EXHIBIT 1

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

January 23, 2008

DELIVERED BY MAIL

BLM – Richfield Field Office
150 East 900 North
Richfield, UT 84701

Re: Comments on the BLM Richfield Draft Resource Management Plan/Environmental Impact Statement submitted by the Southern Utah Wilderness Alliance, The Wilderness Society, Sierra Club, Southwest Chapter of Public Employees for Environmental Responsibility (PEER), Great Old Broads for Wilderness, Red Rock Forests and the Center for Native Ecosystems, and Forest Guardians (referred to collectively as "SUWA")

Greetings:

Thank you for the opportunity to comment on the Draft Resource Management Plan and Environmental Impact Statement (DRMP/EIS) for the Richfield Field Office. As noted in the DRMP cover letter from the State Director, this will be the first RMP and EIS for the Richfield field Office. These lands are currently managed under four different Management Framework Plans, two RMPs, various amendments and administrative closure orders. SUWA appreciates the BLM's efforts in developing this draft, and believe that an RMP and EIS for the Richfield field office could go far in alleviating many of the resource impacts and conflicts. We welcome a new examination of these impacts, and new solutions to better balance the needs of preservation and development. As detailed below, however, we do not believe that this draft strikes the proper balance between these demands, nor does this draft contain sufficient analysis to demonstrate that the BLM has adequately considered a number of factors relevant to the resource management plan and the travel plan. Nor does it appear that the BLM has collected sufficient information on which to base this draft plan and proposed travel plan.

The Richfield Field Office contains a wide variety of unique, world-renown, and fragile resources that deserve special attention – attention that the BLM does not grant them in this draft plan. Many of these resources occur in the same or similar types of settings, and as a result, simply protecting certain types of ecosystems could go far to ensure that the special aspects of this place remain intact. For example, cultural sites (some 6,000 years old or more), riparian areas and water resources, critical wildlife habitat, and popular hiking trails all co-exist in many canyon bottoms of the Richfield Field Office. Developing protective management strategies for riparian areas – something the BLM's own internal guidance requires – would also protect these other resources. Many of these areas are also included in American's Red Rock Wilderness Act, and the BLM recognizes that most of these areas have wilderness character.

Yet despite the obvious need for protection of these special resources, BLM's draft plan would treat them as if they are ordinary landscapes with no special or unique value or management needs. Indeed, BLM has not even surveyed the cultural sites that would be

Concerning the wilderness characteristics of size for this area, the BLM area presented here is of sufficient size to make it practicable to manage for wilderness character and for potential wilderness designation. Unfortunately, the Utah BLM currently relies on rescinded BLM policies with regards to the requirement of size. The Richfield and Utah BLM should not base the arbitrary exclusion of these areas on the fact that the Forest Service has not yet "administratively endorsed" their portion of the roadless area for wilderness designation, and therefore, these areas would have to meet the size requirements as a "stand alone unit." This arbitrary BLM practice requires that lands within the Forest Service must be currently endorsed for wilderness designation in order for the adjacent Richfield BLM lands to meet the wilderness character and size requirement.

However, the Bureau Manual Handbook, Wilderness Inventory and Study Procedures (H-6310-1), from which this "established" practice is derived has been rescinded. Therefore, this BLM 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.

Now the BLM's current guidance for such situations must rely exclusively on the Wilderness Act and the FLPMA, neither of which contain any requirements that adjacent agency lands must be "administratively endorsed for wilderness" in order to permit cumulative review. Section 2(c)(3) of the Wilderness Act states that an area meets the size definition by having "at least five thousand acres of land or is of sufficient size to make practicable its preservation and use in an unimpaired condition." Further, FLMPA directs the BLM to inventory its landscape for wilderness character. Section 603(c) mandates that the BLM inventory "those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964."

BLM needs to identify the area as retaining wilderness characteristics for all ongoing planning.

Wild Horse Mesa Wilderness Character Unit

SUWA does not have any additional information or comments at this time for the BLM Wild Horse Mesa wilderness character Unit, but may do so in the future if warranted or needed.

