIGHWAY VEHICLE. Under all the current proposals, a school bus traveling down one of the designated roads would be considered an OFF HIGHWAY VEHICLE. The proposed BLM action cannot proceed unless the OHV term is clearly defined.	From the Travel Plan - Appendix N: The term off-highway vehicle (OHV) refers to – "any motorized vehicle capable of, or designated for, travel on or immediately over land, water, or other natural terrain," as defined in the National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, finalized by the Bureau of Land Management (BLM) in January 2001. ATTACHMENT B: DEFINITIONS All-Terrain Vehicle (ATV) – A wheeled or tracked vehicle, other than a snowmobile or work	No

TRV – Travel Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				vehicle, designed primarily for recreational use of the transportation of property or equipment exclusively on undeveloped road rights of way, marshland, open country or other unprepared surfaces (BLM, National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, January 2001).	
San Juan Public Entry and Access Rights	206	1	County D Road from Red Canyon County B road to Chocolate Drop and Blue Canyon--this road was not shown on the Alternative C map. It was not shown on the "Roads Closed" Alternative C map. I would hope that this is just an error in the production of said maps.	This portion of the route is not designated in the plan due to an archaeological site within the route. BLM would make future route adjustments based on access needs, recreational opportunities, and resource constraints. These activities would be analyzed at the site-specific activity planning level.	No
Utah 4 Wheel Drive Association	217	2	The U4WDA assessment notes that there are several significant routes left out of the DEIS/DRMP. I understand that the U4WDA has brought these routes to the BLM's attention and so I support their inclusion as legal, open motorized routes. These routes are: B107, B250, D0010, D0011, D0012, D0013, D0023, D0042, D0044, D0057, D0059, D0060, D0177, D0210, D0211, D0212, D0244, D0246, D0575, D1918, D1921, D2037, D2117, D2153, D3486, D3487, D3522, D3983, D4668, D4779.	The range of options across all five alternatives includes some of the options you list. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open. There is no forgone conclusion that any one alternative or even portions of alternatives will be those chosen for the preferred alternative Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.	No
Mary Meloy	220	1	It seems to me that the proposed Monticello RMP has taken the route maps of the OHV community and adopted them as designated routes in the plan as trade-off to get users to stay on trails. This reactive and political and probably illegal, since many of the two tracks and trails used as designated routes bring motor vehicles in contact with archaeological ruins.	A range of ORV restrictions were spread across alternatives. Management was consistent with the goals and objectives of the different alternatives. The purpose of the DEIS and DRMP is to take a hard look at the current situation and BLM contends that a hard look was taken using all required laws and regulations. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open.	No

TRV – Travel Management					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Glen Canyon Group, Utah Chapter, Sierra Club	221	5	Regarding Table ES1 (page ES-5) OHV Categories (acres) by Alternative: How can the total of acres under the No Action Alternative A be over 2.2 million acres when less that 1.8 million acres is managed by BLM? Adding footnote 3 under Summary Table A on page 2-3 would clarify the matter.	Changes have been made to the document as noted.	Yes
Glen Canyon Group, Utah Chapter, Sierra Club	221	6	Summary Table A on page 2-3 should note that the "Miles of Routes Designated" are D roads only. The totals for Alternatives C and D are incorrect.	Changes have been made to the document as noted.	Yes
Glen Canyon Institute	222	6	The DRMP fails to consider a reasonable range of alternative Travel Management alternatives - contrary to the mandate of the National Environmental Policy Act (NEPA). Even Alternative E, which closes the most ORV routes of any alternative, includes only a small reduction in the vast motorized route network. Changes Needed in the Final Resource Management Plan 1. Reduce dramatically the number of motorized ORV routs, especially in areas that have important natural values and occurrence of listed species. Even reducing the current motorized route mileage in half would leave more than 1,000 miles of roads - far too many to ensure the integrity of the area or to be managed and controlled by the limited BLM staff.	A range of ORV restrictions were spread across alternatives. Management was consistent with the goals and objectives of the different alternatives. The purpose of the DEIS and DRMP is to take a hard look at the current situation and BLM contends that a hard look was taken using all required laws and regulations. BLM feels that the range of alternatives reasonably covers options including roads to be closed and left open.	No
Form Letter 3	FL3	1	I oppose the BLM's plan to issue permits for off-road vehicle use in Arch Canyon, a culturally rich area that is not suited to this type of activity. Thousands of miles of dirt roads and trails in southeastern Utah already offer ample opportunities for various types of off-road vehicle use.	Permitting vehicles within Arch Canyon is not within the scope of the Land Use Plan. The commenter's preference for closing the Arch Canyon route is noted.	No

TRV – Travel Management				
Commenter Name	**Record ID & Comment Number**	**Comment Text**	**Response to Comment**	**Doc Mod**
		An independent archaeologist who conducted limited surveys and fieldwork in Arch Canyon estimates that there are more than one hundred undocumented cultural sites in the area, many of which could be severely impacted by increased motorized vehicle use. Vehicles could potentially cross the canyon's stream as many as 120 times within a short roundtrip of the canyon -- stirring up sediment, dripping oil and other fluids, altering stream banks and tearing out native vegetation along the way. Allowing this type of activity without knowing its impacts is simply irresponsible. I urge the BLM to fully analyze the direct, indirect and cumulative impacts of off-road vehicle use on the cultural and natural values of Arch Canyon before making a final decision.		

VEG – Vegetation					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
U.S. Fish and Wildlife Service	2	18	Page 3-155 in Table 3.57. The title suggests cover types in all of the Monticello Planning Area, but they are actually only of the lands administered by the BLM.	The title of Table 3.57 has been changed from the Monticello PA to BLM lands.	Yes
U.S. Fish and Wildlife Service	2	24	Page 4-421 in section 4.3.15.1. In the third paragraph it states "A diverse native community would have the potential to establish...." This statement assumes that natives will successfully reestablish. The document should thoroughly describe the difficulties with nonnative, invasive plant species following surface disturbances that include fire.	This section has been revised to incorporate impacts of non-native, invasive plant species following surface disturbances that include fire.	Yes
National Park Service Intermountain Region	3	14	There seems to be a discrepancy between how many livestock AUMs are on the current permit for the Lake Canyon Grazing Allotment and what is defined in the Monticello Field Office DRMP/DEIS (Appendix 8-A) and the 1999 Glen Canyon NRA Grazing Management Plan.	BLM will review the discrepancy in the various planning documents identified by the commenter and will make changes in the documents as necessary. Any changes in AUMs will be handled administratively between the two agencies as needed. These discrepancies would not affect the BLM's proposed plan or alternatives and its impact analysis.	No
State of Utah	4	94	The UDWR believes that desirable non-native plants should never be categorically excluded from use on western rangelands and encourages BLM not to exclude use of non-native plants in the Monticello RMP.	On pg. 3-159 it states “for revegetation purposes, the use and perpetuation of native species is a priority, except for instances when non-intrusive, non-native species are more ecologically or economically feasible.” This policy under the Draft EIS / RMP allows use of non-native plant species where deemed appropriate on a site specific basis.	No
National Park Service Intermountain Region	3	14	There seems to be a discrepancy between how many livestock AUMs are on the current permit for the Lake Canyon Grazing Allotment and what is defined in the Monticello Field Office DRMP/DEIS (Appendix 8-A) and the 1999 Glen Canyon NRA Grazing Management Plan.	BLM will review the discrepancy in the various planning documents identified by the commenter and will make changes in the documents as necessary. Any changes in AUMs will be handled administratively between the two agencies as needed. These discrepancies would not affect the BLM's proposed plan or alternatives and its impact analysis.	No

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
San Juan County	7	54	Pg. 2-57 - The first goal under vegetation should include livestock as well.	The document has been revised to include vegetative goals in relation to livestock management.	Yes
Southern Utah Wilderness Alliance	26	12	Existing conditions should include the presence of non-native species like cheatgrass. Numerous studies are readily available on this subject and should have been described by the BLM or used as the basis for a description of the manner in which roads and ORVs spread weeds and contribute to wildfire.	Table 3.58 lists noxious and invasive species found in the Monticello FO and cheatgrass is listed in this table. Complete inventories of noxious weeds are not available across the planning area. Within the action alternatives, travel is limited to designated routes and open cross country travel is essentially eliminated. Therefore, the potential for the spread of noxious weeds by OHV use is substantially reduced. Also see Appendix G.	No
Southern Utah Wilderness Alliance	26	14	Existing conditions should include an explanation of how ORV use spreads non-natives which out compete native plants and how ORVs crush native vegetation.	Table 3.58 lists noxious and invasive species found in the Monticello FO. Complete inventories of noxious weeds are not available across the planning area. Within the action alternatives travel is limited to designated routes and open cross country travel is essentially eliminated. Therefore, the potential for the non-native species by OHV use is substantially reduced. Also see Appendix G. The DRMP/EIS discusses the impacts of ORV use on vegetation starting on p. 4-528.	No
Southern Utah Wilderness Alliance	26	20	ORV impacts to vegetation are largely ignored. For example, Chapter 4's discussion of this appears to be limited to two paragraphs, none of which is quantitative and none of which assess the probability of ORVs introducing and facilitating the spread of non-native species. The commenter states that 2,311 acres would be more likely to have impacts occur because they are left open to cross country travel.	NEPA analysis for a landscape level document such as a land use plan analysis is done at a qualitative level and site specific quantitative analysis is not possible or practical. Chapter 4 analysis acknowledges that cross county OHV use can spread noxious weeds and can crush vegetation. This qualitative level of analysis is sufficient. However, where appropriate, specific details are discussed. For example, the impacts to the 2,311 acres to be open for OHV use are discussed on page 4-531.	No
Southern Utah Wilderness Alliance	26	25	The plan provides for high levels of both grazing and ORV use in canyon bottoms where riparian areas and cultural sites are also prevalent. The BLM should identify the areas	Limiting grazing in riparian areas is considered on a case by case basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management. Restricting cattle in	No

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			in which ORV use is permitted and discuss the combined effects of grazing and ORVs on these riparian areas.	riparian areas is not directly related to OHVs. It is possible to restrict OHVs to designated routes, which minimizes impacts to riparian areas; however, cattle can not be limited in this fashion.	
The Nature Conservancy	49	5	The DRMP does not appear to contain a commitment to sustaining "health" of coarser-scale ecological systems, at least in principle. However, we recommend that such language be improved by adding the following points: --Within Goals and Objectives for Vegetation (page 2-57) is a statement to "Manage vegetation resources for desired future conditions (DFC) ensuring ecological diversity, stability, and sustainability, including the desired mix of vegetation types, structural stages, and landscape/riparian function…" Though this bullet point is good, it would be worthwhile to repeat the commitment to utilize quantitative and qualitative monitoring techniques as per Interpreting Indicators of Rangeland Health (technical reference 1734-6-2005) and Monitoring Manual for Grassland, Shrubland and Savanna Ecosystems; Volumes I and II to evaluate vegetation condition, under Management Common to All Alternatives for Vegetation, because uses other than grazing affect vegetation and DFC is undefined.	The DRMP does contain a commitment to sustaining long-term public land health at a landscape ecological scale. The Livestock section of the DRMP references that "grazing will be managed according to Standards for Rangeland Health and Guidelines for Livestock Grazing Management" is a direct reference to BLM's adoption of these standards and guidelines, which encompass the referenced "Interpreting Indicators of Rangeland Health" (technical reference 1734-6). These indicators of rangeland health also analyze other uses potentially affecting vegetation, yet for brevity's sake they are not repeated throughout the document. Also, It is BLM policy to monitor existing use levels, forage utilization, and the vegetative trend of resource conditions 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 as the other objectives of the RMP.	No
The Nature Conservancy	49	20	The statement that Upland areas would be managed for "desired future condition" is vague because no specific DFC is defined. The glossary defines desired condition as "Description of those factors, which should exist within ecosystems both to maintain their survival and to meet social and economic needs." However, desired condition to depends upon personal use or requirements. For example, desired future condition for a rancher may differ vastly from desired condition for mineral exploration or wildlife. Therefore a better management prescription would be to	The definition in the Vegetation section for desired future condition (DFC) has been clarified to "Manage vegetation resources for desired future conditions, as determined by site-specific BLM objectives and rangeland functionality and health, thereby ensuring ecological diversity, stability, and sustainability, including the desired mix of vegetation types, structural stages, and landscape/riparian/watershed function, and provide for native plant, fish, and wildlife habitats." Therefore, DFC is determined by the BLM utilizing Ecological Site Descriptions and managed to meet ecological process	Yes

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			mange according to Interpreting Indicators or Rangeland Health (technical reference 1734-6 2005) and, when appropriate, the complimentary manuals Monitoring Manual for Grassland, Shrubland and Savanna; Volume I and II to determine if goals and objectives are being met. (Page 2-57).	and sustain and/or improve rangeland health. The resources of concern identified by the commenter related to livestock grazing do not require a land use planning decision. These resource values are addressed on a site specific allotment basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management.	
ECOS Consulting	58	5	After examining the BLM's Monticello DRMP/EIS, it is startling to find very little mention of "ecosystem management", especially in the wildlife and fisheries sections. According to this plan, management of the Monticello Planning Area is to proceed pretty much as it has in the past 30-70 years: reactive, with very little room for new techniques, ideas, or "ecosystem management". The BLM's own publication "Ecosystem Management in the BLM: from Concept to Commitment. (USDI BLM 1994)", describes the principles and philosophical framework for ecosystem management approaches. Essentially, the BLM defines nine "operating principles" to the ecosystem approach: 1) Sustainable ecosystems: Sustain the productivity and diversity of ecosystems and provide for human values, products and services; 2) Future Landscape Functions: Determine desired future landscape functions based on historic, ecological, economic, and social considerations; 3) Partnerships: Involve the public and coordinate with other land owners - Federal, State, and private. 4) Science in Decision Making: Use scientific information for decision making; emphasize research and rapid technology transfer; 5) Date Leads to Knowledge: Organize and integrate effective data and data gathering systems to insure date is used to enhance knowledge (i.e. inventory, monitoring automation, etc.); 6) Internal Integrated Approach: Use and interdisciplinary, integrated approach to land management; 7) Thinking Big and Thinking Small: Expand thinking to	BLM manages on a dynamic landscape scale, which incorporates a multitude of ecosystems throughout the Monticello Field Office. BLM current emphasis is ecosystem analysis at a watershed scale. The principles of "Ecosystem Management in the BLM: from Concept to Commitment (USDI BLM 1994)" are valid and incorporated into current BLM adaptive management principles, such as Standards for Public Land Health that includes Interpreting Indicators of Rangeland Health (technical reference 1734-6). Managed ecosystems are further refined into ecological sites, which the BLM incorporates into its public land health monitoring programs. The RMP is a broad scale ecosystem document that defines management limits and restrictions to various users and further development of public lands. BLM strategizes and manages various uses that may potentially impact resource conditions within multiple landscapes to ensure impacts are not significant and that the Standards for Public Land Health are met and sustained. Natural processes of the landscape are an integral part of BLM's commitment to ensure ecological functionality, such as in riparian systems or upland plant communities. BLM continually gathers various monitoring data and ecological condition assessments throughout various ecosystems, and incorporates its findings into a variety of land management decisions.	No

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			higher, longer-term levels (temporal and /Spatial); 8) Connecting the Landscape: Think in terms of relationships such as headwaters to downstream, above ground to below ground, up slope to down slope; and 9) Monitoring and Adaptation: Adapt management prescriptions as a result of changing ecosystem conditions, changing management by others within ecosystems, and improved understanding of the relationship between ecosystem health and land uses. Has the BLM defined limits to the use and development of the lands and resources in habitats within the Monticello Planning Area? Has the BLM formulated a strategy for managing within those limits? Is the BLM using any of the nine principles referenced above? Are there any plans to work with natural processes instead of trying to control natural processes? How does "ecosystem management" and working with natural processes fit into planning the next 10-20 years in the Monticello Planning Area? No information of this sort can be found in this Monticello DRMP/EIS. The BLM must review the monitoring and condition assessments information they have spent many hours gathering and use it to plan according to the BLM's own principles and philosophic framework listed above.		
ECOS Consulting	58	12	The BLM must develop a definition of "sustained yield" when planning resources for sustainability. This is required by FLPMA. What is the BLM's definition of "sustained yield" regarding forestry and woodland products, rangeland resources, sagebrush, pinyon-juniper, etc.? This is not clearly defined in this DRMP/EIS, but it is used as the primary driver in livestock grazing, fire, forestry and woodland products management and the management of other resources. The BLM must define "sustained yield" in measurable and objective elements for the various vegetation communities and use this definition in planning	FLPMA directs BLM to manage public lands for multiple use and sustained yield (Section 102(a)(7)). FLMP defines the term “sustained yield” to mean the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use. This definition is applicable to forestry and woodland products, rangeland resources, sagebrush, pinyon-juniper, etc, which are all renewable resources of the public lands. Various measurable attributes of sustained yield are monitored by the BLM utilizing such techniques as vegetative trend monitoring,	No

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			activities. This is extremely important in order for managers and the public to be able to determine whether or not they are in conformance with FLPMA, and to plan effective management strategies for the next 10-20 years.	riparian Proper Functioning Condition assessments, and Standards for Public Land Health that includes Interpreting Indicators of Rangeland Health (technical reference 1734-6). This level of detail and data are not carried forward into a large scale RMP document due to volume constraints. Yet, management decisions and strategies employ these concepts of FLMPA, including sustained yield. Products of sustained yield are used in a multi-use manner.	
ECOS Consulting	58	13	In this Monticello DRMP/EIS, the BLM has not provided clear, objective, and measurable "Desired Future Conditions" for each vegetation community in the Monticello Planning Area. There are numerous management activities proposed in this Monticello DRMP/EIS that will drastically change conditions on the ground throughout the Planning Area, and do not appear to have measurable and objective habitat goals. Livestock grazing is planned to be allowed on over 90% of the Planning Area. Vegetation treatments are proposed on over 20% of the Planning Area. Forestry and woodland products activities are planned over most of the Planning Area. Mining and energy development has the potential to be widespread. OHV use and routes are proposed in over 90% of the Planning Area. All of these activities, and others, can have extensive long-term adverse direct, indirect, and cumulative impacts on the ecosystem. In considering, these impacts, the BLM must precisely define Desired Future Conditions for each vegetation community in order to effectively manage the resources.	The definition in the Vegetation section for desired future condition (DFC) has been clarified to "Manage vegetation resources for desired future conditions, as determined by site specific BLM objectives and rangeland functionality and health, thereby ensuring ecological diversity, stability, and sustainability, including the desired mix of vegetation types, structural stages, and landscape/riparian/watershed function, and provide for native plant, fish, and wildlife habitats." Therefore, DFC is determined by the BLM utilizing Ecological Site Descriptions and managed to meet ecological process and sustain and/or improve rangeland health. The resources of concern identified by the commenter related to livestock grazing do not require a land use planning decision. These resource values are addressed on a site specific allotment basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management.	Yes
ECOS Consulting	58	20	Pages 3-154 through 3-160: Throughout this section there is no mention of "Desired Future Condition" of these plant communities, yet the BLM will be allowing activities and actively managing as if they knew what future condition they wanted. This is obviously not the case. The BLM must develop detailed "Desired Future Conditions" for each of its major vegetation communities and use these definitions as	A definition for desired future condition (DFC) has been added to the glossary: “The desired mix of vegetation types, structural stages, and landscape/riparian/watershed function, as determined by management objectives and rangeland functionality and health, that ensures ecological diversity, stability and sustainability to provide for plant, fish and wildlife habitats.”	Yes

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			guides for future management. These definitions must include descriptions of the condition of biological soil crusts, vegetation cover, vegetation diversity, and vegetation structure. This must be done now, before 10-20 years of future planning is committed, before this DRMP/EIS is finalized.	Therefore, DFC is determined by the BLM utilizing Ecological Site Descriptions and managed to meet ecological process and sustain and/or improve rangeland health. The resources of concern identified by the commenter related to livestock grazing do not require a land use planning decision. These resource values are addressed on a site specific allotment basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management.	
ECOS Consulting	58	21	Page 3-158, 1st Paragraph: This Monticello DRMP/EIS states: "One of the BLM's highest priorities is to promote ecosystem health and one of the greatest obstacles to achieving this goal is the rapid expansion of invasive, non-native species, or weeds, across public lands." If this is truly one of the BLM's "highest priorities", it would follow that the BLM would at a minimum perform a basic inventory. This is a vital first step in effectively managing invasive weeds or any biological resource. Yet the BLM states: "A systematic weed inventory has not been completed for the planning areas…" This is so, even though this has been a high priority for at least 10 years. It is one thing to state the importance of something, but it is quite another thing to actually do something about it. In this BLM Monticello DRMP/EIS, it is strikingly apparent that the BLM is not really interested in solving this serious ecosystem problem, because it won't even take the first step. The BLM must make a commitment to perform a detailed inventory of invasive weeds within 2 years of finalizing this DRMP/EIS.	The BLM, in conjunction with San Juan County and various partners are continually conducting inventories of invasive, non-native plant species in areas of priority as determined by infestation and threat. Inventories are a continual process due to the dynamics of weed populations and not limited to a single period of time. These inventories enable treatment of invasive, non-native plant species utilizing integrated pest management strategies.	No
ECOS Consulting	58	26	4.3.17.2.2 Impacts of Fire Management Decisions on Vegetation 4.3.17.2.2.1 Alternative A	Fuel reduction projects are implementation actions in which environmental impacts would be analyzed on a case by case, site specific basis following completion of the land use plan. This analysis would consider potential environmental impacts to air, water, and soil.	No

VEG – Vegetation				
Commenter Name	Record ID & Comment Number	Comment Text	Response to Comment	Doc Mod
		Page 4-488, 2nd and 3rd Paragraphs: Here it is stated: "Under all alternatives, fuels management actions would include surface-disturbing treatments on 5,000 to 10,000 acres annually. Over the life of this plan, it is unacceptable that 200,000 acres of "vegetation treatment" be applied that will destroy biological soil crusts and other soil constituents. These impacts have serious adverse impacts on vegetation structure and function within the ecosystem. The BLM does not describe where these treatments are needed, or which type or treatment will be used in the different areas. This information must be included in this Monticello DRMP/EIS.	The Finding of No Significant Impact and Decision Record for the Utah Land Use Plan Amendment for Fire and Fuels Management (UT-USO-04-01) signed in September of 2005 identifies maximum treatment acres and authorizes fuels treatment activities for the Monticello Field Office. The Land Use Plan Amendment, the associated USFW Biological Opinion, and the Resource Protection Measures developed to minimize or avoid resource impacts from fire management actions are incorporated into this RMP. The LUP Amendment incorporated new fire management policy, guidance and directives for BLM-administered lands in Utah, although detailed information regarding fire management goals and objectives was provided in a programmatic Fire Management Plan (FMP). The FMP covers field offices administered by an individual fire district such as the Moab Fire District which oversees fire management for the Monticello Field Office. The LUP Amendment for Fire and Fuels states (Chapter 1, page 1-11) that the [EA] is limited to planning-level analyses and that site-specific analysis of resources such as air, water, soil, and cultural is conducted for individual fire management planning and implementation actions. Public comment was solicited for the LUP Amendment as well as for the Moab Fire District FMP. The EA process also involved collaboration between the public, the BLM and other governmental and local agencies. The LUP Amendment states (Chapter 2, page 2-10) that acreages identified for fire management [in the LUP Amendment and as carried through in the RMP] are broad guidelines useful for the development of field office Fire Management Plans (FMP), and are not “assumed to be quotas, targets or exact limitations.” The FMP covering the Monticello Field Office does include descriptions of individual Fire Management Units (FMUs) for the vegetative	

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				communities within the field office, and outlines general fire management goals for each of those FMUs. The programmatic EA for the FMP (UT-063-04-02, UT-060-2005-042) analyzed the overall direct, indirect and cumulative impacts of fire management goals and objectives. Individual vegetation treatment methods, potential impacts from treatments, and the number of acres proposed for a treatment in a vegetative community or communities would be detailed and analyzed at a project-level basis in a site-specific NEPA document.	
ECOS Consulting	58	28	Mechanical Vegetation Treatments What methods of mechanical vegetation treatments are planned for the Monticello Planning Area? If used in pinyon-juniper, sagebrush, and greasewood, then the trampling and compaction of soils, and the destruction of biological soil crusts will be widespread with a resultant increase in erosion and loss of nutrients, soil moisture, and soil stability. These impacts can have devastating major and long-term direct, indirect, and cumulative impacts. These direct, indirect, and cumulative impacts must be addressed in this DRMP/EIS.	Any Vegetation treatments would be analyzed in site specific NEPA. The goal of the impact analysis is to compare the alternatives. The Finding of No Significant Impact and Decision Record for the Utah Land Use Plan Amendment for Fire and Fuels Management (UT-USO-04-01) signed in September of 2005 identifies maximum treatment acres and authorizes fuels treatment activities for the Monticello Field Office. The Land Use Plan Amendment, the associated USFW Biological Opinion, and the Resource Protection Measures developed to minimize or avoid resource impacts from fire management actions are incorporated into this RMP. The LUP Amendment incorporated new fire management policy, guidance and directives for BLM-administered lands in Utah, although detailed information regarding fire management goals and objectives was provided in a programmatic Fire Management Plan (FMP). The FMP covers field offices administered by an individual fire district such as the Moab Fire District which oversees fire management for the Monticello Field Office. The LUP Amendment for Fire and Fuels states (Chapter 1, page 1-11) that the [EA] is limited to planning-level analyses and that site-specific analysis of resources such as air, water, soil, and cultural is conducted	No

