

**Appendix H – Letters Documenting  
Compliance Regarding Lands with  
Wilderness Characteristics**

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# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

Color Country District Office

Cedar City Field Office

176 East DL Sargent Drive

Cedar City, UT 84721

Telephone (435) 865-3000

[www.blm.gov/ut/st/en/fo/cedar\\_city.html](http://www.blm.gov/ut/st/en/fo/cedar_city.html)

**In Reply Refer To:**

UTU-83067

2800

UTC010

March 17, 2011

To: Project Manager, Sigurd to Red Butte Transmission Line

From: Field Manager, Cedar City Field Office

Subject: Review of alternatives for the proposed Sigurd to Red Butte Transmission Line for lands with Wilderness Characteristics

The Cedar City Field Office has reviewed the alternatives for the proposed Sigurd to Red Butte transmission line for both the size and naturalness criteria associated with lands with wilderness characteristics. In compliance with Secretarial Order 3310, the alternative routes have been determined to be located on lands which clearly lack wilderness characteristics because these lands do not meet wilderness character inventory size criterion, or they lack the appearance of naturalness due to existing development.

This review was completed on March 16, 2011, and evaluated all lands traversed by the proposed action or alternatives for the proposed action for both size and naturalness.

To determine size of potential units, lands were screened against roads, major infrastructure (transmission lines, major buried pipelines), and private lands. Only one area transected by the Sigurd to Red Butte Alternatives had 5000 acres of contiguous BLM lands. The project area traversing this unit was then screened for development which might preclude the existence of wilderness characteristics. This area was previously inventoried for wilderness characteristics. A record search of the 1979 wilderness characteristics inventory unit UT-040-168 provides the following information:

Unit UT-040-168

This unit contains the Bradshaw and Lincoln mining districts. Within the unit are approximately 1000 acres of patented claims, with numerous roads penetrating the unit to access them. In addition, the area is traversed by a transmission line, contains communications towers, and numerous constructed range improvements.

The concentration of developments within the unit clearly demonstrates a lack of wilderness characteristics. Additional sources used in the evaluation of naturalness included aerial photography, data regarding existing major development (e.g., existing transmission lines, major cross-country energy pipelines), and field data.

In summary, most lands within the proposed project area are less than 5,000 acres in size, and are not adjacent to any other lands with wilderness characteristics. Further, the lands lack naturalness due to pre-existing and highly visible intrusions (e.g., material sites, roads, etc.).

A handwritten signature in black ink, reading "Randy M. Aguillo". The signature is written in a cursive style with a large, sweeping initial "R".

Cc:

Todd Christensen, Color Country District Manager  
Rob Wilson, Lands and Realty Specialist, Cedar City Field Office  
Bernice Sterin, Natural Resource Specialist, Utah State Office  
EPG, 208 East 800 South, Salt Lake City, UT 84111



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT

ST. GEORGE FIELD OFFICE

345 East Riverside Drive

St. George, Utah 84790



In Reply Refer to:

March 17, 2011

Bureau of Land Management  
Attention: Tamara Gertsch, Project Lead  
Sigurd-Red Butte Project  
5353 Yellowstone Rd  
PO Box 1828  
Cheyenne, Wyoming 82003

Dear Tamara,

This letter is in regards to the Rocky Mountain Power, Sigurd-Red Butte Project. It will provide written documentation from the St. George Field Office (SGFO) regarding Secretarial Order #3310, which was issued by the Department of Interior on December 23, 2010. This Order requires that all current projects conduct a wilderness characteristics inventory.

The proposed southern terminus of the Sigurd to Red Butte Power line project crosses the northern boundary of the St. George Field Office. This area was previously inventoried for wilderness characteristics. A record search of the 1979 wilderness characteristics inventory unit UT-040-043 provides the following information:

#### Unit UT-040-043

B) Naturalness Analysis – The imprint of man’s work is substantially noticeable throughout the inventory unit. The extensive network of roadways and transmission line effectively combine to subdivide the unit. The chaining and drilling sites also impact any potential naturalness. These developments, in combination, impact the unit to the extent that the wilderness characteristic of naturalness is lacking.

The SGFO is currently undertaking a field office wide inventory of wilderness characteristics in support of an RMP amendment. The preliminary analysis has already eliminated this area for the same reasons identified in the 1979 inventory. In addition, this area would not qualify as Lands with Wilderness Characteristics (LWC) under Manual 6301 since it is less than 5,000 acres and is not contiguous with lands which have been formally determined to have wilderness or potential wilderness values.

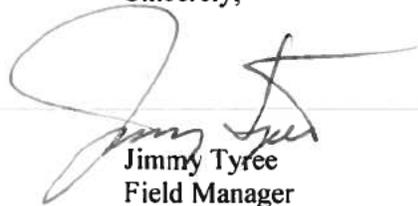
It should be noted that the Utah Wilderness Coalition submitted an updated wilderness proposal for the St. George Field Office following passage of the Omnibus Public Lands Bill of 2009 (P.L. 111-11). Their updated submission removed those lands which Congress had designated as wilderness under the Omnibus Bill. That proposal differs significantly from their 2011 proposal which is being used for the Sigurd-Red Butte Project. The inventory unit referenced above was

one of those differences. This unit was not proposed by the UWC in their submittal to the SGFO that occurred after passage of the Omnibus Bill. For the purpose of this analysis, the data supplied by EPG is considered new information.