Additional Richfield BLM lands that retain and posses wilderness characteristics that have not yet identified for the ongoing Richfield Resource Management Planning process.

Besides the BLM lands within Wildcat Knolls wilderness character units that are contiguous to the roadless areas of the Manti – La Sal National Forest, the Richfield

BLM manages several additional BLM wilderness character units that are contiguous to roadless Forest Service lands. In each instance here, these BLM lands are part of the larger roadless and wilderness character units, but have yet been fully accounted for their wilderness characteristics. As result, the Richfield BLM's current planning effort does not accurately address the resource of wilderness within each of these areas.

For these areas to be identified, SUWA is providing the BLM with significant new information detailing each of these particular areas. As being contiguous to the larger public lands managed by the Forest Service, it's inherent throughout these comments that the wilderness characteristics of solitude and primitive recreation exist already within the Forest Service lands, and therefore, the BLM parcels are not required to posses these values, although nearly every BLM parcel more than likely does. The appearance of these BLM lands and their natural characteristics that are at issue here, and with a comprehensive wilderness character inventory performed on each and every area, its been identified that these areas indeed remain natural in appearance and posses this wilderness characteristics.

Concerning the wilderness characteristics of size, each of the BLM areas presented and supplied here are all of sufficient size to make them practicable to manage for wilderness character and for potential wilderness designation. Unfortunately, the Utah BLM currently relies on rescinded BLM policies with regards to the requirement of size. The Richfield and Utah BLM should not base the arbitrary exclusion of these areas on the fact that the Forest Service has not yet "administratively endorsed" their portion of the roadless area for wilderness designation, and therefore, these areas would have to meet the size requirements as a "stand alone unit." This arbitrary BLM practice requires that lands within the Forest Service must be currently endorsed for wilderness designation in order for the adjacent Richfield BLM lands to meet the wilderness character and size requirement.

However, the Bureau Manual Handbook, Wilderness Inventory and Study Procedures (H-6310-1), from which this "established" practice is derived has been rescinded. Therefore, this BLM 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.

Now the BLM's current guidance for such situations must rely exclusively on the Wilderness Act and the FLPMA, neither of which contain any requirements that adjacent agency lands must be "administratively endorsed for wilderness" in order to permit cumulative review. Section 2(c)(3) of the Wilderness Act states that an area meets the size definition by having "at least five thousand acres of land or is of sufficient size to make practicable its preservation and use in an unimpaired condition." Further, FLMPA directs the BLM to inventory its landscape for wilderness character. Section 603(c) mandates that the BLM inventory "those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964."

With regards to these BLM parcels, no one has provided this significant information for these wilderness character units until now. Thus this is significant new wilderness character information, which includes the accompanying maps and comments below. With this, SUWA fully expect the Richfield BLM to analyze each of these BLM parcels in conjunction with the contiguous wilderness character units of the Forest Service public lands. Failure to do so reflect an incomplete assessment of the wilderness resource present within the Richfield field office and its ongoing planning efforts and violates FLPMA.

South Sevier Plateau Wilderness Character Unit

***See* Exhibit D for Maps**

***See* Map A, South Sevier Plateau -** South of the currently identified BLM area of Pole Canyon wilderness character unit lies a large area of BLM lands not yet identified as containing wilderness characteristics. This BLM area, is part of the larger roadless area of public lands within the Dixie National Forest and a RARE II area, retains an overwhelming natural appearance and character. Native vegetation, undulating topography and areas free of any significant human impacts create an overwhelming natural area that retains wilderness characteristics.

This BLM parcel is located within:

Parcel 1 - T31S R2W, Sections 21, 22, 27-31, 33 and 34
T32S R2W, Sections 3-11, 14, 15, 17-23, and 27-30

As part of the Richfield's ongoing RMP process, all BLM lands that contain a wilderness resource must be identified. The Richfield BLM can not strictly rely on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness for this area. If BLM continues with the current practice of this, then BLM relies on incorrect rational and BLM will not account for the full range of lands retaining wilderness character. Concerning these contiguous BLM and other public land situations, we've requested documentation of BLM's policy that guides BLM's decisions in these situations, but Utah State Office personnel stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service RARE II area is not justified. It's not the future management of these lands at issue it's the identification of a wilderness resource.