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				for individual fire management planning and implementation actions. Public comment was solicited for the LUP Amendment as well as for the Moab Fire District FMP. The EA process also involved collaboration between the public, the BLM and other governmental and local agencies. The LUP Amendment states (Chapter 2, page 2-10) that acreages identified for fire management [in the LUP Amendment and as carried through in the RMP] are broad guidelines useful for the development of field office Fire Management Plans (FMP), and are not "assumed to be quotas, targets or exact limitations." The FMP covering the Monticello Field Office does include descriptions of individual Fire Management Units (FMUs) for the vegetative communities within the field office, and outlines general fire management goals for each of those FMUs. The programmatic EA for the FMP (UT-063-04-02, UT-060-2005-042) analyzed the overall direct, indirect and cumulative impacts of fire management goals and objectives. Individual vegetation treatment methods, potential impacts from treatments, and the number of acres proposed for a treatment in a vegetative community or communities would be detailed and analyzed at a project-level basis in a site-specific NEPA document.	
ECOS Consulting	58	29	Biological Vegetation Treatments What kinds of biological vegetation treatments are planned for the Monticello planning area? The types used should be listed so that possible impacts can be analyzed. As with other vegetation treatment methods, 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. This is quite a litany of impacts which could have potential widespread and short and long-term	BLM utilizes integrated pest management strategies for treating invasive, non-native species as outlined in the Programmatic Environmental Impact Statement for Vegetation Treatments on Bureau of Land Management Lands in 17 Western States. Site specific treatments utilizing biological control are not currently proposed and future unknown speculation is beyond the scope of the Resource Management Plan. Any potential future use of biological agents in vegetation treatments will adhere to BLM policy and guidance.	No

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			adverse impacts. A listing of possible impacts is not adequate for NEPA analysis. Where is the context information? Where is the analysis of the extent and duration of direct, indirect, and cumulative impacts of using biological agents? Where will biological agents be used? What are the target species and what are the biological agents that will be used? Have any biological vegetation treatments been used in the past in the Monticello Planning Area? How successful have these been? What are the results of monitoring past projects as stipulated in the BMP's and in the Fundamentals of Rangeland Health?		
CrownQuest	62	51	On page 2-57, under the four action alternatives, the BLM proposes to maintain existing land treatments and implements new vegetation treatments to restore ecosystem health and functioning condition for several vegetation cover types on varying numbers of acres of lands within the Monticello RA. See Monticello DRMP/EIS, pg 2--57, Table 2.1. In the final Monticello RMP/EIS, the BLM should provide maps demonstrating the areas in which it plans to implement this management action. Without maps, CrownQuest cannot determine how this management action affects its operations in the Monticello RA.	Implementation areas for new vegetation treatments to restore public land health are not defined at this stage. Therefore, this information cannot be mapped. A map would be available to the general public once these treatments are planned and analyzed in a site-specific NEPA document. The Finding of No Significant Impact and Decision Record for the Utah Land Use Plan Amendment for Fire and Fuels Management (UT-USO-04-01) signed in September of 2005 identifies maximum treatment acres and authorizes fuels treatment activities for the Monticello Field Office. The Land Use Plan Amendment, the associated USFW Biological Opinion, and the Resource Protection Measures developed to minimize or avoid resource impacts from fire management actions are incorporated into this RMP. The LUP Amendment incorporated new fire management policy, guidance and directives for BLM-administered lands in Utah, although detailed information regarding fire management goals and objectives was provided in a programmatic Fire Management Plan (FMP). The FMP covers field offices administered by an individual fire district such as the Moab Fire District which oversees fire management for the Monticello Field Office. The LUP Amendment for Fire and	No

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				Fuels states (Chapter 1, page 1-11) that the [EA] is limited to planning-level analyses and that site-specific analysis of resources such as air, water, soil, and cultural is conducted for individual fire management planning and implementation actions. Public comment was solicited for the LUP Amendment as well as for the Moab Fire District FMP. The EA process also involved collaboration between the public, the BLM and other governmental and local agencies. The LUP Amendment states (Chapter 2, page 2-10) that acreages identified for fire management [in the LUP Amendment and as carried through in the RMP] are broad guidelines useful for the development of field office Fire Management Plans (FMP), and are not "assumed to be quotas, targets or exact limitations." The FMP covering the Monticello Field Office does include descriptions of individual Fire Management Units (FMUs) for the vegetative communities within the field office, and outlines general fire management goals for each of those FMUs. The programmatic EA for the FMP (UT-063-04-02, UT-060-2005-042) analyzed the overall direct, indirect and cumulative impacts of fire management goals and objectives. Individual vegetation treatment methods, potential impacts from treatments, and the number of acres proposed for a treatment in a vegetative community or communities would be detailed and analyzed at a project-level basis in a site-specific NEPA document.	
Mary Moran	145	1	A newly discovered invasive plant species in the southeast Utah Group national parks is not on your list of Invasive and Noxious Weeds (p. 3-159) I found two very small populations of Bromus diandrus (ripgut brome) in the Needles District of Canyonlands and in Arches National Park in the last couple of years.	The list of Invasive and Noxious Weeds of San Juan County (Table 3.58) is adaptable to include newly discovered plant species. Control of invasive, non-native plant species is prioritized by their designation on the State of Utah and San Juan County Noxious Weed lists.	No
Nature Conservancy	214	4	The statement that Upland areas would be managed for "desired future condition" is vague because no specific DFC	Please refer to response to comment 49-20.	Yes

VEG – Vegetation					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Moab Project Office			is defined. The glossary defines desired condition as "Description of those factors, which should exist within ecosystems both to maintain their survival and to meet social and economic needs." However, desired condition depends upon personal use or requirements. For example, desired future condition for a rancher may differ vastly from desired condition for mineral exploration or wildlife.		
Edward Dobson	219	1	Section 3.18.1.6 -- Invasive Plants and Noxious Weeds Although the RMP refers to control of undesirable non-natives as "one of the most significant problems," the range of treatments mentioned is limited to contracting with the San Juan County and surveying the spread of the non-natives. There is no in-depth discussion of the history and no accounting for the success or failure of particular methods of control within the RMP.	Invasive, non-native plants are a dynamic population of the plant community and provide a threat to native systems. Control of these undesired plants utilizes integrated pest management strategies in cooperation with the county and other various entities. Treatment techniques are adjusted on a case-by-case circumstance dependent upon successes and/or failures, thus continually evolving. In-depth discussion of the history of weed populations is beyond the scope of the Resource Management Plan.	No
Edward Dobson	219	2	Another consideration is the unintended consequences for native plants after broadcast application of fire retardant. There needs to be examination and discussion of retardants that are native-species-friendly, and of a let-burn policy within the RMP when human life and structures are not in jeopardy.	The resource protection measures developed for the LUP Amendment have been incorporated into this document. The protection measures are in place to minimize or avoid resource impacts from fire management practices including wildland fire suppression (retardant use), wildland fire use (let-burn), prescribed fire, and non-fire fuel treatments. The environmental analysis of more specific mitigative measures such as types of retardant utilized for fire management are addressed at the fire management plan programmatic level. FMPs are routinely reviewed and revised when new science or monitoring data can be incorporated into the fire management practices of a fire district. As stated in the LUP Amendment (Chapter 2, page 2-1), "…it is acknowledged that environmental conditions pertaining to fire management are constantly in flux due to uncontrollable changes such as invasive species establishment or weather patterns. This [LUP Amendment] is part of an adaptive management	No

VEG – Vegetation				
Commenter Name	Record ID & Comment Number	Comment Text	Response to Comment	Doc Mod
			strategy that refines and updates desired conditions and management strategies as the BLM obtains new information." Although the LUP Amendment (and this RMP) authorizes fuel treatments that include biological control methods, decisions regarding more specific project details such as treatment acreages or the use of particular biological controls (i.e. goats and/or sheep) for fuels treatment in a particularly suited area, would be addressed in the site-specific NEPA analysis for a targeted project.	

VRM – Visual Resource Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Environmental Protection Agency Region 8	1	4	EPA is concerned with BLM's proposal to significantly reduce the overall amount of landscape acreage under VRM Class I/II in Alternative C. Recommend BLM retain most of all VRM Class I/II landscape within the MPA consistent with its Visual Resource Inventory (VRI).	The RMP process establishes specific management objectives for the area's visual resources based on the various resources uses and values. These designations are developed through public participation and collaboration.	No
National Park Service Intermountain Region	3	7	The visual impact analysis should consider night lighting and effects on night sky.	All projects must meet the stated VRM management objectives. BLM VRM analysis tools, including a VRM worksheet, are used during site specific NEPA analysis. Mitigation for flaring, rig lights, or other visual intrusions would be developed based upon this analysis to the degree they are consistent with lease rights.	No
State of Utah	4	44	Chapter 3 discusses visibility in Class I areas. No comparable analysis is contained in chapter 4. The state recommends BLM include a careful analysis of impacts to visibility.	In Chapter 4, impacts to each resource are analyzed by the primary resource. For instance, Table 4.13. Impacts to Cultural Resources under Alternative A includes a reference to visual resource impacts to cultural resources and so on through all alternatives for all resources.	No
State of Utah	4	76	To protect the viewshed in the area surrounding Goosenecks State Park, the state recommends changing the VRM Class from VRM Class III to VRM Class II, changing the oil and gas leasing to NSO and closing the area to mineral material disposal.	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. BLM feels that the range of alternatives reasonably covers the options. For any proposals for leasing, all surrounding uses would be considered and analyzed in a site specific NEPA document. BLM feels this would adequately protect sensitive or scenic areas as those resources would be taken into consideration.	No

VRM – Visual Resource Management					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
State of Utah	4	86	The state objects if the Draft RMP does not make information supporting the VRM inventory class determinations available for review. The state also objects if the rationale for each VRM management class is not presented, nor is the impact on resources fully disclosed in the analysis of impacts.	The BLM will consider the commenter's recommendation to include information supporting the VRM inventory class determinations and the rationale for each VRM management class. BLM feels that the impacts of visual management on resources were fully disclosed for each resource in Chapter 4.	No
State of Utah	4	87	The state has concerns that the BLM's identification of VRM inventory classes has led to a self-effectuating class protection scheme, rather than a source of information to be considered within the proposed resource use allocation schemes within each of the Draft's alternatives.	VRM inventory was completed in the late 1970s and early 1980s. These inventory classes were not changed. Management classes were subject to intensive discussions by an interdisciplinary team of BLM resource specialist using their best expertise and seeking the best compromises among resources to carry out BLM's mandate for multiple use and sustained yield while protecting resource values including visual resources. BLM disagrees with the commenters statement regarding a self-effectuating class protection scheme and stands by its decisions and analysis.	No
San Juan County	7	21	The County objects if the Draft RMP does not make information supporting the VRM inventory class determinations available for review. The County also objects if the rational for each VRM management class is not presented, nor is the impact on resources fully disclosed in the analysis of impacts.	The VRM inventory was completed in the late 1970s and early 1980s. These inventory classes were not changed. Management classes were subject to intensive discussions by an interdisciplinary team of BLM resource specialist using their best expertise and seeking the best compromises among resources to carry out BLM's mandate for multiple use and sustained yield while protecting resource values including visual resources. BLM disagrees with the commenter's statement regarding a self-effectuating class protection scheme and stands by its decisions and analysis.	No
San Juan County	7	22	The County has concerns that the BLM's identification of VRM inventory classes has led to a self-effectuating class protection scheme, rather than a source of information to be considered within the proposed resource use allocation schemes within each of the Draft's alternatives.	Please refer to response to comment 7-21.	No

VRM – Visual Resource Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Southern Utah Wilderness Alliance	26	90	BLM must prepare and maintain on a continuing basis an inventory of visual values for each RMP effort.	BLM Manual 8400 – Visual Resource Management states: 1. "The Bureau shall prepare and maintain on a continuing basis an inventory of visual values on all public lands. . . 2. Visual management objectives (classes) are developed through the RMP process for all Bureau lands. The approved VRM objectives shall result from, and conform with, the resource allocation decision made in the RMPs." In the case of the current RMP process, the Monticello Field Office resource specialists reviewed the current visual resource inventory classes and made a joint decision to accept them as they were as the inventory. Through an extensive team process, visual management classes were then developed taking into consideration the inventory class and relevant resource values of an area including visual resources as well as other values and consumptive and non-consumptive uses. The BLM stands by its findings of visual resource inventory and management classes in the current RMP process.	No
Southern Utah Wilderness Alliance	26	91	Lands proposed for wilderness designation, WSA or lands with wilderness characteristics should be managed as Class I.	All Wilderness Study Areas are designated as VRM I. Non-WSA lands to be managed to protect their wilderness characteristics are designated as VRM II, as are many popular scenic attractions. Those ACECs that are proposed for management in Alt C are designated as either VRM I and II.	No
Southern Utah Wilderness Alliance	26	92	Lands with popular and easily accessible vantage points should be managed for visual resources, such as VRM Class II to retain the existing character of the landscape including clear provisions dealing with oil and gas development and other human disturbances.	The BLM has designated VRM management for the entire planning area within the DRMP/EIS. The scenic values of the planning area are placed in appropriate management classes by alternative.	No
Southern Utah Wilderness Alliance	26	93	ACECs and other special management designations and prescriptions should be used to protect scenic landscapes and viewpoints.	The BLM gave full consideration to the designation and preservation of ACECs during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period.	No

VRM – Visual Resource Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				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. The FLPMA further requires public lands to be managed under the principles of multiple use and sustained yield. This means that even though an area is determined to have relevance and importance as an ACEC, all other management options for the land are not automatically precluded. The BLM may choose to manage the lands in a manner that does not protect the relevant and important values identified during the ACEC review process, or that protect those values via management decisions that do not require an ACEC designation. Varying VRM classes were considered in the range of alternatives. The ID team used VRM classes to protect scenic landscapes and viewpoints.	
Southern Utah Wilderness Alliance	26	94	Lands within America's Red Rock Wilderness Act should be managed VRM Class I or VRM Class II.	The BLM has no obligation to designate lands within the Red Rock Wilderness Act as VRM I or II. The BLM's VRM designations rely on the underlying VRM inventory.	No
Lynell Schalk	29	3	Indian Creek ACEC Alternative B states that it is the "same as Alternative A	The document has been changed to correct duplications between alternatives A and B.	Yes

VRM – Visual Resource Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			except…" (Reference: pg. 2-40, Vol. 1). Alternative B then repeats several of the same "prescriptions" as are in Alternative A, i.e. "closed to OHV use," "managed as a VRM Class I," "available for livestock use," "unavailable for disposal of mineral materials," etc. Many of the listed "exceptions" are not exceptions at all, making it doubly difficult for the reader to determine the difference in the alternatives.		
National Parks Conservation Association	44	4	Night skies are an intrinsic natural resource at the national parks including Canyonlands National Park, Glen Canyon NRA, Natural Bridges and Hovenweep National Monuments 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, from degraded night-skies.	All projects must meet the stated VRM management objectives. BLM VRM analysis tools, including a VRM worksheet, are used during site specific NEPA analysis. Mitigation for flaring, rig lights, or other visual intrusions would be developed based upon this analysis to the degree they are consistent with lease rights. The Sigurd Power Plant is neither in nor near the Monticello Field Office area.	No
EOG Resources	60	39	The BLM, characterizes the impacts of the proposed restrictions under Alternative E as "Same as Alternative A, though fewer acres of VRM III and VRM IV." Similarly, although the BLM proposes to increase the number of VRM Class I areas by approximately 125,000 acres under Alternative B, the BLM concludes that impacts would be the "Same as Alternative A." These descriptions drastically understate the substantial impacts of managing such large areas under the stringent VRM Class I restrictions. The BLM correctly notes elsewhere in the Monticello DRMP/EIS that "[designation of an area as VRM Class I essentially closes the area to mineral resource activity." Monticello DRMP/EIS, pg 4-95. A VRM Class I designations would result in limited	NEPA requires a Federal agency to consider a range of reasonable alternatives (40 C.F.R. §1502.14). 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 purpose of the DEIS and DRMP is to take a hard look at the current situation and BLM contends that a hard look was taken using all required laws and regulations. BLM feels that the range of alternatives reasonably covers options.	No

VRM – Visual Resource Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			construction of new structures and the imposition of no surface occupancy stipulations on any future mineral leases. Monticello DRMP/EIS, pg 4-544. When such large areas are designated NSO leasing, access to individual leases can be impossible. The BLM must revise its descriptions on page 2-114 to disclose the substantial impacts of the proposed VRM management under Alternatives B and E.		
CrownQuest	62	52	CrownQuest encourages the BLM not to adopt the VRM designations proposed under Alternative E. This alternative unnecessarily restricts oil and gas development within the planning area. Furthermore, these designations misuse the VRM classification process. As the IBLA has recognized, existing resource allocation decisions should determine the appropriate VRM classification. "It is not contemplates that the RMP resource allocation systems will contravene the VRM classifications" established in an RMP. Southern Utah Wilderness Alliance, et. Al., 144 IBLA 70, 84 (1998).	This comment represents the preference of the commenter.	No
CrownQuest	62	68	On page 2-114, the BLM understates the significant economic impacts of the proposed VRM management restrictions under Alternatives B and E. See Monticello DRMP/EIS, pg 2-114, Table 2.2.	Table 2.2 has been changed to more adequately describe the impacts. Analysis of these impacts can be found in sections 4.3.7.4.9 and 4.3.12.2.10 of the FEIS. Please also refer to response to comment 62-64.	Yes
CrownQuest	62	69	These descriptions drastically understate the substantial impacts of managing such large areas under the stringent VRM Class I restrictions. The BLM correctly notes elsewhere in the Monticello DRMP/EIS that "[designation of an area as VRM Class I essentially closes the area to mineral resource activity.	Visual Resource Management classes were subject to intensive discussions by an interdisciplinary team of BLM resource specialist using their best expertise and seeking the best compromises among resources to carry out BLM's mandate for multiple use and sustained yield while protecting resource values including visual resources.	No
CrownQuest	62	89	The BLM's statement that "the demand for a range of recreation opportunities would not be limited as a result of the VRM classifications, so impacts to socioeconomics from recreation visitation would be minor under all alternatives," is misleading because it suggests that recreational opportunities will yield economic benefits in the Monticello	The BLM does not suggest that “recreational opportunities will yield economic benefits to offset negative economic impacts of restricting oil and gas development.” The projected increase in recreation revenues is independent of any impacts on oil and gas development. Since the projected number of wells per year is 5 in all Alternatives, except E, the negative	No

VRM – Visual Resource Management					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			RA that will offset or outweigh the negative economic impacts of restricting oil and gas development. The BLM lacks data to support its underlying premise that increased recreational opportunities will yield significant economic benefits.	economic impacts of restricting oil and gas development is found only in Alternative E. The BLM states in Chapter 4: Socioeconomics, in analyzing alternative E: "As with VRM management, the restrictions on development under this alternative have the greatest potential to restrict economic opportunities for those whose livelihood depends all or in part on the restricted activities. This would be particularly true in the case of minerals development and motorized recreation". Thus, the impact of Alternative E on the economic benefits of oil and gas development is analyzed and stated clearly.	

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Environmental Protection Agency Region 8	1	9	EPA recommends that certain non-WSA lands with wilderness characteristics be managed for wilderness characteristics to help ensure protection of sensitive resources from impacts associated with heavy recreational use (OHVs) and other surface disturbing activities.	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. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process (findings from this review are available at the Monticello Field Office in the Administrative Record. 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. Wilderness character units sent forward for management of their wilderness characteristics in the FEIS are a result of this process.	No
State of Utah	4	21	The State asks BLM to provide a detailed explanation of the rationale and authority for management of lands solely because of wilderness characteristics, and why such management does not circumvent the provisions of the statutorily required wilderness review process.	The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from the Federal Land Policy and Management Act (FLPMA) Section 202 (U.S.C. § 1712). This section of the 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 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 1039(c) (43 U.S.C. § 1702(c)).	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				FLPMA intended 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 use for current and future generations. The Norton-Leavitt Agreement recognizes that nothing in the Agreement shall be construed to diminish the Secretary's authority under FLPMA to manage a tract of land that has been dedicated to a specific use. IM 2003-275-Change 1 which is a direct outcome of the Norton-Leavitt Agreement states, "the BLM may consider information on wilderness characteristics along with information on other uses and values when preparing land use plans". The IM goes on to say "considering wilderness characteristics in the land use planning process may result in several outcomes including, but not limited to, …emphasizing the protection of some or all of the wilderness characteristics as a priority over other multiple uses" (although the area will not be designated as a WSA). The IM also states "typically, resource information contained in the BLM wilderness inventories was collected to support a land use planning process. Public wilderness proposals represent a land use proposal. In either case the BLM is authorized to consider such information in preparation of a land use plan amendment or revision". In September 2006, Judge Benson, whose court approved the Norton-Leavitt Agreement, stated that the Agreement did not strip the BLM of its powers to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when	

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				protected as WSAs.	
State of Utah	4	22	The BLM should give strong consideration to recommendations submitted by local government and not manage lands to protect wilderness character where such management would, in the opinion of local governments, be contrary to the interests of local residents.	Secs. 103, 201, and 202 of the Federal Land Policy and Management Act (FLPMA) direct the BLM to take into account the national interest as well as the local interest. In accordance with FLPMA and BLM rules, regulations, and policies, the BLM must provide management for all resources and resource uses on public lands. Strong consideration was given to local governments. San Juan County is a cooperating agency in the entire land use planning process including in the development of alternatives where non-WSA areas with wilderness characteristics were considered.	No
State of Utah	4	23	BLM should consider the existence of inholdings and valid existing rights (VER) where development of inholdings or VER may compromise management and protection of areas with wilderness characteristics.	Valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria 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.	No
State of Utah	4	24	The state strongly suggests BLM give serious consideration to San Juan County's new field information concerning areas asserted by BLM to have wilderness characteristics.	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	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.	
State of Utah	4	33	The BLM inconsistently applied road data between the 1999 inventory and the 2007 WC review.	The Wilderness Study Area Interim-Management Policy (“IMP” or “WSA handbook”) applied to inventories conducted prior to 2004. In 2004 BLM settled ongoing litigation with the State of Utah (known now as the Utah v. Norton Settlement Agreement). The IMP emphasized the difference between roads and "ways". A road was considered an impact on wilderness characteristics and needed to be excluded from the inventory unit. A “way” however, was not considered in and of itself a sufficient impact on naturalness to disqualify all or part of an inventory unit. Inventories conducted post-2004 applied current policy, which is based on IM 275-2003, Change 1 which emphasizes naturalness and does not distinguish roads from ways. The BLM has evaluated wilderness characteristics since 2004 on the basis of impacts to naturalness which could include both roads and ways.	No
State of Utah	4	34	The BLM should not consider undeveloped leases and potential for future development when it determines whether areas possess wilderness characteristics. The possibility of future development is irrelevant. It is only appropriate to consider this information when deciding whether to protect areas found to possess wilderness characteristics.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, Reasonable Foreseeable Development (RFD) data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. RFDs were used to assist in determining what impacts were on the ground at the time of the 2007 Wilderness Character Review process to help determine naturalness. RFDs were not used	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				to determine potential future scenarios for Oil and Gas Development. RFDs (potential Oil and Gas Development Scenarios) were used in determining what units would be managed for wilderness characteristics in the FEIS. This process allows the ID team to look at all resources during wilderness characteristics inventory maintenance. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	
State of Utah	4	35	The BLM needs to consider the new information on roads (2007) to reevaluate the findings of the 1999/2003 wilderness inventory.	The 2003 Revision Document for the Monticello Field Office made adjustments to Wilderness Inventory Areas based on county road data, none of which differs from the current county inventory. BLM stands by its 1999/2003 data.	No
State of Utah	4	36	The BLM should clarify whether Grand Gulch WC area, units A and B, possess outstanding opportunities for solitude or primitive and unconfined type of recreation as required. If BLM relies on the existence of outstanding opportunities within the contiguous WSA to satisfy this requirement then BLM should clarify how these requisite values can be satisfied at another location.	The wilderness character review process used specific guidelines in determining whether or not the areas possessed wilderness character. Appendix O briefly discusses the criteria used in this process. These areas are not the same as Wilderness or Wilderness Study Areas. The documents relevant to the wilderness character review process in 2007 are available at the Monticello Field Office, on the Monticello web site and in the administrative record.	No
State of Utah	4	37	The BLM should clarify whether the National Forest system roadless area adjacent to the Hammond Canyon WC area has been administratively endorsed for wilderness. If no, then BLM should explain the apparent departure from the 5,000 acre minimum size standard.	The National Forest Service area in question has not been determined by that agency to possess wilderness characteristics (itself a BLM term), and its adjacency is irrelevant. Although the unit does not officially meet the 5,000 acre size requirement, and it is not contiguous to lands that possess Wilderness Characteristics, it is bordered on the east side by Ute Tribal Lands and on the west side by USFS Roadless Lands, which significantly limits motorized use. The 4, 702 acres identified in Hammond Canyon consist of only public lands administered by the BLM and does not include any USFS Roadless Lands and was found to possess wilderness characteristics.	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
State of Utah	4	38	The review form for the Upper Red Canyon WC area notes "much of the mining activity in the area is still visible in the form of audits or waste dumps". Also, opportunities for solitude or primitive and unconfined type of recreation are not described as being outstanding in character. Please clarify 1) the standard applied to determine the existence of naturalness and, 2) whether Upper Red Canyon WC area possesses the requisite outstanding opportunities for solitude or primitive and unconfined type of recreation.	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. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance. The ID team during the 2007 Wilderness review determined the surface disturbances noted in the 1979 inventory have naturally rehabilitated. Mining activity in the area while still visible is not considered to be a substantial impact to the naturalness of the area. With minimal evidence of continued human disturbances, opportunities for solitude can be found throughout the area.	No
State of Utah	4	39	The opportunities for solitude or a primitive and unconfined type of recreation in the White Canyon WC area are not described as being outstanding in character. Please clarify whether opportunities must be outstanding in nature and whether the White Canyon WC area possesses these requisite values.	The 2007 wilderness character review examined 15 areas in the White Canyon area and found 3 of those areas to possess wilderness characteristics. The files relevant to the wilderness character review from 2007 are available in the administrative record and will provide specific information on the values of those areas reviewed.	No
State of Utah	4	40	The review forms for the Bridger Jack Mesa, Indian Creek (A,B,C), White Canyon #8 and White Canyon #9 WC's indicate that outstanding opportunities for solitude are not present within the units themselves, but exist within contiguous WSAs, national parks, or wilderness inventory areas. Please clarify how the existence of requisite values can be satisfied by adjacent lands.	The ID team during the 2007 Wilderness review determined "Because of their size, opportunities for solitude or primitive recreation is limited, but exist when considered with the contiguous WIA and the AE lands within CNP".	No
San Juan	7	15	Managing Non-WSA Lands for so-called wilderness	The BLM's authority for managing lands to protect or enhance	No