#### Conclusion

The review of this project was conducted on March 16, 2011 by the SGFO Outdoor Recreation Planner to determine if wilderness characteristics were present. It was determined that the conditions within the identified unit have not changed. The new information provided by the Utah Wilderness Coalition does not affect this determination. Additional inventory does not need to be conducted due to the lack of naturalness and failure to meet the 5,000 acre minimum.

Sincerely,



Jimmy Tyree  
Field Manager

Attachment:  
Map

cc:

Todd Christensen, Color Country District Manager  
Rob Wilson, Lands and Realty Specialist, Cedar City Field Office  
Bernice Sterin, Natural Resource Specialist, Utah State Office  
EPG, 208 East 800 South, Salt Lake City, UT 84111



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
FILLMORE FIELD OFFICE  
95 East 500 North  
Fillmore, Utah 84631



In Reply Refer to:  
2800  
(UTW02000) UTU-83067

March 17, 2011

Bureau of Land Management  
Attention: Tamara Gertsch, Project Lead  
Sigurd-Red Butte Project  
5353 Yellowstone Rd  
PO Box 1828  
Cheyenne, Wyoming 82003

Dear Tamara,

This letter is in regards to the Rocky Mountain Power, Sigurd-Red Butte Project. It will provide written documentation from the Fillmore Field Office (FFO) regarding Secretarial Order #3310, which was issued by the Department of Interior on December 23, 2010. This Order requires that all current projects conduct a wilderness characteristics inventory.

The proposed Sigurd to Red Butte Power line project crosses through two areas previously inventoried along Black Rock Road in the Fillmore Field Office (FFO) for wilderness characteristics. A record search of the 1979 wilderness characteristics inventory units UT-050-170 and UT-050-170 A, Antelope Mountain-Mineral Mountains, provides the following information:

Unit UT-050-170

- a) Unit Evaluation - The area obviously and clearly does not meet the criteria for identification as a Wilderness Study Area. This unit embraces an historic mining district in the Millard and Beaver counties. The presence of mines and prospects is extensive throughout the area. Because of the established mining activities, the Unit obviously and clearly lacks the criterion for "naturalness".
- b) Unit Recommendation – The area obviously and clearly does not meet the criteria for identification as a Wilderness Study Area. The area is recommended as not qualifying for further inventory and should be dropped from the wilderness review process.

Unit UT-050-170 A

- a) Unit Evaluation – The area obviously and clearly does not meet the criteria for identification as a Wilderness Study Area. Because of the numerous roadways entering this Unit from adjacent private lands, the Unit obviously and clearly lacks the wilderness characteristic of “naturalness”
- b) Unit Recommendation - The area obviously and clearly does not meet the criteria for identification as a Wilderness Study Area. The area is recommended as not qualifying for further inventory and should be dropped from the wilderness review process.

Units UT-050-168, 172, and 176

There are no files on record for these three units. However, the Richfield District Wilderness Initial Inventory document recommendations identify all three units as “not recommended” for further analysis. Documentation for Unit UT-050-172 states that this unit “has 30 miles of well travelled roads that eliminate naturalness. Interstate 15 and the Town of Cove Fort are adjacent to the unit. This is not recommended for intensive inventory”.

Conclusion

The review of this project was conducted on March 2, 2011 by the FFO ID team to determine if wilderness characteristics were present. It was determined that conditions of the above identified units had not changed. During the review process for this project no new information or citizen proposals with new information have been brought forward. The proposed route does not meet the criteria as a wilderness area. Additional wilderness character inventory was not conducted due to the lack of naturalness.

Sincerely,



Michael D. Gates  
Field Manager

Attachment:  
Map

cc:

Todd Christensen, Color Country District Manager  
Bernice Sterin, Natural Resource Specialist, Utah State Office  
EPG, 208 East 800 South, Salt Lake City, UT 84111

# Fillmore Field Office 1979 BLM Wilderness Inventory Units

## PROJECT FEATURES

-  Alternative Routes Being Considered
-  Link Node
-  Link Number

## WILDERNESS INVENTORY

-  Wilderness Inventory Units

## LAND OWNERSHIP

-  Bureau of Land Management
-  Indian Reservation
-  Private
-  State of Utah Trust Lands
-  State Park
-  U.S. Forest Service

## GENERAL REFERENCE FEATURES

-  Project Area
-  500kV +/- DC Transmission Line
-  345kV Transmission Line
-  138 to 161kV Transmission Line
-  Pipeline
-  BLM Field Office Boundary
-  County Boundary
-  Interstate & U.S. Highway
-  State Highway
-  Railroad
-  Lake, Pond, or Reservoir

**SOURCES:**  
Wilderness Inventory: BLM, 1979  
Transportation: Streetmap 50K to 250K, 2008  
Land Jurisdiction: BLM State Office Utah, 2008  
POWERmap, powermap.platts.com  
©2007 Platts, A Division of The McGraw-Hill Companies