WC – Wilderness Characteristics					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
County			characteristics violates FLPMA, Utah Code 63-38d-401(6)(b), the San Juan County master plan, the Norton-Leavitt Agreement and other agreements. The County asks BLM to provide a detailed explanation of the rationale and authority for management of lands solely because of WC, and why such management does not circumvent the provisions of the statutorily required wilderness review process.	wilderness characteristics comes directly from the Federal Land Policy and Management Act (FLPMA) Section 202 (U.S.C. § 1712). This section of the 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 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 1039(c) (43 U.S.C. § 1702(c)). FLPMA intended 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 use for current and future generations. The Norton-Leavitt Agreement recognizes that nothing in the Agreement shall be construed to diminish the Secretary's authority under FLPMA to manage a tract of land that has been dedicated to a specific use. IM 2003-275-Change 1 which is a direct outcome of the Norton-Leavitt Agreement states, "the BLM may consider information on wilderness characteristics along with information on other uses and values when preparing land use plans". The IM goes on to say "considering wilderness characteristics in the land use planning process may result in several outcomes including, but not limited to, …emphasizing the protection of some or all of the wilderness characteristics	

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				as a priority over other multiple uses" (although the area will not be designated as a WSA). The IM also states "typically, resource information contained in the BLM wilderness inventories was collected to support a land use planning process. Public wilderness proposals represent a land use proposal. In either case the BLM is authorized to consider such information in preparation of a land use plan amendment or revision". In September 2006, Judge Benson, whose court approved the Norton-Leavitt Agreement, stated that the Agreement did not strip the BLM of its powers 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.	
San Juan County	7	16	The BLM inconsistently applied road data between the 1999 inventory and the 2007 WC review.	The Wilderness Study Area Interim-Management Policy (“IMP” or “WSA handbook”) applied to inventories conducted prior to 2004. In 2004 BLM settled ongoing litigation with the State of Utah (known now as the Utah v. Norton Settlement Agreement). The IMP emphasized the difference between roads and "ways". A road was considered an impact on wilderness characteristics and needed to be excluded from the inventory unit. A “way” however, was not considered in and of itself a sufficient impact on naturalness to disqualify all or part of an inventory unit. Inventories conducted post-2004 applied current policy, which is based on IM 275-2003, Change 1 which emphasizes naturalness and does not distinguish roads from ways. The BLM has evaluated wilderness characteristics since 2004 on the basis of impacts to naturalness which could include both roads and ways.	No
San Juan	7	17	The BLM should not consider undeveloped leases and	As part of its wilderness characteristics inventory	No

WC – Wilderness Characteristics					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
County			potential for future development when it determines whether areas possess wilderness characteristics. The possibility of future development is irrelevant. It is only appropriate to consider this information when deciding whether to protect areas which have been found to possess wilderness characteristics.	maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, Reasonable Foreseeable Development (RFD) data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. RFDs were used to assist in determining what impacts were on the ground at the time of the 2007 Wilderness Character Review process to help determine naturalness. RFDs were not used to determine potential future scenarios for Oil and Gas Development. RFDs (potential Oil and Gas Development Scenarios) were used in determining what units would be managed for wilderness characteristics in the FEIS. This process allows the ID team to look at all resources during wilderness characteristics inventory maintenance. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	
San Juan County	7	18	The BLM needs to consider the new information on roads (2007) to reevaluate the findings of the 1999/2003 wilderness inventory and discuss any changes to BLM's 1999/2003 determination of WC that result from more recent route information and intrusion information.	The 2003 Revision Document for the Monticello Field Office made adjustments to Wilderness Inventory Areas based on county road data, none of which differs from the current county inventory. BLM stands by its 1999/2003 data. 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. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process. The BLM is confident of the high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
San Juan County	7	26	San Juan County is opposed to any non- WSA wilderness designations described in 1.3.1.3, Non-Wilderness Study Areas (WSA) Lands with Wilderness Characteristics on pg. 1-6.	The commenter's preference is noted.	No
San Juan County	7	65	Managing non-WSA Lands for wilderness characteristics under Alternative E would: 1) Violate Federal Law, BLM Policy, and the State of Utah/Department of Interior Settlement Agreement of 2003; 2) Clash with State and Local Policies and Plans for managing those lands and thus violate the consistency requirement of FLPMA Section 202 (c)(9); and 3) Arbitrarily and capriciously ignore the documentation and information submitted by San Juan County which show that the subject lands lack true wilderness character.	The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from the Federal Land Policy and Management Act (FLPMA) Section 202 (U.S.C. § 1712). This section of the 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 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 1039(c) (43 U.S.C. § 1702(c)). FLPMA intended 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 use for current and future generations. The Norton-Leavitt Agreement recognizes that nothing in the Agreement shall be construed to diminish the Secretary's authority under FLPMA to manage a tract of land that has been dedicated to a specific use. IM 2003-275-Change 1 which is a direct outcome of the Norton-Leavitt Agreement states, "the BLM may consider	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				information on wilderness characteristics along with information on other uses and values when preparing land use plans". The IM goes on to say "considering wilderness characteristics in the land use planning process may result in several outcomes including, but not limited to, …emphasizing the protection of some or all of the wilderness characteristics as a priority over other multiple uses" (although the area will not be designated as a WSA). The IM also states "typically, resource information contained in the BLM wilderness inventories was collected to support a land use planning process. Public wilderness proposals represent a land use proposal. In either case the BLM is authorized to consider such information in preparation of a land use plan amendment or revision". In September 2006, Judge Benson, whose court approved the Norton-Leavitt Agreement, stated that the Agreement did not strip the BLM of its powers 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. The proposed FEIS will state that the MFO will manage 88,871 acres for wilderness characteristics. This acreage includes Dark Canyon (11,540 acres), Mancos Mesa (30,068 acres), Nokai Dome West (14,988 acres), Nokai Dome East (18,618 acres) and Grand Gulch (13,657 acres). Management prescriptions include: All existing improvements could be maintained at their current level. VRM II for surface disturbing activities. No Surface Occupancy for Dark Canyon and Closed to leasing for Mancos Mesa, Nokai Dome West, Nokai Dome East and Grand Gulch.	

WC – Wilderness Characteristics					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
				OHV travel limited to designated roads and trails. Avoidance areas for rights-of-way. Fire suppression on non-WSA lands with wilderness characteristics would be through light on the land techniques. The BLM feels this represents a balance approach to managing wilderness characteristics and providing for mandated multiple use.	
Rising Sun 4x4 Club	16	1	Commenter states that recreation zones, ACECs, and wilderness character areas create a de-facto wilderness management and is unlawful. If approved as WC areas, these areas would essentially be “locked up”.	Management of non-WSA lands with wilderness characteristics is being considered as an option in this land use planning process for those lands that the BLM has determined have wilderness characteristics. Pursuant to the FLPMA and the Land Use Planning Handbook (BLM 2005a), the BLM may not establish new WSAs, but may consider managing non-WSA lands with wilderness characteristics through land-use planning, and has the option to manage such lands in a way that would protect or preserve some or all of those characteristics. This may include protecting certain lands in their natural condition and providing outstanding opportunities for solitude and primitive and unconfined types of recreation. The existing RMP does not reflect the current level of use and the demands on certain resources, including ACECs, wild and scenic rivers, wilderness areas, and WSAs, within the Monticello PA. BLM policy and regulations require that priority be given to designation and protection of ACECs during land-use planning.	No
Spear	19	2	Speaking of non-WSA lands with wilderness characteristics the commenter states that BLM should not consider more wilderness.	Management of non-WSA lands with wilderness characteristics is being considered as an option in this land use planning process for those lands that the BLM has determined have wilderness characteristics. Pursuant to the	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				FLPMA and the Land Use Planning Handbook (BLM 2005a), the BLM may not establish new WSAs, but may consider managing non-WSA lands with wilderness characteristics through land-use planning, and has the option to manage such lands in a way that would protect or preserve some or all of those characteristics. This may include protecting certain lands in their natural condition and providing outstanding opportunities for solitude and primitive and unconfined types of recreation.	
Red Rock 4-Wheelers	20	3	The identification of Non-WSA lands with Wilderness Characteristics was outside the scope of analysis for the BLM RMP.	The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics."	No
U4WDA	21	4	BLM should not create artificial wilderness by designating it as a land with wilderness characteristics.	Management of non-WSA lands with wilderness characteristics is being considered as an option in this land use planning process for those lands that the BLM has determined have wilderness characteristics. Pursuant to the FLPMA and the Land Use Planning Handbook (BLM 2005a), the BLM may not establish new WSAs, but may consider managing non-WSA lands with wilderness characteristics through land-use planning, and has the option to manage such lands in a way that would protect or preserve some or all of those characteristics. This may include protecting certain lands in their natural condition and providing outstanding opportunities for solitude and primitive and unconfined types	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				of recreation.	
Capital Trail Vehicle Association	23	7	Commenter alludes wilderness character (WC) areas create a de-facto wilderness management and is unlawful. Also, that something should be done with WSAs - designate or release.	Management of non-WSA lands with wilderness characteristics is being considered as an option in this land use planning process for those lands that the BLM has determined have wilderness characteristics. Pursuant to the FLPMA and the Land Use Planning Handbook (BLM 2005a), the BLM may not establish new WSAs, but may consider managing non-WSA lands with wilderness characteristics through land-use planning, and has the option to manage such lands in a way that would protect or preserve some or all of those characteristics. This may include protecting certain lands in their natural condition and providing outstanding opportunities for solitude and primitive and unconfined types of recreation.	No
Blue Ribbon Coalition	24	13	Commenter alludes wilderness character (WC)areas create a de-facto wilderness management and is unlawful. Discusses the flaws of the 1999 Wilderness Re-Inventory process particularly the lack of public participation and that the WC analysis relied heavily on the re-inventory and is therefore also flawed. They question why, if OHV use did not impact the presence or absence of WC, then what rationale is the BLM using to propose the elimination of that use?	Management of non-WSA lands with wilderness characteristics is being considered as an option in this land use planning process for those lands that the BLM has determined have wilderness characteristics. Pursuant to the FLPMA and the Land Use Planning Handbook (BLM 2005a), the BLM may not establish new WSAs, but may consider managing non-WSA lands with wilderness characteristics through land-use planning, and has the option to manage such lands in a way that would protect or preserve some or all of those characteristics. This may include protecting certain lands in their natural condition and providing outstanding opportunities for solitude and primitive and unconfined types of recreation. The existing RMP does not reflect the current level of use and the demands on certain resources, including ACECs, wild and scenic rivers, wilderness areas, and WSAs, within the Monticello PA. BLM policy and regulations require that priority be given to designation and protection of ACECs during land-	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				use planning.	
Trails Preservation Alliance	25	2	Commenter states that the MFO appears to be manufacturing wilderness in the discussion of non-Wilderness Areas with Wilderness characterizes.	Management of non-WSA lands with wilderness characteristics is being considered as an option in this land use planning process for those lands that the BLM has determined have wilderness characteristics. Pursuant to the FLPMA and the Land Use Planning Handbook (BLM 2005a), the BLM may not establish new WSAs, but may consider managing non-WSA lands with wilderness characteristics through land-use planning, and has the option to manage such lands in a way that would protect or preserve some or all of those characteristics. This may include protecting certain lands in their natural condition and providing outstanding opportunities for solitude and primitive and unconfined types of recreation.	No
Southern Utah Wilderness Alliance	26	10	The dismissal of the Redrock Heritage Proposal is a clear indication of the BLM's refusal to entertain a responsible "opposing view" in the planning process.	The Redrock Heritage Proposal was considered the Draft RMP/EIS on pg. 2-151 as an alternative considered but eliminated from detailed analysis. Although, it was not a complete alternative, components of the plan were carried forward for analysis in all the action alternatives. Alts B and E were developed as environmentally protective alternatives with 582,360 acres closed to cross country travel and routes not designated.	No
Southern Utah Wilderness Alliance	26	32	The commenter alleges that "BLM fails to provide for these quieter opportunities most acutely in the WSAs and non-WSA lands with wilderness character." The commenter states that there are few if any places a non-motorized user can go to escape the sights and sounds of ORVs in popular visitation areas of the field office.	Alternative E provides protection for lands with wilderness characteristics by closing nearly 586,000 acres (about 32% of the public lands) to travel. Only routes that existed at the time the WSAs were created have been included in the travel plan. But all cross country travel is restricted in WSAs. Nearly 55% of the lands are protected from ORV cross country travel and routes have been severely restricted in Alternatives B and E.	No
Southern Utah Wilderness Alliance	26	33	The BLM unjustifiably rejected the Red Rock Heritage Proposal. The BLM has dismissed the Red Rock Heritage Proposal entirely not even incorporating any of the excellent recommendations into the conservation alternative.	The Redrock Heritage Proposal was considered the Draft RMP/EIS on pg. 2-151 as an alternative considered but eliminated from detailed analysis. Although, it was not a complete alternative, components of the plan were carried	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				forward for analysis in all the action alternatives. Alt B and E were developed as environmentally protective alternatives with 582,360 acres closed to cross country travel and routes not designated.	
Southern Utah Wilderness Alliance	26	35	The preferred alternative does not sufficiently protect BLM roadless lands (i.e. non-WSA lands with wilderness characteristics.) Until the wilderness issues are settled by legislative means, BLM should manage all wilderness characteristics areas to prevent actions causing degradation of their wilderness characteristics.	The DRMP/EIS considered a range of alternatives for protecting lands identified by the BLM as non-WSA lands with wilderness characteristics. All lands identified by the BLM as non-WSA lands with wilderness characteristics are protected from development in Alt E. Under the land use planning process the BLM must consider a range of alternatives for the non-WSA lands identified with wilderness characteristics but the management of these lands is discretionary. The BLM is not required to protect the wilderness characteristics of these lands.	No
Southern Utah Wilderness Alliance	26	36	SUWA and others maintain that many wilderness quality lands have yet to be appropriately identified as possessing wilderness characteristics by the BLM. There remain some areas that the BLM has yet to conduct an appropriate on-the-ground 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). SUWA contends that BLM has only performed a cursory assessment of these wilderness character units.	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. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. The BLM stands by its findings of its wilderness characteristics inventory maintenance. The BLM determined that 582,360 acres were found to contain wilderness characteristics and all are proposed for protective management in Alt E. The BLM stands by its inventory.	No
Southern Utah Wilderness Alliance	26	37	Allen Canyon Unit – The commenter alleges that BLM abandoned identification of wilderness character within these units through arbitrary methods (i.e. the need to exceed 5,000 acres for standalone units.). “Not only is this inaccurate, it does not follow any current BLM laws or policies and is derived from misguided Utah State BLM	Monticello BLM took into consideration the language of the 1964 Wilderness Act, and concluded that a size criterion is an important indicator of whether or not outstanding opportunities for solitude and or/ primitive recreation exist. Areas of less than 5000 acres are generally not large enough to provide for these opportunities. Areas less than 5,000 acres were	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			direction only."	reviewed for Wilderness Characteristics, in general, the size criterion of 5,000 acres was applied only to units not contiguous with other federal lands previously determined to have wilderness characteristics. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	
Southern Utah Wilderness Alliance	26	38	Allen Canyon Unit – The commenter states, "BLM relies here to justify this incorrect assessment by noting that there are 'established BLM practice with wilderness inventory," when assessing areas contiguous to larger roadless area of public land." "The Bureau Manual Handbook, Wilderness Inventory and Study Procedures (H-6310-1), from which this established practice is derived was rescinded by the April 2003 settlement agreement" between Norton and the State of Utah (IM-2003-195). "…wilderness inventory policy – that contiguous lands must be endorsed for wilderness designation in order to permit the local field office to consider cumulative areas with wilderness characteristics – is no longer valid."	Monticello BLM took into consideration the language of the 1964 Wilderness Act, and concluded that a size criterion is an important indicator of whether or not outstanding opportunities for solitude and or/ primitive recreation exist. Areas of less than 5000 acres are generally not large enough to provide for these opportunities. Areas less than 5,000 acres were reviewed for Wilderness Characteristics, in general, the size criterion of 5,000 acres was applied only to units not contiguous with other federal lands previously determined to have wilderness characteristics. The BLM stands by its findings of its wilderness characteristics inventories and WCR process	No
Southern Utah Wilderness Alliance	26	39	Allen Canyon Unit - The commenter states that the BLM guidance is now the Wilderness Act and FLPMA, neither of which requires that lands must be administratively endorsed for wilderness in order to permit cumulative review.	Monticello BLM took into consideration the language of the 1964 Wilderness Act, and concluded that a size criterion is an important indicator of whether or not outstanding opportunities for solitude and or/ primitive recreation exist. Areas of less than 5000 acres are generally not large enough to provide for these opportunities. Areas less than 5,000 acres were reviewed for Wilderness Characteristics, in general, the size criterion of 5,000 acres was applied only to units not contiguous with other federal lands previously determined to have wilderness characteristics. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness	26	40	Allen Canyon Units – The commenter states, "See Exhibit D for Allen Canyon Map A, B, and C for BLM lands continuing	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Alliance			to need a wilderness character and characteristic identification. Finally, at Exhibit F, SUWA provides the BLM with in depth, detailed and significant new information for the Allen Canyon wilderness character unit.”	knowledge, ID Team review, oil and gas wells, GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The area to which the commenter refers is part of the lands proposed for wilderness in HR 1500 and was assessed in the 2007 WCR and found not to have WC. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	
Southern Utah Wilderness Alliance	26	41	Arch Canyon 1 Unit – The commenter states that BLM concluded that some of the original 4,461 acres in this unit were reduced to 3,200 acres due to visual impacts, and that these impacts should be visible to the casual observer, and if present, should have used these disturbances as boundaries, opposed to excluding the remaining BLM lands the agency found to be natural.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	42	Arch Canyon 1 Unit – The commenter states that the “BLM size criteria and non-wilderness character determination is not based on current BLM laws or policies.”	Monticello BLM took into consideration the language of the 1964 Wilderness Act, and concluded that a size criterion is an important indicator of whether or not outstanding opportunities for solitude and or/ primitive recreation exist. Areas of less than 5000 acres are generally not large enough to provide for these opportunities. Areas less than 5,000 acres were reviewed for Wilderness Characteristics, in general, the size criterion of 5,000 acres was applied only to units not contiguous with other federal lands previously determined to have wilderness characteristics. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	43	Arch Canyon 1 Unit - BLM handbook (H-6310-1) was rescinded by the Norton/Utah Settlement, and thus “any “established” BLM Wilderness inventory policy – that contiguous lands must be endorsed for wilderness	The National Forest Service area in question has not been determined by that agency to possess wilderness characteristics (itself a BLM term), and its adjacency is irrelevant.	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			designation in order to permit the local field office to consider cumulative areas with wilderness characteristics – is no longer valid." Because of this, the commenter states that now BLM must rely on the Wilderness Act and FLPMA for guidance, neither of which state that a unit must be contiguous to an area that has been formally administratively for wilderness.		
Southern Utah Wilderness Alliance	26	44	Arch Canyon 1 Unit – The commenter states that significant new information, dated April 12, 2007, was submitted for this unit and BLM will need to correctly identify the area as retaining a wilderness character for all RMP planning purposes.	The area in question was determined to lack wilderness characteristics in the 1999 inventory and the 2007 wilderness characteristics review. These efforts by BLM took place shortly before the current plan revision, and the BLM stands by its conclusions. New information submitted by SUWA was reviewed and it was found the new information was not significantly different; new information did not justify changing previous wilderness review findings and these units have no reasonable probability of wilderness values.	No
Southern Utah Wilderness Alliance	26	45	Arch Canyon 2 Unit – The commenter alleges that the BLM did not properly inventory the area in the 1999 inventory, and did not perform proper supplemental wilderness characteristic assessments/reviews.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 1979 Wilderness Inventory documentation, as well as the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	46	Arch Canyon 2 Unit – The commenter states that the UWC provided BLM with comments during the 1999 Re-Inventory highlighting this area and an old route was never assessed. The Ute's closure of this route on its property should be considered. BLM again did not properly assess this route in	This area was not assessed in 1999. This unit was determined in the 2007WCR not to possess WC because of it' size (1968 acres) and that it is non-contiguous to lands with WC. As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			the 2007 WCR and did not properly assess the significant new information submitted by SUWA on April 12, 2007.	knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness	
Southern Utah Wilderness Alliance	26	47	Arch Canyon 5 Unit – The commenter alleges that BLM only assessed this area based on size criteria alone and did not consider that the eastern boundary of the unit, which becomes a pack trail to the north. The commenter alleges that the BLM did not properly inventory this unit in the 1999 inventory, and did not perform proper supplemental wilderness characteristic assessments/reviews. BLM has not correctly assessed new information provided by the commenter.	This unit was determined in the 2007WCR not to possess WC because of its size (3490 acres) and that it is non-contiguous to lands with WC. 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. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process. 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. New information submitted by SUWA was reviewed and it was found the new information was not significantly different; new information did not justify changing previous wilderness review findings and these units have no reasonable probability of wilderness values.	No
Southern Utah Wilderness Alliance	26	48	Arch Canyon 6 Unit – The commenter alleges that BLM only assessed this area based on size criteria alone and did not consider other information provided by the commenter.	Monticello BLM took into consideration the language of the 1964 Wilderness Act, and concluded that a size criterion is an important indicator of whether or not outstanding opportunities for solitude and or/ primitive recreation exist. Areas of less than 5000 acres are generally not large enough to provide for these opportunities. Areas less than 5,000 acres were	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				reviewed for Wilderness Characteristics, in general, the size criterion of 5,000 acres was applied only to units not contiguous with other federal lands previously determined to have wilderness characteristics. The BLM stands by its findings of its wilderness characteristics inventories and WCR process. The National Forest Service area in question has not been determined by that agency to possess wilderness characteristics (itself a BLM term), and its adjacency is irrelevant. New information submitted by SUWA was reviewed and it was found the new information was not significantly different; new information did not justify changing previous wilderness review findings and these units have no reasonable probability of wilderness values.	
Southern Utah Wilderness Alliance	26	49	Overall Comment – The commenter alleges that BLM has not been able to account for the wilderness values and characteristics for this unit. "Neither the BLM's late 1970's, the 1999 Utah wilderness Inventory and the Revision to this inventory, have made the identification of wilderness resources priority over the political interferences and biases of this area."	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. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process. 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.	No
Southern Utah Wilderness Alliance	26	50	Cheesebox Canyon Unit – The commenter states that BLM's only assessment of this area was during the "recent WCR."	The unit in question (White Canyon #2) was determined to lack wilderness characteristics in the 1999 inventory and also during the 2007 WCR process. BLM stands by its WC	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				determinations.	
Southern Utah Wilderness Alliance	26	51	Cheesebox Canyon Unit – The commenter states that the eastern boundary of the unit is the natural wash of Fry Canyon and not located on one of these multiple routes and does not account for the full extent of the natural character lands here.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 1999 Wilderness Re-inventory documentation, as well as the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	52	Cheesebox Canyon (White Canyon #1) Unit – The commenter states that BLM has yet to fully identify the extent of wilderness resources that exist in this unit.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 1979 Wilderness Inventory documentation, as well as the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	53	Cheesebox Canyon Unit – The commenter states that the BLM failed to mention that the unit is contiguous to the WIA area, which was shown to possess wilderness characteristics.	The BLM WCR process reviewed this unit specifically because it was contiguous to lands determined to possess wilderness characteristics during the 1999 Re-inventory process.	No
Southern Utah Wilderness Alliance	26	54	Cheesebox Canyon Unit – The commenter states that the BLM used arbitrary boundaries resulting in an incomplete account of the full extent of wilderness resources.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 2007	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	
Southern Utah Wilderness Alliance	26	55	Cheesebox Canyon Unit – The commenter states that the BLM did not properly create accurate boundary lines for this unit, and that it is actually adjacent to a 1999 WIA unit with WC.	BLM incorrectly stated that this unit is not contiguous to the 1999 WIA unit with WC. It is, in fact, contiguous; however, the unit contains multiple vehicle routes and evidence of mining activity, and thus does not meet the naturalness criteria for wilderness characteristic management. Therefore, the unit is determined to not possess wilderness characteristics.	Yes
Southern Utah Wilderness Alliance	26	56	Cheesebox Canyon Unit – The commenter states that the BLM never inventoried this area during the 1999 Re-Inventory process, or during the 2003 revision.	The unit was not inventoried during the 1999 Re-inventory or 2003 revision process; however, the unit was reviewed during the 2007 WCR process.	No
Southern Utah Wilderness Alliance	26	57	Cheesebox Canyon Unit – The commenter states that the BLM did not properly create accurate boundary lines for this unit.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	58	Comb Ridge Unit – The BLM has not accounted for the entire landscape within the Comb Ridge unit.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 1999 Wilderness Re-inventory documentation, and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Southern Utah Wilderness Alliance	26	59	Fish and Owl Creeks Unit – The commenter states that the BLM used arbitrary boundaries for this unit.	This unit was inventoried in 1999 and found not to have wilderness characteristics because of numerous bladed roads, range developments and woodcutting vehicle ways. As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 1999 Wilderness Re-inventory documentation, and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories.	No
Southern Utah Wilderness Alliance	26	60	Gravel and Long Canyons Unit - The commenter states that the BLM never inventoried this area during the 1999 Re-Inventory process, or during the 2003 revision.	This unit (White Canyon 7) was not inventoried during the 1999 Re-inventory or 2003 revision process; however, the unit was reviewed during the 2007 WCR process. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	61	Harts Point Unit, Comments A, B, C and D-The commenter states the BLM used arbitrary boundaries for this unit.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 1999 Wilderness Re-inventory documentation, and are available as part of the administrative record in the Monticello BLM Field Office. The 1999 Wilderness Re-inventory found this area to The BLM stands by its findings of its wilderness characteristics inventories.	No
Southern Utah Wilderness	26	62	Lockhart Basin Unit, Comment A – The commenter states "What happen to BLM's assessment of the Lockhart Basin wilderness character area? It was recently found by the	The Lockhart Basin area was found to have reasonable probability of having wilderness character in 2001. That area was not reviewed during the 2007 WCR because of this prior	Yes

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Alliance			BLM to have reasonable probability of having wilderness character (RPD), but within the DRMP and the background files, this area seems to have slipped through its proper wilderness character identification".	finding. WSA's and the 1999 WIA areas also were not reviewed under the 2007 WCR process. The WC finding has not changed, however it was not one of the areas carried forward for management of wilderness character in the proposed plan. The Lockhart Basin RPD area was inadvertently left off of the maps showing non-WSA areas with Wilderness Character in the draft, this oversight has been corrected in the PRMP.	
Southern Utah Wilderness Alliance	26	63	Lockhart Basin Unit, Comment B – The commenter states " Our field inventories do not confirm BLM's no wilderness character assessment, and besides the main route into Lockhart Basin, no other human feature within the area remains a significant impact affecting the entire area and landscape. The omission of this impressive are as having natural and wilderness characteristics needs correcting prior to the release of the Monticello or Moab Final RMPs".	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	64	Lockhart Basin Unit, Comment C - The commenter states BLM claims that there are no wilderness characteristics anywhere within this area and the BLM has yet to account for the wilderness character that is present.	The commenter submitted new information which was reviewed by the BLM. As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	65	Monument Canyon Unit – The commenter states "BLM has therefore yet to ever truly perform a warranted wilderness inventory to make today's claim that the area is no longer natural in appearance".	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				photographs. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	
Southern Utah Wilderness Alliance	26	66	Red Rock Plateau Unit – The commenter states the BLM has yet to fully identify the area's wilderness character, continually relaying on the initial assessment. The BLM WRC does not account for the entire landscape and arbitrary separates the Red Rock Character unit into three sub-units.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	67	San Juan River Unit – The commenter states that the BLM used arbitrary boundaries resulting in an incomplete account of the full extent of wilderness resources.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	68	Shay Mountain Unit – The commenter states that the "BLM does not account for the full range of lands retaining wilderness character". The commenter states that the southern and western areas, all contiguous with roadless Forest Service areas did not have an accurately performed wilderness characteristic review.	These areas, when inventoried in 1979, were found not to possess natural character and not to possess wilderness characteristics. These areas were reviewed in the 2007 WCR and found not to possess wilderness characteristics. As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process. The National Forest Service area in question has not been determined by that agency to possess wilderness characteristics (itself a BLM term), and its adjacency is irrelevant.	
Southern Utah Wilderness Alliance	26	69	Sheep Canyon Unit – The commenter states that the BLM needs to reviewed a small section west of the western boundary in order to obtain an accurate account of the full extent of wilderness resources.	The unit to which the commenter refers to was not been presented to the BLM as an area possessing wilderness characteristics until the date this comment was received. It is not part of the lands proposed for wilderness in HR-1500 and assessed in the 1999, 2003 Re-inventory process, or part of the new proposals analyzed in the 2007 WCR. The commenter provided no new information other than a map to support its assertion that previous inventories were in error.	No
Southern Utah Wilderness Alliance	26	70	The Needle Unit – The commenter states the BLM separates contiguous BLM lands from one another by creating an arbitrary line or point to point boundary. Then after the arbitrary boundary is delineated, the unit is not of sufficient size for a standalone unit. The BLM's WCR fails to account for the wilderness resources overwhelmingly present within the Needle area.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. This process allows the ID team to look at all resources during wilderness characteristics inventory maintenance. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The Needle area was inventoried during the initial inventory in 1979 and was not carried forward into the intensive inventory because it was determined not to be natural in character. This area was also not carried forward in the 2007 Wilderness Character Review. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Southern Utah Wilderness Alliance	26	71	The Tabernacle Unit – The commenter states that the BLM used arbitrary boundaries resulting in an incomplete account of the full extent of wilderness resources.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 1979 Wilderness Inventory documentation, as well as the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its wilderness characteristics inventories and WCR process..	No
Southern Utah Wilderness Alliance	26	72	Tin Cup Mesa Unit – The commenter states that once this unit has been reduced in size to exclude human disturbances, a natural area of greater than 5,000 acres still remains, and thus the BLM should have reviewed this unit for wilderness characteristics. New information for this unit was provided.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, Reasonable Foreseeable Development (RFD) data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM findings are described in the 1979 Wilderness Inventory documentation, as well as the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The new information was reviewed by BLM staff. The BLM stands by its findings of its wilderness characteristics inventories and WCR process.	No
Southern Utah Wilderness Alliance	26	73	Tin Cup Mesa Unit – The commenter states that “BLM’s WCR fails to account the adjoining Squaw and Papoose Canyon WSA is part of the larger Tin Cup Mesa wilderness character unit within the recent WCR.”	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. This unit was reviewed as a standalone unit due to its overall size (16,000 acres approximately), and thus the fact that it is contiguous to a WSA is not relevant. The BLM findings are described in the 2007 WCR process and are available as part of the administrative record in the Monticello BLM Field Office. The BLM stands by its findings of its	Yes

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				wilderness characteristics inventories and WCR process.	
Southern Utah Wilderness Alliance	26	74	Abajo Mountains Wilderness Character Units –The commenter states that "Surrounding the Forest Service lands of the Abajo Mountains exist several wilderness character units that have yet to be identified by the Monticello BLM ". These areas should not be excluded because they are adjoining and contiguous with the larger Forest Service Rare II areas. SUWA provides the Monticello BLM with supplemental and new information for the areas.	The National Forest Service area in question has not been determined by that agency to possess wilderness characteristics (itself a BLM term), and its adjacency is irrelevant. New information submitted by SUWA was reviewed and it was found the new information was not significantly different; new information did not justify changing previous wilderness review findings and these units have no reasonable probability of wilderness values.	No
Southern Utah Wilderness Alliance	26	75	The DRMP/EIS does not show a full range of travel types and modes, or other limitations sufficient to protect the resources at risk from ORV use.	The DEIS/RMP provides 5 alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, emphasis of commodity production and extraction and management of Non-WSA lands with wilderness characteristics. These alternatives provide a broad range of management actions to address the issues raised during scoping, including OHV use.	No
Southern Utah Wilderness Alliance	26	76	SUWA opposes any route designation within WSAs, even if the route in question is an "existing way".	The preferred alternative would allow conditional motorized use in four WSAs on 7 ways to provide access to trailheads. Where routes would remain available for motorized use within WSAs, such use could continue on a conditional basis. Use of the existing routes in the WSAs could continue as long as the use of these routes does not impair wilderness suitability, as provided by the IMP (BLM 1995). Refer to Chapter 2, page 2-55 for additional information.	No
Southern Utah Wilderness Alliance	26	81	The BLM should strengthen the Monticello Draft RMP by closing or imposing NSO stipulations on all proposed and existing ACECs and additional non-WSA lands with wilderness characteristics identified by SUWA in these comments.	The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Any Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				be managed according to the management prescriptions established in the RMP. These Non-WSA lands have many resource values and use in addition to wilderness characteristics. The DRMP/DEIS considered all available information and a range of alternative prescriptions for how these values and uses would be managed. The management and level of protection of ACECS is discretionary and a full range of alternatives is in the DRMP/DEIS.	
Utah State Office of Education	31	5	In the Affected Environment section, it should be stated that to the extent the BLM creates new areas managed for preservation, based on impacts to physical, biological, and cultural resources, such as ACECs or areas managed for "wilderness characteristics", such designation has a direct economic impact on the Utah school trust. For all school trust lands inheld in such areas, it will therefore become necessary to identify and make available lands, and acknowledge that each special designation will require an accompanying land exchange. Failure to provide a necessarily large pool of available economically productive lands for exchange will constitute an unconstitutional taking of the captured lands.	BLM acknowledges that the closure of adjoining public lands to oil and gas leasing may have a potentially negative impact on SITLA's mineral revenue. The assumption on pg. 4-3 has been changed to reflect this fact. In Alternative C, the closure of acreage managed as WSA or Wilderness Areas is nondiscretionary and beyond the scope of this plan. Chapter 4 of the PRMP/FEIS has been revised to reflect the impacts in Alternative E on SITLA inholdings of the discretionary closures of public land. It should be noted that under any Alternative, the proposed ACECs are not managed as closed to mineral leasing.	Yes
Maryland Ornithological Society, Inc	38	1	BLM has never completed a wilderness study of the areas in Table 3.19, so there has been no Interior Department recommendation for or against wilderness designation. America's Red Rock Wilderness Act (S. 1170), co-sponsored by four Maryland legislators among more than 170 nationwide, proposes all those areas for wilderness status. The final Monticello plan should incorporate the protection measures in Alternative E, namely closure to ORVs and mineral leasing and designation of qualifying lands as areas of critical environmental concern and wild and scenic rivers.	Table 3.19 on page 3-68 is in fact a Summary of Lands Evaluated for Wilderness Characteristics. Section 3.9 on page 3-67 details the process that was followed. Lands that are currently proposed for wilderness as part of S.1170, America's Red Rock Wilderness Act of 2007 have been reviewed for wilderness characteristics by the BLM. In the FEIS, the BLM has designated 74,403 acres as ACECs and 35.7 miles of river for inclusion into the Wild and Scenic River Program.	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Broads Healthy Lands	41	29	BLM fails in citing impacts that supposedly "significantly impact the area," even though these features and impacts are well outside the wilderness character units. The use of a "point to point" system to draw lines across wilderness units to artificially reduce the size, and thus the justification for, wilderness characteristics is as offensive now as it was in the 80's, and BLM deserves severe derision for this despicable practice. The most glaring example is that of White Canyon, in which the unit was divided in to 16 separate sections with no justification in a deliberate attempt to disqualify this outstanding area.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field knowledge, ID Team review, og-wells GIS data, range allotment files, and a review of BLM and San Juan County (SJ CO) GIS data, including 2006 high resolution aerial photographs. The BLM stands by its findings of its wilderness characteristics inventories and WCR process. Monticello BLM took into consideration the language of the 1964 Wilderness Act, and concluded that a size criterion is an important indicator of whether or not outstanding opportunities for solitude and or/ primitive recreation exist. Areas of less than 5000 acres are generally not large enough to provide for these opportunities. Areas less than 5,000 acres were reviewed for Wilderness Characteristics, in general, the size criterion of 5,000 acres was applied only to units not contiguous with other federal lands previously determined to have wilderness characteristics.	No
IPAMS(Independent Petroleum Assc of Mountain State	55	2	In Appendix O, page 2 it is mentioned that the BLM received new information from the Southern Utah Wilderness Alliance (SUWA) on WCAs. However, the SUWA information is not cited in the references section and is not in the background documentation available on the Monticello Field Office web site. This information should be readily available in order for the public to evaluate the legitimacy of the WCA proposals. IPAMS' experience in other planning areas is that the SUWA-provided data is very scant - a few maps or photos, but no in-depth analysis or supporting data for why the proposed wilderness areas deserve special designation and protection. We suspect the same is the case in the Monticello planning area. The BLM should make the data available, and give greater weight to the more detailed, thorough date provided by the country.	Information was received from the Southern Utah Wilderness Alliance regarding wilderness proposals both prior to, and during scoping. A reference to this information is made in Appendix O in the DRMP/EIS. This information is part of the administrative record for the land use planning process and is available to the public upon request.	No
EOG	60	50	On pages 4-153 through 4-155, the BLM must expressly provide that any special management of non-WSA lands	The land use plan makes decisions for new leasing actions. Valid existing rights (previous leases) are recognized	Yes

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Resources			cannot affect existing lease rights. See, e.g., National Wildlife Fed'n. et. Al., 150 IBLA 385, 403 (1999). The BLM may not modify valid existing lease rights through the revision of RMPs.	regardless of plan decisions.	
CrownQuest	62	2	CrownQuest is also concerned about the BLM's proposal to manage so-called "non-wilderness Study Area (WSA lands with wilderness characteristics" to maintain wilderness values. The Federal Land Policy and Management Act of 1976 (FLPMA) does not provide a justification, mandate, or process requirement for engaging in an ongoing wilderness inventory and review. Once the wilderness evaluation process required by Section 603 of the FLPMA was complete in the early 1990s, the BLM and the Department of the Interior were not required to conduct further wilderness inventories. 43 U.S.C. 1782; Utah v. Norton, 2006 WL 2711798, Civ. No. 96-CV-0870, *2, *8 (Sept. 20, 2006). The question of which lands should be included in the National Wilderness Preservation System is now reserved solely to Congress. Utah v Norton, 2006 WL 2711798, Civ. No. 96-CV-0870, *8 (Sept. 20, 2006). The BLM has not justified the need for managing additional lands for wilderness qualities.	The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). 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))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM is aware that there are specific State laws relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA requires that BLM's land use plans be consistent with State and local plans “to the extent practical” where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved. The BLM will identify these conflicts in the FEIS/PRMP so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. 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 those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.	
CrownQuest	62	21	The BLM has not adequately explained or justified the need for such large ROW exclusion areas or the need for ROW exclusion areas in the Squaw and Papoose Canyon and Cross Canyon non-WSA areas with wilderness characteristics, as proposed under Alternative E.	Appendix A gives the explanation for stipulations applicable to oil and gas leasing. 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	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				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. Alternative E was only one of those alternatives. 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.	
CrownQuest	62	27	The BLM has not adequately justified managing areas that were not included in the original WSAs for wilderness qualities. The BLM originally determined that such areas do not possess sufficient qualities for protection, and should not reverse course now by modifying the existing multiple use management in favor of preservation. See Monticello DRMP/EIS, pg 2-20.	Please refer to response to comment 62-2.	No
CrownQuest	62	28	In Appendix O of the Monticello DRMP/EIS, the BLM states that it received new information regarding alleged wilderness characteristics from the Southern Utah Wilderness Alliance (SUWA) concerning "several areas", but does not specify what that new information was or the areas to which it related. See Monticello DRMP/EIS, Appx. O, pg O-2. This information should be readily available to the public in order to assess the quality of the information.	Information was received from the Southern Utah Wilderness Alliance regarding wilderness proposals both prior to, and during scoping. A reference to this information is made in Appendix O in the DRMP/EIS. This information is part of the administrative record for the land use planning process and is available to the public upon request.	No
CrownQuest	62	29	Many of the non-WSA lands that supposedly have wilderness characteristics do not meet the criteria for wilderness, and should not be managed as wilderness and closed to oil and gas development. Human impacts can be seen throughout the areas, including active wells, plugged and abandoned wells, pipeline ROWs, roads, structures, and other imprints of human activity. In addition, many of the boundaries have been "cherry stemmed" to go around a road or other structure that would otherwise disrupt the continuity of the area, thereby making a mockery of the criterion for wilderness designation of 5,000 acres of	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. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process in the Administrative Record. The BLM is confident of high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			contiguous undisturbed land. This arbitrary drawing of boundaries enables the designation of wilderness in land that really by any common sense analysis does not meet the criterion of undisturbed land.	wilderness characteristics inventory maintenance. The BLM examined about 558,807 acres of lands proposed in the Red Rock Wilderness Act for the existence of wilderness characteristics. The BLM found that 266,485 acres of these lands contained wilderness characteristics and are proposed for protective management in Alternative B. The remaining 292,322 acres of the Red Rock proposal did not have wilderness characteristics based on the inventory maintenance conducted by the BLM between 1996 and 2007. Congress crafted the terms "outstanding opportunities for solitude" and "primitive or unconfined recreation" when it enacted the Wilderness Act of 1964. The BLM Washington Office Instruction Memorandum 2003-275 Change 1 defines these terms for the purposes of land use planning. In general, when the sights, sounds, and evidence of other people are rare or infrequent, where visitors can be isolated, alone or secluded from others, where the use of the area is through non-motorized, non-mechanical means, and where no or minimal developed recreation facilities are encountered can provide visitors with the opportunity for solitude or primitive or unconfined recreation. The economic impacts of managing non-WSA lands with wilderness characteristics were analyzed in Chapter 4 of the DRMP/EIS.	
CrownQuest	62	30	In the Monticello DRPM/EIS, the BLM does not indicate that it has reviewed the Squaw and Papoose Canyon and Cross Canyon non-WSA areas with wilderness characteristics since the 1999 inventory to determine whether the alleged wilderness characteristics still exist in light of changed resource uses in these areas. See Monticello DRMP/EIS, Appx, O.	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. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process in the Administrative Record. The BLM is confident of high-standard approach used to inventory the public lands and	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.	
CrownQuest	62	65	On page 2-113, under the resource Non-WSA Lands with Wilderness Characteristics, the BLM explains that managing over a half million acres of public lands for wilderness characteristics under Alternative E is "likely to have positive impacts on local economy with the potential for some socioeconomic losses due to restricted activities in these areas.	The analysis in Chapter 4 has been expanded to address the potential negative impacts of Alternative E on oil and gas development. The BLM believes that the impact would be minor in the context of the RFD, but nonetheless real. Whether the economic benefits from Alternative E will exceed the economic costs is impossible to determine with available data.	Yes
CrownQuest	62	66	This statement is completely unsubstantiated and misleading. The statement suggests that managing lands for wilderness characteristics under Alternative E may yield positive economic impacts that outweigh the negative economic impacts that will result from closing these lands to other resource uses such as oil and gas development. The analysis set forth in Chapter 4 of the Monticello DRMP/EIS does not support the conclusion that Alternative E will yield positive economic benefits. The BLM provides absolutely no evidence to support its speculation that closing non-WSA lands to development will generate revenue for the local economy or, moreover, that any positive effects would offset the revenue lost by closing the area to oil and gas development. In Chapter 4, the BLM admits that it cannot quantify any potential economic impacts from managing additional lands for wilderness characteristics.	Please refer to response to comment 62-65.	No
CrownQuest	62	67	Without such quantification, it is impossible for the BLM to suggest that closing lands for wilderness character may create positive economic impacts that will outweigh lost revenue from other resource uses such as oil and gas development.	Please refer to response to comment 62-65	No
Charles Bagley	97	1	As you, yourselves, cite in Appendix O1.2, the current BLM Land Use Planning Booklet, 2005, states that land use plans must, "Identify decisions to protect or preserve wilderness	Under at least one alternative in the DRMP/DEIS, all lands identified by BLM as having wilderness characteristics would be managed to protect the naturalness of the areas and the	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			characteristics….Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives.	opportunities for solitude and primitive recreation. Protecting the wilderness characteristics would include, among other restrictive management prescriptions, making them unavailable for oil and gas leasing and closing the area to OHV use. The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). However, the BLM may manage the lands to protect and/or preserve some or all of those characteristics through the land use planning process. In addition, under the land use planning process, the BLM must consider a range of alternatives for the lands identified 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.	
Carl Mach	116	1	The Draft RMP fails to adequately address protection of wilderness-quality lands in its range of alternatives. The plan proposes to protect none of the 582,360 acres outside of the Wilderness Study Areas (WSAs) that BLM's own inventory identified as possessing wilderness characteristics. The preferred alternative also fails to designate appropriate Areas of Critical Environmental Concern ACECs and Wild & Scenic River segments. To properly manage the many resources of the Monticello Resource Area, BLM should incorporate protection for lands with wilderness characteristics and heritage sites into the final plan, no matter the alternative is chose. Specifically, BLM should take the following actions: -- Include protection of lands with wilderness characteristics in all of the proposed alternatives. Protecting wilderness-	Please refer to response to comment 97-1.	No

WC – Wilderness Characteristics					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
			quality lands, increasing the number and acreage of ACECs, and protecting additional Wild and Scenic River segments would still leave plenty of land open to motorized use and oil and gas development. -- Close areas rich in cultural heritage sites, such as Arch and Recapture Canyons, to ORV use, which puts these irreplaceable archeological treasures at increased risk of vandalism and looting.		
Utah 4 Wheel Drive Association	217	1	Regarding definition of Non-Wilderness Areas with Wilderness Characteristics on BLM managed lands, given that Congress rightly expected continued existing motorized use in WSAs, there is no legal basis by which the BLM can exclude motorized use by including a new category for Non-Wilderness Areas with Wilderness Characteristics. Designating an area as defacto Wilderness by any other name and managing it as such is not within legal scope assigned to the BLM. Areas deemed in need of Wilderness protection should be presented to Congress for consideration through the established public review and comment procedures.	The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). 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©(2) (43 U.S.C. §1712©(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© (43 U.S.C. §1702©)) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations.	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM is aware that there are specific State laws relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA requires that BLM's land use plans be consistent with State and local plans “to the extent practical” where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved. The BLM will identify these conflicts in the FEIS/PRMP so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options.	
Glen Canyon Group, Utah Chapter, Sierra Club	221	1	The Draft RMP/EIS fails to give due consideration to Non-WSA Lands with Wilderness Characteristics. Alternative E appears to have been an add-on. Nowhere in the entire document are the individual Lands--listed in Table 3.19 on pages 3-98 through 3-70, actually incorporated into any of the other action alternatives or land use decisions. According to Appendix O, the current BLM Land Use Planning Handbook (H-1601-1,2005) states that land use plans must: Identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for	Please refer to response to comment 97-1.	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			solitude, and outstanding opportunities for primitive and unconfined recreation).		
Glen Canyon Institute	222	3	The BLM has identified 29 areas encompassing 582,360 acres of "non-WSA lands with wilderness characteristics" (emphasis added; p. 2.6, 4-149, 4-150). Many of these areas about the boundary of Glen Canyon NRA, other national parks, and WSAs, and are included in America's Red Rock Wilderness Act (Map 28). The DRMP would open virtually all of these potential wilderness areas to full scale industrial exploitation (p. 2-20, 4-165, 4-187 to 189, 4-193, 4-217 to 219). Changes Needed in the Final Resource Management Plan 1. Administratively protect all 29 non-WSA areas identified as having wilderness characteristics, to safeguard their ecological, cultural, and recreational values, until wilderness designation can be resolved by Congress. To not do so would be to violate the intent and objective of the proposed legislation and intent of BLM administrative direction.	Please refer to response to comment 97-1.	No
Form Letter 1	FL1	1	I have just learned about the proposed management plans for 11 million acres of public land in Utah, and I am deeply distressed about the scale and scope of oil and gas development and off-road vehicle (ORV) use BLM is proposing within proposed wilderness areas. While legislation to grant permanent protection of these precious areas is gaining bipartisan support in Congress, you are pushing forward with plans that will disturb a fragile ecosystem and sacrifice our natural and historical heritage.	The commenter's preferences for managing non-WSA lands with wilderness characteristics are noted. Many of the areas mentioned in the comment are not within the Monticello field Office planning area.	No

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			At risk are roadless areas near Canyonlands, Zion and Arches National Parks, with iconic red sandstone spires, 1,000-foot cliffs, high plateaus and meandering, narrow canyons, and spectacular stretches of the Colorado, Dolores, and Green Rivers. Rock carvings in the Price district are more than a thousand years old, and the Vernal district boasts ancient cultural artifacts and dinosaur fossils. Also at risk are critical habitats for a wide range of wildlife, and recreational activities like backpacking and rafting. BLM found the vast majority of these lands to have wilderness character, and yet is failing to protect these special areas in its proposed management plans. I urge you to reconsider your plans for extensive drilling and ORV use in these areas, which are some of the most spectacular in the United States. The damaging nature of these activities makes them wholly unsuitable for Areas of Critical Environmental Concern, Wilderness Study Areas, and other citizen-proposed wilderness lands.		
Form Letter 4	FL4	1	Thank you for the opportunity to comment on the BLM's Monticello Field Office Draft Resource Management Plan (RMP). The Monticello Resource Area boasts some of the most extraordinary ancient cultural sites in Utah, including granaries, cliff dwellings, and rock art. Here, one can still enjoy undeveloped vistas and find solitude in remote, seldom-visited canyons. Unfortunately, many areas in the Monticello region are at risk to damage from oil and gas development and off-road	The Proposed RMP/FEIS manages around 89,000 acres of non-WSA lands to protect, preserve and maintain their wilderness characteristics.	No

WC – Wilderness Characteristics				
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			vehicle (ORV) use. The BLM must revise its Draft RMP in order to adequately address protection of wilderness-quality lands and ancient cultural artifacts. These public lands should provide permanent protection to the irreplaceable resources that are located here. Specifically, the Draft RMP fails to adequately address protection of wilderness-quality lands in its range of alternatives. The plan proposes to protect none of the 582,360 acres outside of the Wilderness Study Areas (WSAs) that BLM's own inventory identified as possessing wilderness characteristics. The preferred alternative also fails to designate appropriate Areas of Critical Environmental Concern (ACECs) and Wild & Scenic River segments. To properly manage the many resources of the Monticello Resource Area, BLM should incorporate protection for lands with wilderness characteristics and heritage sites into the final plan, no matter which alternative is chosen. Specifically, BLM should take the following actions: -Include protection of lands with wilderness characteristics in all of the proposed alternatives. Protecting wilderness-quality lands, increasing the number and acreage of ACECs, and protecting additional Wild and Scenic River segments would still leave plenty of land open to motorized use and oil and gas development. -Close areas rich in cultural heritage sites, such as Arch and		

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Recapture Canyons, to ORV use, which puts these irreplaceable archeological treasures at increased risk of vandalism and looting. -Motorized routes should not be designated in citizen-proposed wilderness areas, inventoried roadless areas, critical and sensitive wildlife habitats, riparian areas, or in sensitive soils. -Vehicles should be restricted to designated roads and trails throughout the entire resource area. In order to facilitate enforcement, there should be a "closed unless signed open" policy. Redundant or environmentally damaging routes should be eliminated. The best management alternative for the diverse resources of the Monticello area is offered by the Redrock Heritage Plan, submitted to BLM by the Southern Utah Wilderness Alliance. BLM should adopt this alternative. Regardless which alternative is adopted, it is critical that BLM incorporate the suggestions above. Thank you.		
Form Letter 5	FL5	1	I am writing to comment on the Monticello Draft Resource Management Plan and Environmental Impact Statement (DRMP). I strongly oppose Alternative C, the "Preferred Alternative." I urge the BLM to reject this alternative and to use Alternative E as the basis for developing a more balanced and sustainable Final Resource Management Plan (FRMP). I am a frequent visitor to the areas noted in the management	The Proposed RMP/FEIS manages around 89,000 acres of non-WSA lands to protect, preserve and maintain their wilderness characteristics. The presence of routes within WSAs does not preclude their inclusion in the wilderness system. The commenter’s management preferences are noted.	No

WC – Wilderness Characteristics				
Commenter Name	Record ID & Comment Number	Comment Text	Response to Comment	Doc Mod
		plan and have enjoyed backpacking, camping, wildlife observatio, and above all, peace. Many of the proposed plan's elements would make those outdoor activities much less enjoyable. For example: 1. The DRMP would allow off-road vehicles (ORVs) to use routes on portions of identified Wilderness Study Areas (WSAs). The FRMP must ban ORVs from all WSAs until the Congress has had a chance to decide on their designation in America's Red Rock Wilderness Act. 2. Under the DRMP, ORVs would be able to crisscross most of the area on 1,947 miles of motorized routes. The FRMP must greatly reduce ORV routes, including closing all of them in and next to special areas such as "non-WSAs with wilderness characteristics," suitable Wild and Scenic River segments, nominated and eligible ACECs, and lands next to national park areas. 3. The DRMP provides no protection for the 29 "non-WSAs with wilderness characteristics" in the planning area. The FRMP should provide the same protection for these areas that it gives to WSAs, until the Congress has had a chance to decide on their designation in America's Red Rock Wilderness Act. 4. Only 18.4 miles of Wild and Scenic Rivers are recommended in the DRMP. The FRMP needs to recommend Wild and Scenic River designation for all 92.4 miles of river that were found to be suitable by the BLM.		