**NOTES:**  
Substation locations are schematic and do not necessarily represent precise locations.



Date Last Revised: March 2010

PRELIMINARY DRAFT

## SIGURD TO RED BUTTE NO. 2 345kV TRANSMISSION PROJECT DEIS



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United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
**Color Country District Office**  
**Richfield Field Office**  
150 East 900 North  
Richfield, Utah 84701  
Telephone (435) 896-1500  
[www.ut.blm.gov](http://www.ut.blm.gov)



In Reply Refer To:  
2800  
UTU-87238  
UTC020

January 31, 2011

Tamara Gertsch  
Realty Specialist  
Bureau of Land Management  
Wyoming State Office  
5353 Yellowstone Road  
PO Box 1828  
Cheyenne, Wyoming 82003

Dear Ms. Gertsch,

This is in reply to EPG's request regarding the Bureau of Land Management (BLM), Richfield Field Office (RFO) compliance with the new wilderness policy in the proposed Sigurd to Red Butte (SRB) 500kV Transmission Line ADEIS 2.

Two areas located north of Richfield and West of Sigurd, Sevier County, Utah, are depicted on Map MV-15a of ADEIS 2, Volume II as hatched areas and referenced as a Proposed Wilderness Area in the legend of said map.

The information provided by EPG, Justin Peterson's e-mail dated January 19, 2011, indicates the wilderness data was obtained from the Wild Utah Project (2009).

A review of our records, which includes the approved Richfield Field Office (RFO) Resource Management Plan (RMP), indicates a re-inventory document was completed in approximately April 2008, just prior to the approval of the RFO RMP. This re-evaluation was done based on a wilderness proposal submitted by SUWA and Utah Wilderness Coalition (UWC) which includes lands that roughly correspond to the locations submitted by the Wild Utah Project (WUP) as being Units 3 and 4 of the SUWA/UWC proposal. The Wilderness Character of the subject tracts of public land was addressed and provides the following conclusion:

The public lands in units 2, 3, and 4 lack wilderness characteristics of naturalness to some degree, and have no opportunity for primitive recreation to any significant degree. There is opportunity for

solitude since the use levels are so low. There are no supplemental values. These land units do not present significant wilderness characteristic values. Unit 1 is small and isolated from other lands and is not manageable as wilderness.

The BLM acreage is contiguous to a Forest Service "roadless area" designation in the existing Fishlake Forest Management Plan. Established BLM practice with wilderness inventory has consistently recognized other land management agency designations which have officially "designated wilderness areas" or "administratively endorse lands for wilderness management" when considering BLM managed land units that are less than 5,000 acres in size. Other agency designations which may be somewhat protective of environmental resources such as wilderness characteristics but do not "administratively endorse lands for wilderness management" are not considered as providing the same management practices that are required for wilderness management. As part of the interdisciplinary review BLM RFO contacted the Fishlake National Forest (FLNF) to determine what the current management designation of the Forest lands contiguous to the subject BLM managed lands. According to the Forest Service, the area is currently not endorsed for wilderness in this area.

Since the FLNF has determined that the lands which lie within their management cannot be managed as wilderness, these small portions also cannot be managed as wilderness.

Further, the following public land rights-of-way and/or human intrusions are located within and along the southwest side of EPG's two hatched tracts of public land which are located within T. 22 and 23 S., R. 2 W., SLM, and in the general vicinity of the proposed SRB 500kV transmission line alignment (See attached map):

**T. 22 S., R. 2 W., SLM**

<b>Section 33:</b>	SL-063479	Qwest Corp telephone line
	U-57908	FHWA Material Site
	U-59061	FHWA Richfield-Sigurd I-70
	U-033540C	PacifiCorp Richfield-Scipio 46kV Line

**T. 23 S., R. 2 W., SLM**

<b>Section 5:</b>	SL-063479	Qwest Corp telephone line
	U-57909	FHWA Material Site
	U-59061	FHWA Interstate Highway 70
	U-033540C	PacifiCorp Richfield-Scipio 46kV Line
	U-081591	PacifiCorp 138kV Power Line

Also, an isolated parcel of public land connects at the southwest corner of the above described Section 5 and is described as the NE $\frac{1}{4}$ , SE $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 7, T. 23 S., R. 2 W., SLM (200 acres). Intrusions located within this portion of Section 7 is an abandoned material site

that was previously used for material to construct I-70, the Willowood Turf Farm irrigation pipeline ROW UTU-80736, and a portion of a shooting range that extends from private land that Richfield City recently acquired from SITLA. Richfield City tentatively proposes to purchase the remaining described public land in Section 7.

In summary, the lands are less than 5,000 acres in size and are not adjacent to Forest Service lands designated or endorsed as wilderness. Further, the lands lack naturalness due to pre-existing and highly visible intrusions (eg., material sites, roads, ROWs, etc.). Thus the lands lack wild character and are too small to administer as wild lands under the current policy.

Sincerely,

/s/

Wayne A. Wetzel  
Acting Field Office Manager

Enclosure:  
Map

ND:ndemille