WC – Wilderness Characteristics				
Commenter Name	Record ID & Comment Number	Comment Text	Response to Comment	Doc Mod
		5. Although the BLM found 12 areas, totaling 521,141 acres, to be eligible for Area of Critical Environmental Concern (ACEC) status, the DRMP only designates 3 small areas. The FRMP should designate all 12 areas as ACECs to protect their important historic, cultural, scenic, fish and wildlife, and other values. 6. The DRMP opens most of the planning area to destructive oil, gas, and mineral extraction. The FRMP needs to prohibit these activities in and next to WSAs and other special areas such as "non-WSAs with wilderness characteristics," suitable Wild and Scenic River segments, nominated and eligible ACECs, and lands next to national park areas. 7. Livestock grazing would be allowed almost everywhere under the DRMP, even though it degrades soils, vegetation, wildlife habitat, air and water quality, and recreational values, and is subsidized by the public. The FRMP should phase out grazing in WSAs and other special areas such as "non-WSAs with wilderness characteristics," suitable Wild and Scenic River segments, nominated and eligible ACECs, and lands next to national park areas. 8. Global climate change is one of the most serious challenges facing the world, yet the DRMP completely ignores the impact of climate change on the southwest. The FRMP needs to thoroughly analyze the impacts of climate change on the planning area and the potential impacts of proposed activities on climate change. 9. The BLM has provided far too little time for the public to review and comment on the massive and detailed Monticello		

WC – Wilderness Characteristics					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			DRMP. The BLM must extend the comment period so more citizens have the opportunity to learn about and provide input on this important management plan. Again, I urge the BLM to reject the inadequate Alternative C as the Monticello DRMP's Preferred Alternative, and to develop a truly balanced alternative that is based on the Alternative E. Thank you for the opportunity to comment. Please let me know about any future information, actions, or opportunities to comment on the Monticello RMP.		

WD – Woodlands					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
San Juan County	7	56	Pg. 2-62 - Opportunities for woodland harvest under Alternatives A, B, C and D are 73%, 41%, 47% and 31%, respectively. San Juan County is concerned about the drastic reductions in lands available for woodland harvest and the impact on citizens who depend on these woodland products, especially on Cedar Mesa and other areas where Native Americans have traditionally gathered wood. The County suggests that BLM give this use more consideration in the final RMP.	The RMP has been revised that allows woodland harvesting in areas not identified as a harvesting zone, thus increasing available localities. Areas of historic woodland harvest will essentially continue to be available. Areas closed to woodland harvest are typically limited to areas devoid of woodlands, sites with no access to woodland products, Wilderness Study Areas, and riparian communities. The RMP language for Cedar Mesa and the Montezuma Watershed zones has been revised to allow the continuation of existing woodland harvest in the interim of designating woodland harvest areas and completing associated cultural surveys, so long as vehicles remain on designated routes.	Yes

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
U.S. Fish and Wildlife Service	2	25	Page 4-422 in section 4.3.15.1. In the third paragraph: "The installation of power poles would increase raptor predation...." The "would" should be changed to "may".	The change has been made to the document.	Yes
U.S. Fish and Wildlife Service	2	28	Page 4-426 in section 4.3.15.1. In the third paragraph it states: "In occupied priority migratory bird habitat..." The document should describe how this habitat will be delineated.	A sentence has been added to this section to discuss how these areas will be determined. "Occupied priority migratory bird habitat will be determined with the use of Utah Partners in Flight Avian Conservation Strategy, Intermountain West Joint Venture Bird Habitat Conservation Areas, and other migratory bird conservation plans."	Yes
U.S. Fish and Wildlife Service	2	33	Page 4-555 in section 4.3.19.1. In the second paragraph, the document states that wildlife species associated with the most common habitats would be affected most by surface disturbances. This may be true from the standpoint of total acres of habitat; however, it is also possible that species occurring on less common habitats could be disproportionably affected (e.g. riparian).	The BLM does not disagree that species occurring on less common habitats could be disproportionally affected, especially in riparian habitat. Riparian resources are discussed in depth on Page 4-312 in section 4.3.11.	No
U.S. Fish and Wildlife Service	2	35	Page 4-556 in section 4.3.19.1. The FWS has developed a list of conservation measures for migratory birds that should be included in this document. These conservation measures would be applicable to this section and would serve as an appendix and BLM could add additional species and conservation measures to the existing ones.	On Page 2-59 in Table 2.1, states that the BLM will comply with the Migratory Bird Treaty Act (MBTA) and implement the Executive Order 13186 ("Responsibilities of Federal Agencies to Protect Migratory Birds") during all activities to protect habitat for migratory birds. By complying with the MBTA, BLM would incorporate conservation measures for migratory birds as outlined in the Memorandum of Understanding that the BLM is required to enter into with the FWS. Although not specifically outlined in the EIS, conservation measures will be used for all future site specific projects.	No
U.S. Fish and Wildlife	2	36	Page 4-575 in Table 4.204. FWS recommends the method be described which was used to calculate the number of	An explanation has been added to the bottom of the tables to explain the methods used to calculate the number of acres	Yes

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Service			acres derived in this table.	derived in this table.	
U.S. Fish and Wildlife Service	2	6	Wildlife and Fisheries resources could be included in the discussion under Fire Management as there may be beneficial or adverse impacts to wildlife and fisheries from the alternatives associated with these alternatives.	BLM agrees that there may be beneficial or adverse impacts to wildlife and fisheries from fire management decisions. They are discussed on page 4-571 under 4.3.19.3.6 - Impacts of Fire Management Decisions on Wildlife and Fisheries.	No
U.S. Fish and Wildlife Service	2	7	Wildlife and Fisheries Resources should be included in the discussion under Livestock Grazing as there may be beneficial or adverse impacts to wildlife and fisheries from the alternatives associated with livestock grazing.	BLM agrees that there may be impacts to wildlife and fisheries from livestock grazing. They are discussed on page 4-573 under 4.3.19.3.8 - Impacts of Livestock Grazing Decisions on Wildlife and Fisheries.	No
U.S. Fish and Wildlife Service	2	8	Seasonal restrictions for wildlife do not address habitat loss or alteration from oil and gas or mineral development which should be considered in the analysis.	BLM agrees that although seasonal restrictions protect direct impacts to wildlife, there is a secondary impact from the loss of habitat associated with mineral decisions. They are discussed on pages 4-437 to 4-445 under 4.3.15.2.6 - Impact of Mineral Decisions on Special Status Species and pages 4-574 to 4-584 under 4.3.19.3.9 - Impacts of Mineral Decisions on Wildlife and Fisheries. Using this information in conjunction with Section 4.3.17.2.5 - Impacts of Mineral Decisions on Vegetation which provides acreage of each vegetation type in each reasonable foreseeable development area for each alternative would give an estimate of the potential type of habitat loss due to mineral development. On page 3-47 under 3.8.2 Leasable Minerals discusses past, present, and foreseeable future development for all minerals. Without knowing exactly where development may occur, the only analysis available to the BLM at this scale is what type of vegetation and wildlife occur in these areas and potential impacts. Site specific analysis would be conducted when proposals with exact locations are submitted.	No
National Park Service Intermountain	3	8	The NPS requests an opportunity to participate in planning and implementation of actions that affect wildlife or fish that may range into NPS units, such as predator control, animal	BLM manages wildlife habitat on public lands and UDWR manages wildlife in the State of Utah through various actions including those listed. BLM has stated in Chapter 2 that BLM and UDWR strive to work together to ensure consistent	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Region			damage control, transplantation, etc.	management and reduce conflicts for all resources including wildlife. The public and other agencies have an opportunity to comment on projects requiring BLM approval.	
State of Utah	4	11	The state requests that the BLM use the “crucial habitat” designations mapped by the DWR solely as descriptive wildlife habitat designations, not as automatic exclusion zones for other multiple uses.	BLM has changed the document to use the crucial habitat designations of UDWR. Use of these habitat polygons does not automatically exclude other uses. Appendix A outlines exceptions, modifications and waivers that will be used when applicable for all surface disturbing activities in these areas.	Yes
State of Utah	4	12	The state requests that habitat designations not be altered from alternative to alternative.	As required by NEPA, the BLM considered a range of alternatives. For non-special status species the alternatives varied by the size of the habitat and the timing restrictions. The management of habitat is consistent with the goals and objectives of each alternative. In the Draft RMP/EIS, Alt B has a timing limitation for what is referred to as "winter habitat." This habitat actually includes both crucial and high value winter habitats. These habitats, although not separated in the draft, have been properly described in the PRMP/FEIS.	No
State of Utah	4	88	The state requests that the BLM not alter habitat designations from alternative to alternative. The proper description of crucial winter habitats should occur regardless of alternative. The alternatives should then describe different levels of impact to these habitats.	Please refer to response to comments 004-11 and 004-12.	No
State of Utah	4	89	The Monticello RMP should be consistent with the newly developed Utah Wildlife Action Plan (UWAP). As a cooperator in developing this plan, the BLM should acknowledge it as the guideline for sensitive species management in the State of Utah. On page 2-51, it states the "BLM would work with the UDWR to implement the Utah Comprehensive Wildlife Conservation	This reference has been changed from the Utah Comprehensive Wildlife Conservation Strategy to the Utah Wildlife Action Plan.	Yes

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Strategy to coordinate management decisions that would conserve native species and prevent the need for additional listings."		
State of Utah	4	92	Alternative C. The state encourages the BLM not to permit the use of toxicants to control prairie dogs except within 100 m of irrigated fields and pastures.	The use of toxicants to control prairie dogs would be considered on a site-specific basis and the state would be consulted at such a time.	No
State of Utah	4	93	Alternative C. To protect western yellow-billed cuckoos and southwestern willow flycatcher's habitat, the BLM should make a commitment in the RMP to locate designated campsites between Montezuma Creek and Bluff so that riparian wildfires are less likely to be started by campfires.	Fire pans are currently required along the river and BLM does follow all fire ordinances. The BLM is planning on developing a San Juan River Plan in the future and designated campsites would be considered during this site specific document.	No
State of Utah	4	95	The BLM needs to address how to avoid, reduce, and mitigate impacts from uranium mining on wildlife and their habitat in the RMP because voluntary mitigation efforts will be inadequate.	The BLM does not rely exclusively on voluntary mitigation to address impacts from uranium mining. Section 302 of FLPMA requires the BLM to prevent unnecessary or undue degradation of the public lands. Regulations at 43 CFR Subpart 3809 establish procedures and standards to ensure that operators and mining claimants meet this responsibility for operations authorized by the mining laws. All operations must meet the performance standards at 43 CFR 3809.420 including, measures to rehabilitate fisheries and wildlife habitat and measures to prevent adverse impacts to threatened or endangered species, and their habitat. Site specific environmental analysis is done for proposed mining operations and appropriate mitigation measures are attached as conditions of approval. Consistent with the mining laws, operations and post-mining land use must comply with the RMP management prescriptions (table 2.1., Page 2-19).	No
State of Utah	4	96	The BLM should refer to the USFWS document Interim	Future wind energy projects would be analyzed on a site	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines and consult with UDWR and USFWS about future wind energy development.	specific basis and consultation with UDWR and USFWS would be done at that time. As stated in table 2.1 page 2-16, "Authorization of wind energy development would incorporate best management practices and provision contained in the Wind Energy Programmatic EIS, once this document becomes final."	
State of Utah	4	97	The state recommends that the BLM develop a long-term plan for mineral extraction and wildlife mitigation within the area covered by this RMP.	According to Washington Office Instruction Memorandum 2005-069, the BLM may identify off-site mitigation opportunities to address impacts of the project proposal, but is not to carry them forward for detailed analysis unless volunteered by the applicant.	No
State of Utah	4	98	The state recommends that the RMP require adequate mitigation (including off-site mitigation where appropriate) in all mineral leases that result in long-term impacts to crucial wildlife habitats.	The state cites no specific failures in the DRMP/EIS concerning onsite mitigation of impacts to crucial wildlife habitats. BLM's policy for the use of compensatory offsite mitigation for authorizations issued in the oil and gas program is contained in IM No. 2005-069. That policy states that the BLM will approach compensatory mitigation "on a voluntary basis where it is performed offsite." In its NEPA analysis, the BLM may identify other offsite mitigation opportunities to address impacts of the project proposal but should not carry them forward for detailed analysis unless volunteered by the applicant. Omission of discussion in the land use plan does not prohibit consideration of offsite mitigation at the project development phase.	No
State of Utah	4	99	The state requests that this RMP consider impacts to hunting and fishing from energy development.	Hunting and fishing is considered a recreational activity and although it is not specifically mentioned; the impacts to hunting and fishing from energy development is discussed under 4.3.10.3.8 Impacts of Mineral Decisions on Recreation.	No

WL – Wildlife					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Ute Mountain Ute Tribe	6	10	The Tribe generally favors designation of mule deer winter range and protection of elk habitat. Hunting of deer and elk is an important part of the culture and traditions of the White Mesa community.	The Ute Mountain Ute Tribe's support for wildlife habitat protections is noted.	No
San Juan County	7	13	BLM erroneously uses the term critical habitat for wildlife habitat that does not apply to endangered species act. The term crucial habitat is used too loosely; UDWR uses crucial habitat as descriptive designations. They are not intended to mislabel resource concerns and result in a limitation of compatible uses. San Juan County disputes the acreage identified for crucial elk and deer winter range in San Juan County and submits information from Dr. Charles Kay in that regard.	The critical habitat term has been changed to crucial in the final RMP/EIS. The UDWR is the jurisdictional agency for wildlife management within the State. The BLM relied on the expertise of this agency for delineating wildlife habitats, estimating population numbers, and recommending wildlife restrictions.	Yes
San Juan County	7	14	The BLM cites Sawyer et al. (2006) as the basis for its discussion of deer and elk habitat fragmentation, including maps 61 thru 65 and 69 thru 72. The County contacted the lead author of the study for his response to the study's applicability in San Juan County. Based on the author's written comments the County questions BLM's use of the referenced study. The County suggests that fragmentation maps for deer and elk along with the references thereto be removed and not included in the final RMP/EIS. The misuse of this scientific study raises questions about other studies, particularly the Desert Sheep Habitat Fragmentation Analysis based on Singer et al. (2001) as presented in Table 4.216 on page 4-600. The County cautions BLM about using scientific studies inappropriately.	The fragmentation analysis is not an attempt to quantify specific impacts from site specific project but is presented to analyze the degree of habitat fragmentation under each alternative. GIS models were based on the BLM's best available information. These models address fragmentation differences between alternatives on a landscape level. The BLM acknowledges that the study may not fit the situation entirely as stated in Section 4.3.19.2.19, "The impacts of habitat fragmentation on various animal species are difficult to quantify. Even with site-specific, peer-reviewed ecological research on the impacts to particular wildlife species from habitat fragmentation, many variables that contribute to the severity of the impacts to nearby wildlife remain difficult to predict."	No
San Juan County	7	42	Pg. 2-29 - In some instances such as Bridger Jack Mesa, timing and other restrictions apply to OHVs to protect wildlife/raptors but the same restrictions do not apply to rock climbers. The County requests BLM to clarify this apparent inconsistency.	In areas, such as Indian Creek and Bridger Jack Mesa where there are rock climbers; BLM conducts annual raptor surveys and have closed portions of the climbing areas to protect raptors.	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				On Page 2-60 in Table 2.1 it states to "Temporarily close areas (amount of time depends on species) near raptor nests to rock climber or other activities if activity may result in nest abandonment."	
San Juan County	7	43	Pg. 2-31 - San Juan County feels that restrictions imposed in wildlife areas are excessive and not supported by best science. In particular, road use should be allowed unless impacts can be shown.	All surface restrictions imposed in wildlife areas have exceptions, modifications, and waiver languages that allows for flexibility and use of current situations and science when making a site-specific decision (see Appendix A).	No
San Juan County	7	53	Pg. 2-54 and 2-56 - San Juan County is opposed to any alternative in the Monticello RMP/EIS which closes any portion of the Arch Canyon road. Reasons for the County's opposition include: 1) the Flannelmouth Sucker is not found above the State Section (T. 37 S., R. 10 E., Section 16). Therefore there is no justification to close the Arch Canyon road to protect this species above the State Section; 2) The stream is in proper functioning condition and BLM surveys have found no evidence that the Flannelmouth Sucker is being impacted by the road or its use; 3) The two primary reasons for listing the MSO, as described by the USFWS in its final rule dated August 31, 2004, are not major threats in the portion of Arch Canyon located on BLM lands; 4) In its final rule, the USFWS also described important habitat conditions for the MSO, all of which are much more prevalent on the Forest Service lands than on the BLM lands; 5) The portion of Arch Canyon on BLM land is near the fringe of the habitat for the MSO as mapped by the USFWS and would appear not to be as important for the survival of the owl; 6) The BLM is proposing to allow hikers unrestricted access in Arch Canyon. The County requests an explanation of BLM's rationale for allowing hikers to hike and camp both on the road and	Comment noted. The proposed travel plan has been adjusted. Even if the flannelmouth sucker is not found above the state section, it does not preclude management of the stream and watershed above the fish since activities that happen upstream will directly impact fish that live downstream. The endangered species act does not preclude the protection of species simply because the proposed action is not included as one of the primary reason for the need of a species to be listed. Arch Canyon is included in the Designated Critical Habitat for Mexican spotted owls and habitat evaluations have determined that Arch Canyon is suitable habitat for spotted owls. As stated in table 2.1 on Page 2-54, the BLM also analyzed a permit system to restrict the number of hikers in Alternative B and C.	Yes

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			throughout the canyon and cliffs while proposing to close the road to OHV use.		
San Juan County	7	55	Pg. 2-60 - San Juan County cannot support any of the management alternatives for wildlife because of its concerns on crucial habitat acreage. The County would welcome an opportunity to discuss this with BLM and see if adjustments can be made.	Please refer to response to comment 007-13.	No
San Juan County	7	58	Pg. 3-164, section 3.20.2.1 - It is generally agreed that in southeast Utah the limiting factor for mule deer is summer range, not winter range as stated by BLM. The County suggests that BLM correct this in the Final RMP.	The sentence, "Winter range is often considered a limiting factor for mule deer." will has been removed and replaced with the following clarification. "In the summer months, mule deer populations could be limited during years where there is little rainfall, water availability, and summer forage which reduces fawning success. In the winter months, insufficient quantity or quality of habitat or deep snow results in heavy concentration of deer on winter ranges, increasing the spread of disease, reduction in population, and fawning success."	Yes
San Juan County	7	59	Pg. 3-164 - The County points out that BLM's statement that "Within the Monticello PA, there has been a loss/die-off of sagebrush habitat due to drought and insect infestations" is only partially correct. The County references Charles E. Kay's studies in Beef Basin which show that sagebrush loss/die off is due primarily to deer overgrazing. Overgrazing by deer can also stress sagebrush and make it more susceptible to drought and insects.	The sentence has been modified to: "Within the Monticello PA, there has been a loss/die-off of sagebrush habitat due to drought, insect infestations, and overgrazing."	Yes
San Juan County	7	60	Pg. 3-164, Table 3.60 - The County requests BLM's justification for tripling the deer population given the condition of the crucial habitat in Beef Basin and Harts Draw.	Please refer to response to comment 007-13.	No
San Juan County	7	61	Pg. 3-166, section 3.20.2.4 - The County agrees with BLM's description of Desert Bighorn Sheep habitat. However, based on that description, the County questions how BLM can reconcile the large acres of thick pinyon-juniper areas included as crucial Bighorn Sheep habitat (Map 54 and 73 thru 76).	Please refer to response to comment 007-13.	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
San Juan County	7	62	Pg. 4-538 - Tables 4.194, 4.195, 4.196 and 4.197 show huge acreage of pinyon-juniper that will be protected for special wildlife conditions for deer, elk, pronghorn, and bighorn sheep. The BLM should reconcile why special conditions exist in this area given that the encroachment of pinyon-juniper has resulted in the loss of crucial habitat for these species.	Please refer to response to comment 007-13.	No
Southern Utah Wilderness Alliance	26	16	The existing condition should include the impact of ORV use on wildlife and wildlife habitat.	The impacts of travel on wildlife are discussed in Chapter 4 (pages 4-556-558) of the DRMP/EIS. In all action alternatives, motorized travel in riparian areas is reduced. In fact, Alt-A has nearly 611,310 acres to cross country travel. Whereas, in Alt-C only has 2,311 acres open to cross country travel.	No
Southern Utah Wilderness Alliance	26	112	The DRMP/EIS does not provide a sufficient analysis of the effects of habitat fragmentation.	The fragmentation analysis is not an attempt to quantify the specific impacts from the fragmentation that has or will result from existing or new road use and energy exploration and development, but is rather a tool to understand the differing impacts among alternatives for future habitat fragmentation. Habitat fragmentation is one of many factors that play an important role in wildlife management decisions. Site specific impacts from future activities will be analyzed and when applicable, stipulations and mitigation measures may be implemented. The models were removed from the analysis since there was little difference by alternative and the study does not entirely fit the situation.	No
Southern Utah Wilderness Alliance	26	113	The DRMP/EIS does not present alternatives that would provide sufficient unfragmented habitat.	DRMP/EIS provides a range of alternatives for the protection of wildlife habitats. Though fragmentation has been widely documented as causing an array of impacts to wildlife and their habitats, an alternative designed to provide totally	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				unfragmented habitat is not a feasible and reasonable alternative. Fragmentation is an existing condition of wildlife habitat. To ensure that all federally listed, state sensitive, and big game species received adequate protective measures to protect habitats used for breeding, migration and the rearing of young, the BLM worked closely with the United States Fish and Wildlife Service and the Utah Division of Wildlife Resources to developed controlled surface use stipulations, seasonal and spatial buffers, habitat restoration plans and other measures that support Recovery Plans, Conservation Agreements, Conservation Plans and Recommendations, and Herd Management Plans. Other wildlife species, though not specifically addressed in the DRMP/EIS, will also benefit from the many management prescriptions in the preferred alternative.	
Southern Utah Wilderness Alliance	26	114	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.	Chapter 4 of the DRMP/EIS acknowledges the benefits of management to protect wilderness characteristics. Alt E manages all non-WSA lands with wilderness characteristics to protect their natural values, including wildlife habitat. The DRMP/EIS provides a reasonable range of alternatives to protect habitat. In addition to those lands managed for wilderness characteristics, the Monticello planning area includes WSAs which also provide unfragmented habitats for wildlife species.	No
Southern Utah Wilderness Alliance	26	117	DRMP does not account for potential loss to species that are not yet considered special status species, nor realize the full threat to already designated special status species.	To ensure that all federally listed, state sensitive, and big game species received adequate protective measures to protect habitats used for breeding, migration and the rearing of young, the BLM worked closely with the U.S. Fish and Wildlife Service and the Utah Division of Wildlife Resources to developed controlled surface use stipulations, seasonal and	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				spatial buffers, habitat restoration plans and other measures that support Recovery Plans, Conservation Agreements, Conservation Plans and Recommendations, and Herd Management Plans. Other wildlife species, though not specifically addressed in the DRMP/EIS, will also benefit from the many management prescriptions in the preferred alternative. Wildlife impacts would also be analyzed on a site-specific basis for future projects.	
Southern Utah Wilderness Alliance	26	118	DRMP does not take proper measures to identify species of concern in affected areas; their populations, needs, and habits are not thoroughly understood.	In section 3.16, the 11 federally listed species and 58 BLM Sensitive Species were identified along with their habitat, status, and area of potential and/or known occurrence. BLM works closely with the U.S. Fish and Wildlife Service and the Utah Division of Wildlife Resources to understand these species, including their populations, need and habitat with the use of conservation and recovery plans, Conservation Agreements, Conservation Plans and Recommendations, and Herd Management Plans. New information and studies are always forthcoming and used during site-specific analysis. With the use of different categories such as threatened and endangered species and state listed species, it is understood that these animals have reduced populations and habitats.	No
Lynell Schalk	29	4	Misspelled word: "The Need to protect sage grouse….explore the possibility of buffer zones around leks (sic)." (Reference: 1.3.1.8 Wildlife and Fisheries Resources, Pg. 1-8, Vol. 1, sixth line of listed concerns).	"Lek" is the correct spelling for a sage-grouse strutting ground.	No
Lynell Schalk	29	16	What is the date of the statistics used for the desert bighorn sheep population (Reference: pg. 3-166, Vol.1)?	The numbers were given by the Utah Division of Wildlife Resources at the time the plan was being developed in 2005 or 2006. Numbers need to be updated.	Yes
Theodore	32	1	The Monticello Field Office must identify the hunting values	Impacts of Mineral Decisions on Recreational activities were	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Roosevelt Conservation Partnership			of the areas being considered for energy development and then determine how subsequent development will impact the uses our member 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 Monticello Field Office, it needs to be determined what the Monticello Field Office will do to provide our member and UT sportsmen with alternative locations where they can continue hunting during the appropriate lease-area determination process.	considered in Section 4.3.10.3.8.	
Public Lands Advocacy	35	4	On page 4-125 under Alternative C, the DEIS indicates timing limitation stipulations on oil and gas leases would be extended by 15 days (November 15-April 15) and imposed on an additional 68,856 acres. This of concern because the combination of wildlife stipulations proposed under all alternatives would leave operators only a 15-day window of opportunity to drill. This window is inadequate and will result in many areas being precluded from oil and gas opportunities. Under EPCA, BLM must ensure that such stipulations are the least restrictive necessary to protect the resource value in question.	In accordance with IM 2003-233, lease stipulation categories used by the Monticello Field Office are consistent with the Uniform Format for Oil and Gas Lease Stipulations prepared by the Rocky Mountain Regional Coordinating Committee in March 1989. The big game lease stipulations have exception, modification, and waiver language that allows for site-specific changes if found the project is found to not impact those wildlife resources. BLM is not sure how the commenter calculated the "15-day window of opportunity to drill". According to the calendar, there is approximately 120 days a year where there are no big game or sage-grouse stipulations attached to any area. In reality, when a proposed site is located, it will not have all the big game and other sensitive species located in that proposed area.	No
ECOS Consulting	58	8	The DRMP/EIS, includes a wildlife habitat fragmentation model that shows the BLM is willing to sacrifice over 76% of migratory bird habitat in the Monticello Planning Area, in Table 4.217 on page 4-601, just from the effects of planned designated roads and OHV routes alone. If one includes the effects of all other uses the figure probably rises to 80-95%.	The fragmentation analysis is not an attempt to quantify the specific impacts from the fragmentation that has or will result from existing or new road use and energy exploration and development, but is rather a tool to understand the differing impacts among alternatives for future habitat fragmentation.	No

WL – Wildlife					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
ECOS Consulting	58	18	The result of the "BLM GIS wildlife habitat fragmentation model" in Table 4.215 on page 4-599, shows more that 50% of Mule deer and Elk habitat to be adversely impacted by roads. Yet the BLM refuses to consider strategically closing and of these roads for the different alternatives, in order to lower the percentage of wildlife fragmentation. This is a viable solution that must be used in order to protect critical wildlife habitat. Closing some of these roads to lower fragmentation impacts should not be a problem especially since the BLM states in the DRMP/EIS that these roads are used very little.	DRMP/EIS provides a range of alternatives for the protection of wildlife habitats. Though fragmentation has been widely documented as causing an array of impacts to wildlife and their habitats, an alternative designed to provide totally unfragmented habitat is not a feasible and reasonable alternative. Fragmentation is an existing condition of wildlife habitat. To ensure that all federally listed, state sensitive, and big game species received adequate protective measures to protect habitats used for breeding, migration and the rearing of young, the BLM worked closely with the United States Fish and Wildlife Service and the Utah Division of Wildlife Resources to developed controlled surface use stipulations, seasonal and spatial buffers, habitat restoration plans and other measures that support Recovery Plans, Conservation Agreements, Conservation Plans and Recommendations, and Herd Management Plans. Other wildlife species, though not specifically addressed in the DRMP/EIS, will also benefit from the many management prescriptions in the preferred alternative.	No
ECOS Consulting	58	23	4.3.13.2.5 Impacts of Wildlife and Fisheries Decisions Common to All Alternatives Page 4-361, last Paragraph: The BLM must be more specific as to what it means by "maintenance and improvement" of migratory bird habitat. What specific techniques does the BLM plan to use? Have they been used in the past? If so, what are the specific locations where this has occurred? The BLM must also show an analysis of the needs and effectiveness of	In Section 4.3.13.2.5, the first sentence has been changed to state, "...low and high desert scrub communities, which are four important habitat types used by fish, amphibians, big game, and migratory birds in the Monticello PA." Maintenance and improvement could mean several things and also corresponds to improvement of vegetative conditions that was evaluated in Sections 4.3.17 (Vegetation Resources) and 4.3.11 (Riparian Resources). The acres of each habitat type that could be completed are analyzed in these sections. Site-specific NEPA would be done and impacts analyzed that would discuss exact location and techniques.	Yes

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			"maintenance and improvement" projects. What about the rest of the wildlife; the predators, the large mammals, small mammals, reptiles, amphibians, and other wildlife groups? How about the fish? What are the plans for fish and wildlife habitat improvement? These activities will all have direct, indirect, and cumulative impacts on soils and water resources, but there is no analysis here, no attempt to divulge extent, location, and duration of the impacts of these projects. This is a violation of NEPA.		
ECOS Consulting	58	30	Page 4-553, 1st Paragraph: In this paragraph it is stated: "The BLM would continue to allot 17,300 acres to wildlife, which would include parts of the slopes of Peter's Canyon and East Canyon." Devoting less that 1% of the Monticello Planning Area to wildlife is hardly "multiple use" or sustained yield, as required by FLPMA. Especially when considering the BLM is planning on devoting over 90% of the planning to livestock grazing. This figure should be raised to between 30-50% of the planning area in the preferred alternative for this Monticello DRMP/EIS.	The land use planning decision for livestock grazing involves identifying the areas that are available or not available for grazing. There is a narrow range in the alternatives for livestock grazing because the entire area is considered chiefly valuable for livestock grazing. Therefore, only areas with known major resource conflicts or inaccessible by livestock were considered for not grazing during the life of the land use plan. All other resource concerns involving livestock grazing are evaluated on a site specific allotment basis during permit renewal utilizing the Standards for Rangeland Health and Guidelines for Grazing Management. 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 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	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				lands.	
EOG Resources	60	32	The BLM's overall management for wildlife places significant restrictions on oil and gas development. See Monticello DRMP/EIS, pgs. 2-59 -- 2-62, Table 2.1. Alternative C, the BLM's Preferred Alternative, would restrict 38.4% more acres than current management. See Monticello DRMP/EIS, pg 2-85. As indicated in Table 2.1, the BLM's Preferred Alternative would impose stipulations lasting more than 243 days per year within the Monticello RA. See Monticello DRMP/EIS, pg. 4-127, Table 4.54. Under Alternatives B and E, the BLM's proposed stipulations would apply 273 days of the year. These stipulations are onerous and inappropriately limit oil and gas development in the Monticello RA. The BLM has not adequately explained why such stringent stipulations are necessary to protect the resource.	In accordance with IM 2003-233, lease stipulation categories used by the Monticello Field Office are consistent with the Uniform Format for Oil and Gas Lease Stipulations prepared by the Rocky Mountain Regional Coordinating Committee in March 1989. The big game lease stipulations have exception, modification, and waiver language that allows for site-specific changes if found the project is found to not impact those wildlife resources. BLM is not sure how the commenter calculated the "243-days of stipulations". Since some of the stipulation dates overlap, according to the calendar, there is approximately 120 days a year where there are no big game or sage-grouse stipulations attached to any area.	No
EOG Resources	60	33	On page 2-61, the BLM proposes to increase the timing limitation stipulation applied to pronghorn fawning areas by 15 days under all of the action alternatives. See Monticello DRMP/EIS, pg 2-61, Table 2.1. The BLM has not explained why the increased timing limitation is necessary. As the BLM is aware, it must ensure that any stipulations are the least restrictive necessary to protect the resource. Furthermore, the BLM proposes to increase the amount of this crucial habitat by 129% to 29,635 acres. See Monticello DRMP/EIS, pg 4-118. The BLM has not explained why it is necessary to apply these stipulations to such a large area.	The proposed timing limitation is based on recommendations by UDWR, the agency with jurisdictional authority on pronghorn.	No
EOG Resources	60	34	Under Alternative C, the BLM would expand the area subject to the timing limitations stipulation by 34.9%, or an additional 68,856 acres. See Monticello DRMP/EIS, pg 4-125. Under Alternatives B and E, the BLM proposes to increase the timing limitations to 60 days (November 1 - May 15). The BLM has not explained why the increased timing limitation is necessary. As the BLM is aware, it must ensure that any	The proposed timing limitation is based on recommendations by UDWR, the agency with jurisdictional authority on pronghorn.	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			stipulations are the least restrictive necessary to protect the resource. Furthermore, EOG objects the BLM's proposal under Alternatives B and E to apply crucial deer winter range stipulations to 785,921 acres within the Monticello RA. The BLM has not explained why it is necessary to apply these stipulations to such a large area.		
EOG Resources	60	35	On page 2-62, the BLM proposes to impose timing limitations in elk winter range. See Monticello DRMP/EIS, pg. 2-62, Table 2.1. EOG urges the BLM adopt the timing limitation proposed under Alternative D, which would restrict activities between December 1 and April 15. EOG strongly encourages the BLM not to adopt the 196-day timing limitations period (November 1 -- May 15) proposed under Alternatives B and E. The BLM has not explained why such a long timing limitations is necessary to protect elk winter range. The BLM must ensure that any stipulations are the least restrictive necessary to protect the resource.	UDWR has the jurisdictional authority for the identification of deer and elk habitat. The BLM relied on this expertise.	No
EOG Resources	60	55	On page 4-560, the BLM states, "Under all alternatives adherence to the Migratory Treat Bird Act [sic] and Executive Order 13186 'Responsibilities of Federal Agencies to Protect Migratory Birds' would have beneficial impacts on migratory birds…." The BLM then discusses its management action that would avoid surface disturbing activities in migratory bird habitat during nesting season. Contrary to the BLM's suggestion, neither the Migratory Bird Treaty Act of 1918 nor Executive Order 13186 requires the BLM to impose this management action. See 16 U.S.C. 703-712 (2006); Exec. Order No. 13,186, 66 Fed. Reg. 3853 (Jan. 17, 2001). The BLM must, at a minimum, revise its statements on page 4-560 to make clear that this management action is inconsistent with the Migratory Bird Treaty Act and Executive Order 13186. EOG urges the BLM to remove this management action from the Monticello RMP/EIS.	Although the Executive Order 13186 or the Migratory Bird Treaty Act does not state specifically what type of measures should be taken on surface disturbing activities, it is BLM's responsibility to decide how we are going to protect nesting habitat for migratory bird and by avoiding or minimizing surface disturbing activities during nesting season, the BLM is protecting migratory birds as mandated. By using the term "avoid" the BLM would consider on a case by case basis to allow a surface disturbing project if there is no reasonable alternative. At that time the activity would be done to minimize the impacts to migratory birds. BLM has added the words "or minimize" behind "avoid" to clarify this.	Yes
CrownQuest	62	41	The Monticello DRMP/EIS does not fully disclose the	Impacts to mineral development are discussed in section	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			impacts of the limited drilling window on oil and gas development in the Monticello RA.	4.3.7 on Page 4-86 through 4-144. The seasonal stipulations of threatened and endangered species and raptors only apply if after a survey the species are found near the proposed drill site. By following conservation and mitigation measures and stipulations, there is flexibility that allows for access to minerals while protecting wildlife appropriately.	
CrownQuest	62	53	The BLM's overall management for wildlife places significant restrictions on oil and gas development. The BLM has not adequately explained why such stringent stipulations are necessary to protect the resource.	BLM Manual 6840 states "Ensure actions requiring authorizations or approval by the BLM are consistent with the conservation needs of special status species and do not contribute to the need to list any special status species under provision of the Endangered Species Act.". The proposed restrictions in the preferred alternative of DRMP/EIS were developed to meet this Manual requirement. Chapter 3 discusses the environment and its current status.	No
CrownQuest	62	54	On page 2-59, as Management Common to All Alternatives, the BLM proposes to avoid surface-disturbing activities and vegetative-altering projects in identified occupied migratory bird habitat during migratory bird nesting season. See Monticello DRMP/EIS, pg. 2-59, Table 2.1. The BLM has not defined or mapped "identified occupied migratory bird habitat." Furthermore, the BLM has not identified any specific species of migratory bird that it aims to protect.	BLM is required to protect habitat for all migratory birds. A sentence has been added to this section to discuss how these areas will be determined. "Occupied priority migratory bird habitat will be determined with the use of Utah Partners in Flight Avian Conservation Strategy, Intermountain West Joint Venture Bird Habitat Conservation Areas, and other migratory bird conservation plans."	Yes
CrownQuest	62	55	On page 2-60, as Management Common to All Alternatives, the BLM proposes to apply compensatory measures when ground-disturbing activities occur in crucial habitats. See Monticello DRMP/EIS, pg. 2-60, Table 2.1. As BLM Washington Office Instruction Memorandum 2005-069 provides, the BLM may only consider off-site mitigation after it has applied best management practices. Furthermore, off-site mitigation must be voluntary on the part of the applicant. Finally, a blanket requirement for off-site mitigation in crucial habitat is entirely inconsistent with the BLM's off-site	On pg. 2-60, under management common to all with Bighorn Sheep, The sentence was removed the states, "On-site mitigation would be required for projects that disturb or remove forage and browse....forage lost." It is stated on pg. 2-60, under Habitat Improvements and Protection that, "BLM would follow BLM Washington Office Guidance (IM 2005-069) on application of compensatory measures.	Yes

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			mitigation policy, which considers off-site mitigation "appropriate when the specific conditions of a proposed project make such mitigation appropriate." See BLM Washington Office Instruction Memorandum 2005-069 (Feb. 1, 2005).		
CrownQuest	62	56	On page 2-61, the BLM proposes to increase the timing limitation stipulation applied to pronghorn fawning areas by 15 days under all of the action alternatives. See Monticello DRMP/EIS, pg 2-61, Table 2.1. The BLM has not explained why the increased timing limitations are necessary. As the BLM is aware, it must ensure that any stipulations are the least restrictive necessary to protect the resource. Furthermore, the BLM proposes to increase the amount of this crucial habitat by 129% to 29,635 acres. See Monticello DRMP/EIS, pg 4-118. The BLM has not explained why it is necessary to apply these stipulations to such a large area.	The proposed timing limitation is based on recommendations by UDWR, the agency with jurisdictional authority on pronghorn.	No
CrownQuest	62	57	On page 2-61, the BLM proposes to increase the timing limitation for deer crucial winter range from the existing limitation period (December 15- April 30) under Alternatives B, C, and E.	UDWR has the jurisdictional authority for the identification of deer and elk habitat. The BLM relied on this expertise, as well as UDWR's studies, in determining the timing limitations necessary to protect deer winter range.	No
CrownQuest	62	58	The BLM has not explained why the increased timing limitation is necessary. As the BLM is aware, it must ensure that any stipulations are the least restrictive necessary to protect the resource.	UDWR has the jurisdictional authority for the identification of deer and elk habitat. The BLM relied on this expertise.	No
CrownQuest	62	59	The BLM has not explained why it is necessary to apply these stipulations to such a large area.	UDWR has the jurisdictional authority for the identification of deer and elk habitat. The BLM relied on this expertise.	No
CrownQuest	62	60	Similarly, on page 2-62, the BLM proposes to impose timing limitations in elk winder range. The BLM has not explained why such a long timing limitation is necessary to protect elk winter range.	UDWR has the jurisdictional authority for the identification of deer and elk habitat. The BLM relied on this expertise , as well as UDWR's studies, in determining the timing limitations necessary to protect elk winter range.	No
CrownQuest	62	61	The BLM must ensure that these changes in timing stipulations are not imposed on existing leases through	The DRMP/EIS states on pg. 1-12 (as outlined in the BLM's Land Use Planning Manual (Section 1601.06G),) the planning	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			COAs on individual well activities. Further, the BLM cannot adjust CrownQuest's valid and existing rights. Congress made it clear when it enacted FLPMA that nothing therein, or in the land use plans developed thereunder, was intended to terminate, modify, or alter any valid or existing property rights. See 43 U.S.C. 1701 note (2006). Because the authority conferred in FLPMA is expressly made subject to valid existing rights, 43 U.S.C. 1701 note, and RMP prepared pursuant to FLPMA, after lease execution and after drilling and production has commenced, is likewise subject to existing rights. See Colorado Envtl. Coal., et al., 165 IBLA 221, 228 (2005)	process would recognize the existence of valid existing rights. Subject to valid existing rights, the BLM will work with a lease holder to modify proposed actions or activities to reduce the effect of the actions or activities on resource values and uses and also to protect threatened/endangered species and cultural resources. Additional modifications may be necessary to prevent undue and unnecessary.	
CrownQuest	62	91	On page 4-556, the BLM states, "Adverse impacts of minerals decisions on wildlife resources would be reduced by the implementation of [Best Management Practices] outlined in Section 2.1 and Appendix O." This statement is problematic for two reasons. First, Appendix O relates to Identification of Wilderness Characteristics on Non-WSA Lands Managed by Monticello BLM and not Best Management Practices (BMPs). Assumedly, the BLM intended to reference Appendix M, which identifies BMPs for Raptors and Their Associated Habitats in Utah.	A change has been made to the document to clarify this issue.	Yes
CrownQuest	62	93	As with its discussion of cumulative impacts to special status species, the BLM makes several assertions that cumulative impacts to wildlife and fisheries will occur, but does not identify any such cumulative impacts.	Cumulative impacts, by their nature, are large, landscape-level decisions. The specificity requested by the commenter would be speculative at best.	No
CrownQuest	62	95	On page A-12, the BLM identifies that a timing limitation (TL) will be applied under Alternative D that prohibits surface disturbing activities or occupancy between April 15 to May 15 for lambing and from November 1 to December 15 for rutting. Table 2.1 identifies the limitation periods as between April 1 to June 15 for lambing and October 15 to December 15 for rutting. See Monticello DRMP/EIS, pg 2-61, Table 2.1; see also Monticello DRMP/EIS, pg 4-134, Table 4.58.	The timing limitation dates have been corrected.	Yes

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
CrownQuest	62	96	Appendix A identifies the number of acres affected by TL stipulations to protect desert bighorn sheep. The numbers of acres presented in Appendix A are different than those presented in Table 2.1 for Alternatives B, D, and E. Compare Monticello DRMP/EIS, Appx. A pgs. A-11 -- A-12, Table A.1 with Monticello DRMP/EIS, pg 2-61, Table 2.1.	The acreage has been corrected.	Yes
CrownQuest	62	97	On page A-16, the BLM identifies a TL that will be applied under Alternative D that prohibits surface disturbing activities between December 15 and March 31. Table 2.1 identifies the limitation period as between December 1 and April 15. See Monticello DRMP/EIS, pg. 2-61, Table 2.1; see also Monticello DRMP/EIS, pg. 4-134, Table 4.58.	Dates have been corrected.	Yes
CrownQuest	62	98	Appendix A identifies the number of acres affected by TL stipulations to protect deer winter range. The numbers of acres presented in Appendix A are different than those presented in Table 2.1 for Alternatives B, D, and E. Compare Monticello DRMP/EIS, Appx. A, pgs. A-15 - A-16, Table A.1 with Monticello DRMP/EIS, pg 2-61, Table 2.1.	Acres have been corrected.	Yes
CrownQuest	62	99	On page A-18, the BLM identifies a TL that will be applied under Alternative D that prohibits surface disturbing activities between December 15 and March 31. Table 2.1 identifies the limitation periods as between December 1 and April 15. See Monticello DRMP/EIS, pg. 2-61, Table 2.1; see also Monticello DRMP/EIS, pg 4-134, Table 4.58	Dates have been corrected.	Yes
CrownQuest	62	100	Appendix A identifies the number of acres affected by TL stipulations to protect elk winter range. The numbers of acres presented in Appendix A are different tat those presented in Table 2.1 for Alternatives B, D, and E. Compare Monticello DRMP/EIS, Appx. A, pgs. A-17 - A-18, Table A.1 with Monticello DRMP/EIS, pg. 2-61, Table 2.1.	Acres have been corrected.	Yes
Gail Johnson	141	1	No where in the management plan does it acknowledge that the elk have negatively impacted the grazing allotments due to their increasing numbers during extreme drought	The impacts of elk on livestock grazing were analyzed in a previous NEPA document before elk were released in San Juan County. It was determined that there was sufficient	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			conditions, that they do compete for the same forage as livestock, and that there has been no attempt made to control or decrease elk numbers as there has been cattle during this drought. The management plan does mention that deer numbers have decreased in the area, but never acknowledges that there are scientific studies documenting that when elk are introduces into an area the deer population will suffer.	forage for both livestock and elk. Changes to the number of livestock and/or wildlife can be done throughout the next 15 years through monitoring and working with the Utah Division of Wildlife Resources. UDWR has the jurisdictional authority for the identification of deer and elk habitat and competition. The BLM does not have authority to direct decisions made by UDWR who manages the wildlife. Reference Page 2-7 under Management Common to All Resources where it states, "Wildlife Management: During periods of prolonged dryness or drought or other natural disaster, to the extent that wildlife grazing ungulate populations may not be sustainable and/or impacts to the resource habitats may occur due to competition for water and/or available forage and/or overall animals health is compromised, BLM may enter into discussions with the Utah Division of Wildlife Resources regarding temporary adjustments in herd numbers and overall management options to address the effects of drought."	
Gail Johnson	141	2	The BLM has never been objective when it comes to elk and this management plan reflects that. There should be options for the BLM to make the UDWR decrease elk numbers on BLM lands for the sake of the range itself and the sake of the deer herd.	UDWR has the jurisdictional authority for the identification of deer and elk habitat. The BLM does not have authority to direct decisions made by UDWR who manages the wildlife. Please reference Page 2-7 under Management Common to All Resources where it states, "Wildlife Management: During periods of prolonged dryness or drought or other natural disaster, to the extent that wildlife grazing ungulate populations may not be sustainable and/or impacts to the resource habitats may occur due to competition for water	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				and/or available forage and/or overall animals health is compromised, BLM may enter into discussions with the Utah Division of Wildlife Resources regarding temporary adjustments in herd numbers and overall management options to address the effects of drought."	
Mary Moran	145	2	P. 3-171, Where reptiles of the Monticello Project Area are briefly discussed: "Most turtles are aquatic, although a few live entirely on land." Perhaps a joke, a cut-and-paste error, or something stuck in to see how closely we are reading? I know there a couple naturalized non-native turtle species in southwest Utah (as well as native desert tortoises), but I sure didn't think San Juan County or Grand County had any turtles.	The sentence on turtles was put in by mistake and has been removed.	Yes
Theodore Roosevelt Conservation Partnership (TRCP)	215	1	Given the nature of leasing and the need for upfront comprehensive planning, it needs to be known during the RMP process how the Monticello 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 Utah hunters 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 Monticello 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 Monticello Field Office is sacrificing their ability to adequately plan energy development and accomplish the mitigation tactics of	The RMP is a landscape level planning tool to which site specific proposals are tiered. There must first be a proposed project prior to developing site specific mitigation. Leasing itself is not a proposed action with a purpose and need, therefore, developing mitigation is not within the scope of this document. Site specific mitigation is developed at the time of the oil and gas development project, which is subject to site-specific NEPA analysis. The action of leasing itself does not provide the site specific details necessary for extensive analyses of oil and gas development. Upon actual development of leasing tracts, environment analyses will be conducted to determine what the specific conflicts, impacts and mitigation will be. Cumulative impacts will also be determined and mitigation measures developed. Public lands are managed under a multiple use mandate. All resources are considered, including wildlife. The BLM has an obligation to ensure that wildlife is protected. Refer to Appendix A. Stipulations Applicable to Oil and Gas Leasing and Other Surface	No

WL – Wildlife					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			avoiding, minimizing, and reducing impacts on the public's fish and wildlife habitat.	Disturbing Activities. In this appendix, it lists all the stipulations that were developed in coordination with the Utah Division of Wildlife Resources to prevent and/or minimize negative impacts to pronghorn, deer, elk, and bighorn sheep. Hunting is considered a recreational activity and Impacts of Mineral Decisions on recreational activities were considered in Section 4.3.10.3.8.	
Theodore Roosevelt Conservation Partnership (TRCP)	215	2	The Monticello 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 Monticello 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 Monticello Field Office, it needs to be determined what the Monticello 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.	Compensating hunters for the loss of big game due to energy development is not within the scope of the RMP. Upon site specific analysis for specific oil and gas project proposals, hunting values will be considered if impacted. Mitigation may be developed at the project development stage. Most public lands are open to hunting; therefore providing alternative locations on public lands is not applicable mitigation.	No
Form Letter 2	FL2	1	As a sportsman who understands the importance of the Monticello BLM management area for the future of quality desert bighorn, elk and mule deer hunting opportunities, I respectfully submit the following comments on the draft environmental impact statement (DEIS) for the Monticello resource management plan (RMP).	The BLM has worked extensively with the Utah Division of Wildlife Resources, as well as with the U.S. Fish and Wildlife Service, to ensure that the stipulations placed on consumptive uses in the Monticello Field Office do not unduly harm wildlife populations in the planning area.	No

WL – Wildlife				
Commenter Name	Record ID & Comment Number	Comment Text	Response to Comment	Doc Mod
		I am concerned about how energy development is impacting fish and wildlife in the Rocky Mountain West. If pursued irresponsibly, oil and gas development can greatly reduce hunting and angling opportunities on our public lands. The valuable hunting resources in the Monticello field office area demand that the BLM implement a responsible and balanced approach to energy development in the region. I believe that the Monticello DEIS generally ignores timely scientific studies and does not provide adequate assurances for mule deer, desert bighorn sheep, Rocky Mountain elk and sage grouse. I am concerned that the DEIS would enable energy leasing in crucial wildlife habitats without the upfront conservation planning that is necessary to balance the needs of wildlife and fish with development. The impacts of development on big game and fisheries should be weighed in advance so that fish and wildlife losses can be prevented or minimized. Leasing entails a de facto contractual obligation for development. While timing stipulations are important, they do not address how an area will be developed in order to minimize impacts on wildlife habitats and populations. Upfront planning prior to leasing is a necessary component of responsible energy development. Likewise, the BLM should adopt some level of phased oil and gas development in crucial habitats, including provisions for ongoing, intensive monitoring of fish and wildlife species and their habitats to facilitate alterations in development if unintended adverse impacts occur. The BLM should identify		

WL – Wildlife				
Commenter Name	**Record ID & Comment Number**	**Comment Text**	**Response to Comment**	**Doc Mod**
		and commit necessary funding to conduct the monitoring and mitigation work prior to leasing habitat for energy development. Furthermore, the BLM should detail how public lands proposed for leasing and development will be managed for a balance of uses, including hunting and fishing, as required by multiple-use mandate in the Federal Land Policy and Management Act. Given the long-term nature of energy development, the BLM should include its plan for compensating hunters for the loss of big game that might occur as a result of development. Specific areas of concern include, but are not limited to, the San Juan South and San Juan Lockhart desert bighorn sheep hunting units, the San Juan elk premium limited hunt area and the Elk Ridge limited mule deer hunt unit, as well as sage grouse strutting and nesting areas. I appreciate this opportunity to comment on the Monticello DEIS RMP and your consideration and incorporation of my comments into the final alternatives.		

WR – Water Resources					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Environmental Protection Agency Region 8	1	20	EPA is concerned about current and potential impacts to surface and ground water resources and indirect impacts to aquatic plant and fish species. Where water quality impacts are significant or water bodies are particularly vulnerable, more site-specific information is needed in the FEIS on how water quality is being threatened and impacted. Mitigation measures proposed under alternative C will not be sufficient to restore surface and ground water resources in these impacted and vulnerable areas. More stringent mitigation measures are needed in order to restore and adequately protect water resources.	Land use planning level decisions involve broad resource allocations and qualitative analysis is often all that is available. Further site specific analysis and mitigation measures on the impacts to the resources specified by the commenter will be conducted on the project level. The DRMP/EIS on pg. 1-10 recognizes that the BLM must comply with the Clean Air Act, the Clean Water Act, and many other nondiscretionary laws. This would include conformance with State and local laws.	No
State of Utah	4	32	The State Engineer recommends that the BLM consider the impact its actions may have on water rights in general and non-BLM water rights in particular.	On page 1-12 of the DRMP/DEIS under Planning Criteria, the BLM states 1) the planning process would recognize the existence of valid existing rights, and 2) the BLM would adhere to all applicable laws (including state and local laws). The text has been edited to ensure that water rights are recognized as valid existing rights.	Yes
State of Utah	4	85	Potential dam locations are shown on Map 46. The state assumes that the potential to construct dams in these areas has been preserved in the RMP but it is hard to tell from the maps and text whether or not this is the case. BLM should clarify by adding language to appropriate sections.	Potential dam locations were included on Map 46 as a factor related to potential eligibility for wild and scenic river designation. It was later determined that these potential dam sites did not affect the eligibility classification so this information has been removed from the map. Any future proposal for dam construction would be assessed on a case-by-case basis regardless of whether such information is listed in the RMP.	Yes
Ute Mountain Ute Tribe	6	6	The Tribe is concerned that mineral development has the potential to adversely affect water resources. Cottonwood Canyon has been historically polluted by uranium mining and BLM needs to ensure that previous efforts to mitigate pollution are not rendered meaningless by future development, particularly in Cottonwood Canyon. Oil and	The Environmental Protection Agency has delegated the responsibility under the Clean Water Act to the State of Utah. The BLM manages the public lands so as not to exceed the State of Utah water quality standards. The State identifies waters that are not meeting water quality standards.	No

WR – Water Resources					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Gas production has the potential to pollute water and air and damage other Tribal resources. Use of the Navajo/Entrada aquifer for oil, gas and uranium development could deplete this drinking water aquifer that supplies the White Mesa community, Blanding, Bluff, Montezuma Creek, Aneth and private wells.	All mineral operations on federal lands are required to comply with applicable laws and regulations, including requirements for meeting state water quality standards. Measures to protect water quality are imposed at the project level through appropriate environmental analysis and the attachment of stipulations or conditions of approval to project authorizations. The BLM would consult with the appropriate state agency, as necessary, to ensure that proposed operations include best management practices to protect water quality.	
San Juan County	7	5	San Juan County feels more emphasis should be placed on sustaining and developing healthy watersheds. The functionality of watersheds underlies all resources values. The best way to improve the functionality of watersheds is by Increasing the ground cover. Well managed grazing is one of the best, most economical, large scale tools for increasing ground cover.	The BLM actively supports efforts to improve watersheds. The BLM is a partner in the Healthy Lands Initiative for Utah. The RMP, under all action alternatives, specifies the treatment of 30,000 to 50,000 acres over a 15 year period to restore ecosystem health and functioning condition (p. 2-58 of the DEIS). The RMP, under all alternatives, also specifies that grazing would be managed according to the Guidelines for Livestock Grazing Management to meet the Standards for Rangeland Health. Implementation of these standards would improve watershed health and functioning condition.	No
San Juan County	7	44	Pg. 2-33 - San Juan County feels that more emphasis on watersheds is needed in the RMP.	Please refer to response to comment 007-5.	No
ECOS Consulting	58	9	No reports are presented or summarized in the Monticello DRMP/EIS regarding water quality and quantity in the Planning Area. We do not know what the water quality and quantity trends are in the various drainages and seeps and springs, or if any of the allowed activities could be affecting water quality or quantity. This information has allegedly been collected by the BLM for since 1997, in concert with the State of Utah, yet there is little data presented or summarized. OHV use, mining, and livestock grazing activities can all have serious local and regional direct, indirect, and cumulative adverse impacts on water quality and quantity. It is not enough to state that water quality and quantity are being monitored. Nor is it enough to wait for a	The Environmental Protection Agency has delegated the responsibility under the Clean Water Act to the State of Utah. The BLM manages the public lands so as not to exceed the State of Utah water quality standards. The State identifies trends and waters that are not meeting water quality standards. In Table 3.45 on Page 3-125, problem watersheds have been identified and are summarized.	No

WR – Water Resources					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			water body to be added to the state TMDL Section 303(d) list, by that time it is nearly too late to reverse the trend. This data must be analyzed for trends and summarized in this Monticello DRMP/EIS, and the trends must be constantly checked in order to prevent future water quality degradation at specific sites. With specific trend data on particular chemical and biological water quality parameters, it can usually be determined what activity is affecting the water quality, and these activities must be pro-actively managed to prevent future water quality and quantity issues.		
CrownQuest	62	34	On page 2-33, the BLM identifies the following Management Common to All Alternatives: "Comply with Utah's state water quality standards." See Monticello DRMP/EIS, pg 2-33, Table 2.1. The BLM should clarify this management item to make clear that the BLM does not have jurisdiction to enforce the state of Utah's water quality standards. The Clean Water Act charges the Utah Division of Water Quality--not the BLM--with enforcement of water quality standards.	The management of Utah's water and responsibilities are discussed in detail in Chapter 3 on page 3-123 to 3-124. The Environmental Protection Agency has delegated the responsibility under the Clean Water Act to the State of Utah. The BLM manages the public lands so as not to exceed the State of Utah water quality standards. The State identifies waters that are not meeting water quality standards.	No

WSA – Wilderness Study Areas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
Spear	19	3	Commenter requests no routes be designated in non-Wilderness Study Area (WSA) lands with wilderness character.	The DRMP/EIS considered a range of alternatives for protecting lands identified by the BLM with wilderness characteristics. All lands identified by the BLM with wilderness characteristics are protected from development in Alt B. Under the land use planning process the BLM must consider a range of alternatives for the lands identified with wilderness characteristics but the management of WC lands is discretionary. The BLM is not required to protect the wilderness characteristics of these lands nor preclude route designations within them.	No
Southern Utah Wilderness Alliance	26	17	The existing condition and impacts of ORV use on wilderness character in the WSAs.	The BLM has consistently and repeatedly stated that "Wilderness Study Areas (WSA) would be managed according to the Interim Management Policy and guidelines for Lands Under Wilder Review (IMP)" page 2-7. This plan makes no decisions regarding WSAs. Only routes that existed at the time the WSA was created are maintained in the travel plan.	No
Southern Utah Wilderness Alliance	26	29	The Moab Draft RMP should have fully analyzed an alternative designating new Wilderness Study Areas. SUWA maintains that BLM has the authority and the responsibility pursuant to FLPMA at Section 202 to fully analyze an alternative that would designate new wilderness study areas.	The BLM authority to establish new WSAs pursuant to Section 603 of FLPMA expired no later than October 21, 1993, therefore as stated on pg. 1-11 of the Monticello DRMP/DEIS designation of new wilderness areas or WSA proposals are decisions outside of the scope of the DRMP/DEIS.	No
Southern Utah Wilderness Alliance	26	87	The DRMP/EIS directs readers to see below for miles of route per WSA but this mileage never appears anywhere in the DRMP/EIS.	A change has been made in the document.	Yes
Southern Utah Wilderness Alliance	26	88	If released, WSAs should be managed to protect their wilderness characteristics.	Chapter 3, pg. 137 states: "Only Congress can release a WSA from wilderness consideration. Should any WSA, in part or in whole, be released from wilderness consideration, proposals in the released area would be examined on a case-by-case basis for consistency with the goals and objectives of	No

WSA – Wilderness Study Areas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				the RMP decisions. Actions inconsistent with RMP goals and objectives would be deferred until completion of requisite plan amendments. Because the management direction of the released land would continue in accordance with the goals and objectives established in the RMP, there is no separate analysis required in this Land Use Plan to address resource impacts if any WSAs are released."	
Sierra Club Uncompahgre Group	30	1	Table 3.19 lists 29 areas that were dropped have now been found to have wilderness characteristics, containing 582,360 acres. However, the plan does not provide any protection for those areas. Only the 13 wilderness study areas identified in 1980, containing 389,444 acres, would have protection.	As described in Chapter 1, pg. 1-10 of the DRMP/DEIS under the title "Issues Addressed Through Policy or Administrative Action," WSAs are managed in accordance with the Interim Management Policy for Lands Under Wilderness Review (IMP, H-8550-1; BLM 1995). The WSAs are statutorily required, pursuant to FLPMA Section 603(c), to be managed to protect their suitability for Congressional designation. The DRMP/EIS considered a range of alternatives for protecting lands identified by the BLM with wilderness characteristics. All lands identified by the BLM with wilderness characteristics are protected from development in Alt E. Under the land use planning process the BLM must consider a range of alternatives for the lands identified with wilderness characteristics but the management of WC lands is discretionary. The BLM is not required to protect the wilderness characteristics of these lands. The proposed FEIS will state that the MFO will manage 88,871 acres for wilderness characteristics. This acreage includes Dark Canyon (11,540 acres), Mancos Mesa (30,068 acres), Nokai Dome West (14,988 acres), Nokai Dome East (18,618 acres) and Grand Gulch (13,657 acres). Management prescriptions include: All existing improvements could be maintained at their current level.	No

WSA – Wilderness Study Areas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				VRM II for surface disturbing activities. No Surface Occupancy for Dark Canyon and Closed to leasing for Mancos Mesa, Nokai Dome West, Nokai Dome East and Grand Gulch. OHV travel limited to designated roads and trails. Avoidance areas for rights-of-way. Fire suppression on non-WSA lands with wilderness characteristics would be through light on the land techniques.	
Sierra Club Uncompahgre Group	30	2	BLM has never completed a wilderness study of the areas in Table 3.19, so there has been no Interior Department recommendation for or against wilderness designation. America's Red Rock Wilderness Act (S. 1170), co-sponsored by several Colorado legislators among more than 170 nationwide, proposes all those areas for wilderness status. The final Monticello plan should incorporate the protection measures in Alternative E, namely closure to ORVs and mineral leasing and designation of qualifying lands as areas of critical environmental concern and wild and scenic rivers.	Table 3.19 on page 3-68 is in fact a Summary of Lands Evaluated for Wilderness Characteristics. Section 3.9 on page 3-67 details the process that was followed. Lands that are currently proposed for wilderness as part of S.1170, America's Red Rock Wilderness Act of 2007 have been reviewed for wilderness characteristics by the BLM. In the FEIS, the BLM has designated 74,403 acres as ACECs and 35.7 miles of river for inclusion into the Wild and Scenic River Program.	No
Utah State Office of Education	31	3	At the current time, approximately 46,541 surface acres are inheld in Wilderness Study Areas (WSAs) in the MPA. When these lands are added to the 66,515 acres included in the proposed non-WSA lands in the Alternative E, Utah's school trust will be left with approximately 113,056 surface acres within the MPA that cannot produce revenue or that will have reduced revenue potential. In this respect, the Resource Management Plan includes an unconstitutional taking of approximately 57% of the school children's lands within the MPA, and the BLM must include specific provisions in the RMP to adequately compensate the school trust, through exchanges or purchase if the Board of Trustees determines it desires to sell the property so captured.	Non-BLM lands could be indirectly impacted by RMP decisions both positively and negatively. The analysis in Chapter 4 of the PRMP/FEIS has been modified accordingly. The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). Information has been added to Chapter 2, Lands and Realty, Management Common to all action alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79). In addition, the Monticello DRMP/DEIS travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision. Also, please see the revised	Yes

WSA – Wilderness Study Areas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				analysis under Socio-Economics in Chapter 4 of the PRMP/FEIS. The need for BLM to give priority to State-Federal land exchanges has been recognized.	
Broads Healthy Lands	41	17	The Collins Spring access road seems to end at the Grand Gulch ISA per the 1999 BLM Inventory, but the TMP shows this road entering the ISA. There is an additional several mile section of road shown on the Alt C map that appears to be on the boundary that does not exist on maps published in the 1999 Inventory. These routes must be removed from the preferred alternative of the final TMP.	The Collins Springs access road the commenter is referring to is proposed to be closed to the public at the ISA boundary. The road outside of the ISA is proposed to remain open in the plan.	Yes
Broads Healthy Lands	41	18	Mancos Mesa WSA -Alt C shows 25 miles of ways that do not exist on maps published in the 1999 Inventory. These routes would be accessed by descending the Moqui Sandslide, then traveling up Moqui Canyon for several miles. These routes must be removed from the preferred alternative of the final TMP.	The routes within the Mancos Mesa WSA have been closed in the PRMP.	No
Broads Healthy Lands	41	19	Fish Creek WSA -Alt C shows many miles of motorized routes along both the southwest and southeast perimeters of this WSA that do not exist on maps published in the 1999 Inventory. Designation of these for motorized travel make the WSA susceptible to encroachment and damage, as well as making the boundary even more difficult to enforce. There are also two routes shown entering the WSA from the north that did not exist in 1999. Your table shows 19.8 miles of ways, while the 1999 Inventory showed less than 6 miles of routes within the WSA. These routes must be removed from the preferred alternative of the final TMP.	The preferred alternative closes 10 routes or ways within the WSA for approximately 23.4 miles. Two ways remain open in the PRMP for temporary, conditional motorized use to provide access to existing trailheads. Trailheads would be relocated outside of the WSA and the routes rehabilitated at a future date. The 19.8 miles of ways the commenter refers to were inventoried when the WSA was established. The 1999 inventory maps may not include all ways and or routes within the WSAs. The routes outside of the WSA are to remain open in the preferred alternative.	No
Broads Healthy Lands	41	20	Road Canyon WSA -Alt ,C shows routes within this WSA and along its boundaries that do not exist on maps published	The commenter may be referring to the 1999 Utah Wilderness Inventory. As directed by the Secretary of the Interior, this	No

WSA – Wilderness Study Areas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			in the 1999 Inventory. There is one several mile route on the east that is new along the WSA boundary, a short route on the southwest boundary that is new and two lengthy routes within the WSA. These routes must be removed from the preferred alternative of the final TMP.	inventory did not review lands within wilderness study areas but reviewed lands outside of the WSAs that may have wilderness characteristics. In the proposed plan, six route sections are to be closed within the WSA. The two lengthy roads the commenter refers to are most likely one way that accesses a state section and one cherry stemmed route established when the WSA was created. Both will remain open under the proposed plan. Where routes remain available for motorized use within WSAs, such use would continue on a temporary, conditional basis to provide recreational access to existing trailheads. Trailheads would be relocated outside of the WSA and the ways rehabilitated at a future date. Use of existing routes in WSAs (“ways’ when located within WSAs) could continue as long as the use of these routes does not impair wilderness suitability, as provided by the 1995 BLM IMP. The BLM could take further action to limit use or close them if found through monitoring the suitability for wilderness designation is being impaired.	
Broads Healthy Lands	41	21	Mule Canyon WSA -No way is noted in the 1999 inventory, but BLM's table shows 0.3 miles of way. You propose a route along the southeast edge of this WSA which is not needed for access and will serve to compromise the WSA. This route must be removed from the preferred alternative of the final TMP.	No way is proposed inside Mule Canyon WSA. The route the commenter recommends for closure along the southeast boundary is an established route and is proposed to remain open in the plan.	No
Broads Healthy Lands	41	22	Squaw Canyon WSA -Thankfully, BLM is not proposing any new routes or ways in this WSA. However, you are proposing an extension of a route along the north boundary that does not exist on maps published in the 1999 Inventory. Please consider eliminating all but the original well-pad access route.	Two existing short sections of routes within the WSA are proposed for closure in Alternative C and not shown on the map. There are no proposed routes or ways within this WSA. The route the commenter recommends for closure is proposed to remain open in the plan.	Yes
Broads Healthy Lands	41	23	Dark Canyon WSA -Alt C shows several miles of routes in this WSA that does not exist on maps published in the 1999	The route the commenter is referring to is a route that was cherry stemmed when the WSA was created and the closing	No

WSA – Wilderness Study Areas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Inventory. This route must be removed from the preferred alternative of the final TMP.	of this route is out of the scope of this planning process. Six existing routes not shown on Alternative C are proposed for closure in the plan.	
Broads Healthy Lands	41	24	Indian Creek WSA -Thankfully, BLM does not attempt to designate new routes in this WSA. However, BLM's maps show a new route coming to the north edge of the WSA (within Canyonlands National Park) that should not be reflected in your route designations.	Changes have been made to the Travel Plan (maps 49-53) as suggested by the commenter and the routes within the National Park have been removed.	Yes
Broads Healthy Lands	41	25	Bridger Jack Mesa WSA -No new routes are shown in this WSA, however BLM is attempting to designate new routes along the west side of the WSA that do not exist on maps published in the 1999 Inventory, These new routes would create a route system that unnecessarily encircles the WSA, and may jeopardize the area's wilderness character.	The route the commenter is referring to is a route that was cherry stemmed when the WSA was created and the closing of this route is out of the scope of this planning process. Six existing routes not shown on Alternative C are proposed for closure in the plan.	No
IPAMS(Independent Petroleum Assc of Mountain State	55	1	Many of the boundaries have been "cherry stemmed" to go around roads or other structures that would otherwise disrupt the continuity of the area, thereby making a mockery of the criterion for wilderness designation of 5,000 acres of contiguous undisturbed land. This arbitrary drawing of boundaries enables the designation of wilderness in land that really by any common sense analysis does not meet the standard for wilderness. IPAMS urges the BLM to put an end to the policy of cherry stemming, and include a 1.5 mile buffer around human impacts. In the event that the 1.5 mile buffer results in a non-contiguous wilderness characteristics area, then the BLM should automatically "delist" the area as containing wilderness characteristics. It defies common sense to have a busy road or a man-made structure right in the middle of a WCA and call that land that immediately abuts that road or structure wilderness. It also doesn't make sense to have roads as the boundaries for WCAs.	Considering lands for WSA or wilderness designation is beyond the scope of BLM's land use planning effort, as identified on pg. 1-6 of the DRMP/DEIS. "Cherry stemming" is a land management technique that facilitates better land management by allowing ingress and egress without compromising a special designation. This technique is often applied to WSAs. However, the BLM is not proposing any WSAs under any alternative in the Monticello DRMP/DEIS. Furthermore, no lands are proposed for management of wilderness characteristics in San Juan County for Alternative C (Preferred) of the DRMP/DEIS.	No
ECOS Consulting	58	15	In this Monticello DRMP/EIS, there are no planned special protections for Non-WSA Lands with Wilderness	Considering lands for WSA or wilderness designation is beyond the scope of BLM's land use planning effort, as	No

WSA – Wilderness Study Areas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Characteristics in Alternatives A, B, C, and D. Thus 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 Wilderness Characteristics. Where are the cumulative impact analyses for livestock grazing, vegetation treatments, fire suppression and hazardous fuels management, OHV use, and mineral and energy development? If the BLM claims that cumulative impacts do not exist or are insignificant, it must include a basis for that conclusion, but the DRMP/EIS fails include any such analysis or scientific and objective data on which to form an opinion. The BLM must consider cumulative impacts from all activities, and carefully search out, document, and analyze all past, present, and reasonably foreseeable future actions. The BLM must also consider the impacts of its management activities on adjacent lands managed by the BLM and other agencies.	identified on pg. 1-6 of the DRMP/DEIS. Chapter 4 of the DRMP/DEIS analyzes the impacts from management prescriptions which protect Non-WSA lands with wilderness characteristics, and the impacts on other resources and uses because of that protection. In addition, during the inventory process, the majority of the existing land uses were identified and taken into consideration when determining areas with wilderness characteristics. The source of the information was documented unit-by-unit during the wilderness review. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the units, was part of the review process. This inventory is available on the Monticello RMP website, and is part of the Administrative Record. The information is also available upon request. Those Non-WSA lands that are considered to be managed to maintain the wilderness characteristics in Alternative B were also analyzed for their suitability for other uses.	
Glen Canyon Institute	222	2	There are 13 Wilderness Study Areas (WSAs), totaling 386,027 acres, on the lands encompassed by the Monticello DRMP (p. 4-351, 4-415). The agency has a legal mandate to preserve these areas until the Congress decides on their disposition (they are included America's Red Rock Wilderness Act). The DRMP violates this mandate by designating dozens of miles of off-road vehicle (ORV) routes in WSAs (p. 2-55). The BLM cannot unilaterally ignore congressional direction without prior approval. Changes Needed in the Final Resource Management Plan. 1. Ban ORVs and all other activities that would not be	THE DRMP designates a limited number of ways in WSAs to provide access to trailheads and to stay in compliance with agreements with San Juan County. Route designation in WSAs is discussed at length on page N-12, N.7.2.4., Route Designation in Wilderness Study Areas.	No

WSA – Wilderness Study Areas					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			allowed in designated wilderness areas, from all identified WSAs until the Congress and the American people have the chance to fully consider wilderness legislation. 2. Ensure the ORV closures include physical barriers to entry and are adequately patrolled, managed, and enforced. 3. Provide a complete review of the relevant legal and administrative mandates related to the management of WSAs in Chapter 1 of the EIS, and an explanation of how the BLM is obeying these mandates.		

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
State of Utah	4	17	The State believes that the BLM should disclose the reasons and rationale for determinations of eligibility and suitability for proposed additions to the National Wild and Scenic River System, and to fully meet the requirements of state and federal law in doing so.	The Preliminary Eligibility Determination of Wild and Scenic Rivers (BLM, 2003) details the steps undertaken in the eligibility review process including the identification of outstandingly remarkable values as well as the Suitability Considerations by eligible river segments. The BLM complied with all applicable Federal laws, regulations, and policies in the Wild and Scenic Rivers Study Process. Appendix H, beginning on page H-91 gives detailed information on tentative classification of eligible wild and scenic segments and suitability considerations.	No
State of Utah	4	18	The State is concerned that Wild and Scenic River designations may limit water development by communities for future growth, limit industrial and agricultural growth, and reduce funding for the Colorado River Salinity Control program.	The Wild and Scenic Rivers Act implies a Federal reserved water right; however, it must be the minimal amount necessary for purposed of the Act, it must be adjudicated through State processes, and it would be junior to existing water rights. The amount of Federal right will vary from river to river, depending on the river's flows, the un-appropriated quantities in the river, and the values for which the river is being protected. There is no effect whatsoever on water rights on in -stream flows related to suitability findings made in a land use plan decision, barring Congressional action. Even if Congress were to designate rivers in the National Wild and Scenic Rivers System, any such designation would have no affect on existing, valid water rights. Section 13 (b) of the Wild and Scenic Rivers Act states that jurisdiction over waters is determined by established principles of law. In Utah, the state has jurisdiction over water. Although the Wild and Scenic Rivers Act implies a federal reserved water right for designated rivers, it doesn't require or specify any amount, and instead establishes that only the minimum amount for purpose of the Act can be acquired. Because the State of	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				Utah has jurisdiction over water, BLM would be required to adjudicate the right as would any other entity, by application through state processes. Thus, for Congressionally designated rivers, BLM may assert a federal reserved water right to appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. In practice, however, federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values. During the suitability phase of the Wild and Scenic River process, San Juan County as well as the State of Utah and SITLA, were asked to supply information on uses, "including reasonably foreseeable potential uses of the area and related waters, which would be enhanced, foreclosed, or curtailed if the area were included in the national system of rivers, and the values which could be foreclosed or diminished if the area is not protected as part of the national system." (The Preliminary Eligibility Determination of Wild and Scenic Rivers, BLM, 2003). The preliminary eligibility determination summarizes suitability input by the public as well as local communities. Suitability decisions were made considering the results of this input. In 1994, Public Law 98-569 amended the Colorado River Basin Salinity Control Act and directed the Secretary to develop a comprehensive program for minimizing salt contributions from lands administered by BLM and to provide a report on this program to the Congress and the Advisory Council. BLM's Colorado River Basin Salinity Control program is designed to provide the best management practices (BMP) of the basic resource base. Successes with the resource base	

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				will translate to improved vegetation cover, better use of onsite precipitation, and stronger plant root systems. In turn, a more stable runoff regime and reduced soil loss should result, thus benefiting water quality of the streams in the Colorado River Basin including the San Juan River. In Section 1(b) of the Wild and Scenic Rivers Act, Congress states that one of the objectives of the Act is to protect the water quality of designated rivers. Congress further specified that the river-administering agencies cooperate with the EPA and state water pollution control agencies to eliminate or diminish water pollution (Section 2©). Comparing the two, it is clear that the Wild and Scenic Rivers Act and the Colorado River Basin Salinity Control Act are not only complementary of one another, but share the same objective with regard to water quality. The Wild and Scenic Rivers Act directs the Secretary of the Interior or any government agency to prohibit any loan, grant, license, or otherwise construction of any water resources project that would have a direct effect on the values for which such river designation was established. The law also states that it cannot preclude licensing of, or assistance to, developments below or above a wild, scenic, or recreational river area or on any stream tributary thereto that will not invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area on the date of designation of a river as a component of the National Wild and Scenic Rivers System. However, projects intended to comply with the Colorado River Salinity Control Act are those that would generally benefit stream segments instead of affecting or unreasonably diminishing its values including water quality.	
State of Utah	4	19	The state is concerned about suitability findings for those streams where there are significant water diversions upstream.	According the "Wild and Scenic River Review in the State of Utah Process and Criteria for Interagency Use" (July 1996), Congress has allowed for the existence of some human modification of a riverway, the presence of impoundments or major dams above or below a segment under review	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				(including those that may regulate the flow regime through the segment). The existence of minor dams, diversion structures, and rip-rap within the segment shall not by themselves render a reach ineligible.	
State of Utah	4	20	The State is concerned that the Draft RMP/EIS does not state the authority for protection of river segments while studies conducted under the Wild and Scenic Rivers Act are underway.	Section 5 (d) of the Wild and Scenic Rivers Act requires that Federal land management agencies make wild and scenic river considerations during land use planning. Two stages of review are involved. Eligibility is an inventory, solely involving river values. Suitability involves consideration of manageability and resource conflicts. As per BLM Manual 8351-Wild and Scenic Rivers-Policy and program .32 C, all eligible rivers are considered in the EIS for the planning effort as to their suitability for congressional designation into the National Wild and Scenic Rivers System. With any suitability determination made in the RMP, the free-flowing, outstandingly remarkable values, and tentative classification of rivers would continue to be protected until Congress makes a decision on designation. The Preliminary Eligibility Determination of Wild and Scenic Rivers (BLM, 2003) describes the authorities for the Wild and Scenic Rivers Study Process.	No
State of Utah	4	84	Table 3.50 – Individual Eligible Wild and Scenic River(s) Segments. In determining suitability, the rights of irrigators to divert flow from these rivers and streams need to be fully protected and considered.	Barring congressional action, there is no effect on water rights or instream flows related to suitability findings made in a land use plan decision. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no effect on existing water rights. Section 13(b) of the Wild and Scenic River Act states that jurisdiction over waters is determined by established principles of law. In Utah, the State has jurisdiction over water. Although the Wild and Scenic Rivers Act implies a federal reserved water right for designated rivers, it does not	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				require or specify any amount, and as noted above, confirms that Utah has jurisdiction over water rights. The BLM would be required to adjudicate the water right, in the same manner as any other entity, by application through state processes. Thus, for congressionally designated rivers, BLM may assert a federal reserved water right for appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. The Draft RMP/EIS states that the BLM would not seek water rights as part of a suitability determination made in the Record of Decision for the RMP. Please refer to response to comments 004-17, 004-18, 004-19, and 004-20.	
Ute Mountain Ute Tribe	6	8	The Tribe supports the designation of all 92.4 miles of rivers and streams proposed as wild and scenic rivers.	Alternative B emphasizes the protection/preservation of natural resources, thereby analyzing the impacts of finding all eligible river segments as suitable. Alternative C is the preferred alternative because it provides a balanced approach of protection/preservation of natural resources while providing for commodity production and extraction. As a result, Alternative B includes all eligible river segments as suitable with maximum protection provided for these segments. Alternative C 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	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				prescriptions, or other management considerations." Appendix H fully discloses the review and evaluation process for determining which river segments are eligible and suitable for such designation. In Alternative C, 18.4 miles are proposed as suitable for inclusion into the Wild and Scenic System. In the FEIS, in addition to the segments recommended as suitable, segment 5 of the San Juan River is recommended as suitable for a total of 35.7 miles.	
San Juan County	7	52	Pg. 2-45 - San Juan County feels that a W&SR designation in Dark Canyon is unnecessary because current management for the WSA already protects the ORVs. W&SR status for this segment would be confusing and would present unnecessary management problems and associated costs.	The Wild and Scenic River suitability process and the WSA process differ. The outstandingly remarkable values found along Dark Canyon differ from the wilderness values found within the WSA. It is very common for rivers within Wilderness Areas to be designated as Wild and Scenic Rivers by Congress.	No
San Juan County	7	67	San Juan County opposes any statement in the DRMP/EIS which purports to continue to manage eligible river segments, or presumptively suitable segments, as if those segments may some day be included in the National Wild and Scenic River System. Congress conferred no such interim management authority on the BLM. The County recommends that any such statements be substituted with appropriate language indicating that management will be in accordance with the principles of multiple use and sustained yield until such time as Congress may designate for inclusion in the National W&SR system.	Section 5(d) of the Wild and Scenic Rivers Act requires that Federal land management agencies make wild and scenic river considerations during land use planning. Two stages of review are involved. Eligibility is an inventory, solely involving river values. Suitability involves consideration of manageability and resource conflicts. As per BLM Manual 8351-Wild and Scenic Rivers-Policy and Program, Section .32C, all eligible rivers are considered in the EIS for the planning effort as to their suitability for congressional designation into the National Wild and Scenic Rivers System. With any suitability determination made in the ROD for the FEIS/PRMP, the free-flowing, outstandingly remarkable values, and tentative classification of rivers would continue to be protected until Congress makes a decision on designation.	No

WSR – Wild and Scenic Rivers					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
San Juan County	7	68	Any statements in the DRMP/EIS which purports to prohibit impoundments, diversions, channelizations and rip-rapping on any river segment in San Juan County are particularly offensive to Utah State water law and water rights.	The Wild and Scenic Rivers Act implies a Federal reserved water right; however, it must be the minimal amount necessary for purposes of the Act, it must be adjudicated through State processes, and it would be junior to existing water rights. The amount of Federal right will vary from river to river, depending on the river's flows, the un-appropriated quantities in the river, and the values for which the river is being protected. There is no effect whatsoever on water rights on in -stream flows related to suitability findings made in a land use plan decision, barring Congressional action. Even if Congress were to designate rivers in the National Wild and Scenic Rivers System, any such designation would have no affect on existing, valid water rights. Section 13 (b) of the Wild and Scenic Rivers Act states that jurisdiction over waters is determined by established principles of law. In Utah, the state has jurisdiction over water. Although the Wild and Scenic Rivers Act implies a federal reserved water right for designated rivers, it doesn't require or specify any amount, and instead establishes that only the minimum amount for purpose of the Act can be acquired. Because the State of Utah has jurisdiction over water, BLM would be required to adjudicate the right as would any other entity, by application through state processes. Thus, for Congressionally designated rivers, BLM may assert a federal reserved water right to appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. In practice, however, federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values. During the suitability phase of the Wild and Scenic River process, San Juan County as well as the State of Utah and	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				SITLA, were asked to supply information on uses, "including reasonably foreseeable potential uses of the area and related waters, which would be enhanced, foreclosed, or curtailed if the area were included in the national system of rivers, and the values which could be foreclosed or diminished if the area is not protected as part of the national system." Appendix H summarizes suitability input by the public as well as local communities. Suitability decisions were made considering the results of this input.	
San Juan County	7	69	San Juan County's position is that no river segments on BLM lands in the Monticello Field Office planning area should be recommended as suitable for Congressional classification and designation in the W&SR system.	The Wild and Scenic Rivers Act (WSRA) of 1968, Congress established legislation to protect and preserve designated rivers throughout the United States in their free-flowing condition. Section 5(d)(1) of the WSRA directs federal agencies to consider the potential for national wild, scenic, and recreational river areas in all planning for the use and development of water and related land resources. A full range of alternatives for Wild and Scenic River designation are proposed in the DRMP. The Wild and Scenic River Study Process and a list of authorities and guidelines can be found in Appendix H, beginning on page H-67.	No
Canyon Country Heritage Association	18	2	There are several pages of “comments” about wild and scenic river designation. Specific segments are listed. No substantive comments were given, but a response is offered.	The BLM Monticello Field Office used the 1997 publication A Citizen’s Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council during the evaluation of rivers potentially eligible to become congressionally designated Wild and Scenic Rivers. This information aided in the identification of outstandingly remarkable values for various streams that BLM identified as eligible. In some cases, however, an Interdisciplinary team of resource specialists disagreed with the information or, more often, the significance of the information. In these cases, a rationale is provided in Appendix H. The tentative classification established through inventory for an eligible river will be considered in at least one alternative; however, because a river’s tentative classification provides a	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				framework for the management prescriptions applied within a river area, some flexibility is allowed to consider a range of tentative classifications in the alternatives. The BLM's Wild and Scenic River Manual (Section 8351.33C) states: "Additional alternatives may be formulated for any combination of designations and/or classifications. Whenever an eligible river segment has been tentatively classified, e.g. as a wild river area, other appropriate alternatives may provide for designation at another classification level (scenic or recreational)." Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives (whether BLM's or those of another official entity), continuity of management prescriptions, or other management considerations.	
Grand Canyon Trust	33	2	We strongly recommend closure of the Arch Canyon Road, with its rare perennial desert stream, fish populations are threatened by 59 motorized vehicle stream crossings in eight miles. The remarkable cultural resources in Arch Canyon are also at risk from motorized recreation users and especially during special permitted events where there is increased risk of vandalism and looting from large numbers of uneducated visitors.	The BLM assembled an interdisciplinary (ID) team of resource specialists to assess the impacts of routes upon natural and cultural resources. The DRMP provides a full range of alternatives for motorized use in Arch Canyon. The travel plan designation process can be found in Appendix N, N.5 beginning on page N-5.	No
National Outdoor Leadership School	34	4	Five segments of the San Juan River, from above Bluff to the boundary with the Glen Canyon National Recreation Area, were deemed eligible for designation as either Wild or Recreational through the review process detailed in Appendix H (p. H-94-5). These five segments were found to be suitable for recommendation in Alternative B, but not suitable in the preferred Alternative C. Due to exceptional Remarkably Outstanding Values, NOLS and OIA recommend that the suitability recommendations for the San Juan River in Alternative B be adopted in the final plan.	Alternative B emphasizes the protection/preservation of natural resources, thereby analyzing the impacts of finding all eligible river segments as suitable. Alternative C is the preferred alternative because it provides a balanced approach of protection/preservation of natural resources while providing for commodity production and extraction. As a result, Alternative B includes all eligible river segments as suitable with maximum protection provided for these segments. Alternative C 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	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
				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." Appendix H fully discloses the review and evaluation process for determining which river segments are eligible and suitable for such designation. In Alternative C, 18.4 miles are proposed as suitable for inclusion into the Wild and Scenic System. In the FEIS, in addition to the segments recommended as suitable in Alternative C, segment 5 of the San Juan River is recommended as suitable for a total of 35.7 miles.	
Canyon Country Heritage	43	2	Discrepancy Note - CCHA, reading the DRMP, is curious about the number of waterways which truly were investigated? Page H-71, Volume 3, Appendix H states: "The starting point for the 2003 MFO WSR evaluation process was the 1992 list of 164 field office area watercourses." But on page H-74, Volume 3, Appendix H - this; "The ID team subject matter specialists evaluated whether or not ORV's exist for each of the 167 river(s)/segments." Also from Volume 3, Appendix H (page H-74) "From this list (authors note: referring to the original 164/167) 21 river(s)/segments were initially identified as potentially eligible…16 were determined eligible and 2 not eligible…three evaluated river/segments were combined into a single river area…" If one totals these numbers, it equals 22 (or, if combining segments as did the BLM, 20) CCHA wonders about the lost waterways?	The commenter is mistaken about the number of river(s)/segments found not eligible. The BLM Monticello Field Office began with 21 river(s)/segments. Three of these segments were combined into a single river area, leaving 19 river(s)/segments to be reviewed. Of these 19, 16 were determined eligible and 3 not eligible (Lake Canyon, South Cottonwood Canyon, and Montezuma Creek). (Appendix H, Section H.1.5.3 Identification of Outstandingly Remarkable Values (ORVs), page H-74, second paragraph).	No
Canyon Country Heritage	43	3	The odd thing is that in the Moab DRMP, Appendix J (Wild and Scenic Rivers study Process) page J-38, Colorado River Segment #5 "River mile 44.5 to mile 38.5 at State Land	Please refer to Map 46. Mileage differs because of different Field Office boundaries and the boundary of Canyonlands National Park.	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			Boundary" the BLM River Miles add up to "6.1" (sic). Contrast that with the MFO DRMP, (Volume 3, page H91, Attachment 2) Segment #2 "State lands near River Mile 44 to approx. River Mile 38.5" - for a total of only 5.5 miles. Referring again to the Moab DRMP, Appendix J, page J-39, Colorado River Segment #6 "From State land at river mile 37.5 to mile 34 at Canyonlands National Park Boundary" -- which equals a total of 3.5 miles (although Moab BLM states "3.8" miles). Contrast that with the MFO DRMP, (Volume 3, page H91, Attachment 2) "River Mile 37.5 west of State school section to boundary of Canyonlands NP near River Mile 31" -- which totals 6.5 ,miles. CCHA is curious as to the boundary of Canyonlands National Park? Did it move between the printing of the Moab DRMP and the Monticello DRMP? It appears that if one takes the Moab DRMP Colorado River Miles, which total only 9.98)according to their addition) and add those to the Dark Canyon WSR miles (6.4) we have a grand total of merely 16.3 River Miles deemed "Suitable" for Wild and Scenic Status. Et MFO chooses to represent these same miles as totaling 18.4. CCHA wonders if MFO is intentionally misleading the public, or is content to simply mislead themselves?		
Canyon Country Heritage	43	4	CCHA also notices that MFO speaks of the WSR area in terms of "River Miles" and acres (8528 protected under Alternative E) yet the SRMA refers to "acres" but fails to mention the amount of "River Miles" which would receive even the slightest protection. The SRMA refers to "acres" but fails to mention the amount of "River Miles" which would	In the proposed plan, the San Juan River will have a combination of management prescriptions. The majority of the river will be within the SRMA and Section 5 of the river will be recommended as suitable for Wild designation and not part of the SRMA. The boundaries of a suitable recommendation are set by the Wild and Scenic law.	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			receive even the slightest protection. The SRMA mentions the "San Juan River" would encompass "9,859 acres" (Volume 1, Chapter 2, page 2-23, Alternative C) but also states "The SRMA would include the 'Hole in the Rock Trail'" (authors note, a "trail" very much in dispute), that the boundary would be changed to match the "D4600 Motorized Trail" (authors note, a "trail" we are still attempting to place) and that the "No Surface Occupancy (NSO) for oil and Gas Leasing Category III" would drop to "below the bench". CCHA turned to the "Maps" section of your DRMP (Volume 3) and referred to Maps 32 (SRMA Alternative C) and 46 (Wild and Scenic Rivers)/ T the untrained eye, it certainly looks as if, while a WSR designation would protect the RIVER and the 1/4 mile of land from the high water mark on each side of same, the SRMA concentrates on the LAND in pockets surrounding the river, and lifts protection for a vast amount of waterway.	Boundaries of an SRMA are set by an interdisciplinary team.	
The Nature Conservancy	49	14	Colorado River Segment 1 (352 acres): Make suitability determination for each as provided under Alternative B, as an additional layer of conservation for the Endangered and Sensitive native warm-water fish species that inhabit the Colorado River, and to ensure consistent river management between the Moab and Monticello Field Offices.	Please refer to response to comment 34-4.	No
The Nature Conservancy	49	15	San Juan River Segment 1-5 (8,528 acres): Make suitability determination for each as provided under Alternative B, as an additional layer of conservation for the Endangered and Sensitive native warm-water fish species that inhabit the San Juan River.	Please refer to response to comment 34-4.	No
The Nature Conservancy	49	16	Indian Creek (1,536 acres), Fable Valley (2,176 acres), and Dark Canyon (2,048 acres): Make suitability determination for each as provided under Alternative B. All of these stream reaches and watersheds were identified in our Colorado Plateau ecoregional assessment as important for conservation of several special-status species (including	Please refer to response to comment 34-4.	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			plants), riparian habitats and freshwater ecological systems.		
The Nature Conservancy	49	17	Arch Canyon (2,208 acres): Make suitability determination under Alternative B, as an additional layer to protect the active breeding and nesting pair of Mexican spotted owls (Strikx occidentalis lucida), a federally listed Threatened species.	Please refer to response to comment 34-4.	No
Utah Rivers Council	52	1	The Monticello Field Office has no basis or rationale for finding certain rivers as not suitable simply because the river is located in an area where some other administrative or congressional protection already exists or is proposed to exist. The Council urges the Monticello Field Office to find all segments of the San Juan River, Dark Canyon, and Arch Canyon as suitable to become a Wild and Scenic River.	Appendix H fully discloses the review and evaluation process for determining which river segments are eligible and suitable for such designation.	No
Utah Rivers Council	52	10	The responses to the factors are not all complete. On page H-114, the Monticello Field Office states that the costs of acquisition is unknown at this time, or whether there is any need to acquire land. Based on this paucity of information the BLM Monticello Field Office has found all segments of the San Juan as not suitable. This is an arbitrary decision since this information is not even known.	The DRMP was completed using the best available information at the time. The data used is believed to be sufficient to make a programmatic analysis of the impacts of multidisciplinary decisions on management direction. In Alternative C, 18.4 miles are proposed as suitable for inclusion into the Wild and Scenic System. In the FEIS, in addition to the segments recommended as suitable in Alternative C, segment 5 of the San Juan River is recommended as suitable for a total of 35.7 miles.	No
Utah Rivers Council	52	11	It appears that the Monticello Field Office's suitability recommendations "for WSR designation" are completely arbitrary in nature. Because of this disconnect, the Draft RMP's suitability determinations are not supported by substantial evidence on the record and so are not defensible.	Please refer to response to comment 52-1.	No
Utah Rivers Council	52	12	The public has not been given a meaningful opportunity to provide substantive comments on the suitability analysis due to the paucity of information in the Draft and the vagueness in terms of interpreting the different factors. The public would	The DRMP was completed using the best available information at the time. The data used is believed to be sufficient to make a programmatic analysis of the impacts of multidisciplinary decisions on management direction.	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			simply be taking a shot in the dark due to the confusing and incompletely nature of the suitability analysis of the Draft.	Appendix H fully discloses the review and evaluation process for determining which river segments are eligible and suitable for designation.	
Utah Rivers Council	52	2	The Council urges the Monticello Field Office to consider eligible rivers upon which there is a pending or potential water resource development project, potential development project, potential transportation project or other developments as suitable to become a Wild and Scenic River under all alternatives. At the very least, potential projects cannot be used as a reason to find a river segment not suitable.	The BLM did not remove any rivers from a suitability determination based on any pending or potential water resource projects, potential projects, or any other developments.	No
Utah Rivers Council	52	3	The suitability analysis for rivers in the Draft RMP considers 7 different factors, which are listed both in the Draft RMP and in BLM Manual 8351.33. Unfortunately, the Draft RMP fails to include one other important factor, the consistency with other agency plans, programs, or policies. Therefore, the Council urges the Monticello Field Office to find the following rivers suitable to become Wild and Scenic Rivers in order to be consistent with other Agency plans: Dark Canyon, Arch Canyon, and the Colorado River.	Appendix H fully discloses the review and evaluation process for determining which river segments are eligible and suitable for such designation.	No
Utah Rivers Council	52	4	The Council requests the Monticello Field Office fully disclose its basis and justification for the suitability determinations made in the Draft RMP, specifically on the decision to find all segments of the San Juan River as not suitable.	Please refer to response to comment 34-4. Segment five of the San Juan River is being recommended as suitable for Wild designation.	No
Utah Rivers Council	52	5	It appears that the Monticello Field Office found all segments of the San Juan not suitable due to the fact that the southern half of the river is Navajo Nation land and supposedly the Navajo Nation opposes Wild and Scenic designation because of the potential in the future of building a water project on the river.	Appendix H fully discloses the review and evaluation process for determining which river segments are eligible and suitable for such designation. In Alternative C, 18.4 miles are proposed as suitable for inclusion into the Wild and Scenic System. In the FEIS, in addition to the segments recommended as suitable in Alternative C, segment 5 of the San Juan River is recommended as suitable for a total of 35.7 miles.	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			The Monticello Field Office should not make its suitability decision based on any potential consequence, but rather should base it on the actual suitability factors. In this case all of the responses to the suitability factors lead to a positive suitability finding. Therefore, the Council urges the Monticello Field Office to find all segments of the San Juan River as suitable to become a Wild and Scenic River.		
Utah Rivers Council	52	6	The suitability analysis is incomplete and inconclusive: The suitability analysis for all segments of the San Juan River is incomplete and inconclusive. The poor suitability analysis for the San Juan River provides no basis, justification, or documentation for the finding that all segments of the San Juan River are not suitable to become a Wild and Scenic River. Thus, the Monticello Field Office's finding all segments of the San Juan River as not suitable are arbitrary and capricious.	Please refer to response to comment 34-4.	No
Utah Rivers Council	52	7	The suitability analysis in Appendix H on pages H-113 to H-114 includes all 5 segments together. By failing to separate out each individual segment it is impossible to determine which segment the information included in the table applies to. It is possible that some of the information may apply to only one segment among the five.	Appendix H on pages H-113 to H-114 has grouped together the five San Juan River Segments.	No
Utah Rivers Council	52	8	Nowhere in the draft documents does the Monticello Field Office share how they evaluated the factors in order to come to a decision about suitability. Nowhere in the Draft does it state how each of the seven suitability factors were evaluated. It is impossible to determine why the Monticello Field Office determined that certain river segments were suitable and other segments were not suitable.	Please refer to response to comment 52-1.	No

WSR – Wild and Scenic Rivers					
Commenter Name	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**	**Doc Mod**
Utah Rivers Council	52	9	While it may be true that the BLM is managing the river in order to protect the river using BLM management prescriptions the BLM has absolutely no means of protecting the free-flowing nature of the river. As stated above, the only type of protection that ensures the free-flow of the river is Wild and Scenic River designation. No other level of protection that the BLM can provide will fully and adequately protect the river and its ORVs. Therefore, the response to this factor should strongly lead to a positive suitability finding for all segments of the San Juan River.	Appendix H fully discloses the review and evaluation process for determining which river segments are eligible and suitable for such designation. In Alternative C, 18.4 miles are proposed as suitable for inclusion into the Wild and Scenic System. In the FEIS, in addition to the segments recommended as suitable in Alternative C, segment 5 of the San Juan River is recommended as suitable for a total of 35.7 miles.	No
Glen Canyon Institute	222	4	The BLM has identified 12 river segments totaling 92.4 miles that are eligible for National Wild and Scenic River designation by the Congress (9. 2-5, 2-46, 2-47). There is ample documentation in Appendix H to justify recommending all of these river segments (p. H-91 to H-103). However, the DRMP recommends only 3 river segments totaling 18.4 miles - just one-fifth of eligible mileage - for Wild and Scenic River designation (pp. 2-5, 2-46, 2-47, 4-408 to 4-411). Changes Needed in the Final Resource Management Plan 1. Recommend as suitable for protection all 12 segments of streams and rivers, totaling 92.4 miles, that are identified in Appendix H as having one or more "outstandingly remarkable values" and eligible for further consideration as Wild and Scenic Rivers in the RMP. The BLM has worked with cooperators to ensure that any effects of decisions regarding Wild and Scenic Rivers are considered. Barring congressional action, there is no effect on water rights or instream flows related to suitability findings made in a land use plan decision. Even if Congress were to	The BLM Monticello Field Office used the 1997 publication A Citizen's Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council during the evaluation of rivers potentially eligible to become congressionally designated Wild and Scenic Rivers. This information aided in the identification of outstandingly remarkable values for various streams that BLM identified as eligible. In some cases, however, an Interdisciplinary team of resource specialists disagreed with the information or, more often, the significance of the information. The tentative classification established through inventory for an eligible river will be considered in at least one alternative; however, because a river's tentative classification provides a framework for the management prescriptions applied within a river area, some flexibility is allowed to consider a range of tentative classifications in the alternatives. The BLM's Wild and Scenic River Manual (Section 8351.33C) states: "Additional alternatives may be formulated for any combination of designations and/or classifications. Whenever an eligible river segment has been tentatively classified, e.g. as a wild river area, other appropriate alternatives may provide for designation at another classification level (scenic or recreational)." Reasons for considering alternative tentative classifications include resolving conflicts with other	No

WSR – Wild and Scenic Rivers					
Commenter Name	Record ID & Comment Number		Comment Text	Response to Comment	Doc Mod
			designate rivers into the National Wild and Scenic Rivers System, any such designation would have no effect on existing water rights. Section 13(b) of the Wild and Scenic River Act states that jurisdiction over waters is determined by established principles of law. In Utah, the State has jurisdiction over water. Although the Wild and Scenic Rivers Act implies a Federal reserved water right for designated rivers, it does not require or specify any amount, and instead establishes that only the minimum amount for purposes of the Act can be acquired. Because the State of Utah has jurisdiction over water, the BLM would be required to adjudicate the right, as would any other entity, by application through State processes. Thus, for congressionally designated rivers, the BLM may assert a Federal reserved water right for appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. In practice, however, Federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values.	management objectives (whether BLM's or those of another official entity), continuity of management prescriptions, or other management considerations. All streams in the Monticello Field Office were given consideration (including riparian areas) for their potential designation as a Wild and Scenic River. Appendix H fully discloses the review and evaluation process for determining which are eligible and suitable for such designation.	