The Wilderness Act (c)(3) states that an area meets the size definition, by having "...at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "...those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964..."

Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. Here, SUWA provides the Richfield BLM with supplemental and new information for the areas

North Sevier Plateau Wilderness Character Unit

See Maps B and C – The vast majority of the flanks or lower portions of the North Sevier Plateau is managed by the Richfield BLM. Within these areas, 20 separate BLM parcels have been identified that are part of the larger roadless and wilderness character units. These BLM areas are indicated on the accompanying Maps B and C as highlighted in yellow with red demarking wilderness character boundaries.

Of these 20 BLM parcels, there are a total of eight separate wilderness character units in total, all located within these BLM lands and adjoining and contiguous public lands managed by the Fish Lake National Forest.

These 20 BLM parcels are located within:

Parcel 1 – T27S R1W, Sections 30 and 31
T28S R1W, Sections 5-8, 17-19, and 30,
T28S R2W, Sections 1, 11, 12, 23-26, and 35
Parcel 2 – T29S R2W, Sections 1, 10-12, 14, 15, and 17
Parcel 3 – T29S R2W, Sections 21-23, 26-28, 34 and 35
T30S R2W, Sections 3-10, and 17
Parcel 4 – T29S R3W, Sections 28, 33 and 34
Parcel 5 – T28S R3W, Sections 20, 29-32
T29S R3W, Sections 3-6
Parcel 6 – T28S R3W, Sections 7 and 20
Parcel 7 – T28S R3W, Sections 6-8
T28S R4W, Section 12
Parcel 8 – T27S R4W, Sections 12 and 13
Parcel 9 – T26S R3W, Sections 17-21, and 29
Parcel 10 – T25S R3W, Sections 33
T26S R3W, Sections 4, 8, 9 and 17
Parcel 11 – T25S R3W, Sections 22, 27, 33, and 34
Parcel 12 – T25S R3W, Sections 11 and 14
Parcel 13 – T24S R2W, Sections 30-32
T24S R3W, Section 25
Parcel 14 – T24S R2W, Sections 21, 22, 28 and 29
Parcel 15 – T24S R2W, Sections 13, 14, 22-24
Parcel 16 – T24S R1W, Sections 20 and 29
Parcel 17 – T25S R1W, Section 22
Parcel 18 – T25S R1W, Section 35
Parcel 19 – T26S R1W, Sections 27, 33, and 34
T27S R1W, Sections 3 and 4
Parcel 20 – T27S R1W, Sections 17, 19 and 20

Each of these BLM parcels retain natural characteristics and are not significantly impacted by human activity.

As part of the Richfield's ongoing RMP process, all BLM lands that contain wilderness resources must be identified. The Richfield BLM can not strictly rely on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness for this area. If BLM continues with the current practice of this, then BLM relies on incorrect rational and BLM will not account for the full range of lands retaining wilderness characteristics. Concerning these contiguous BLM lands with other public land situations, we've requested documentation of BLM's policy that guides BLM's decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II areas and Forest Service roadless areas is not justified. The future management of these lands is not at issue, but the identification of a wilderness resource is.

The Wilderness Act (c)(3) states that an area meets the size definition, by having "…at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "…those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964…"

Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. Here, SUWA provides the Richfield BLM with supplemental and new information for the areas.

Tushar Mountains Wilderness Character Units

See Maps D and E, Tushar Mountains - Just west of Piute Reservoir and along the benchlands of City Creek Peak and Circleville Peak remains several natural BLM parcels that are part of a larger roadless and wilderness character unit. Each of these seven BLM parcels is managed by the Richfield BLM. These BLM areas are indicated on the accompanying Map D as highlighted in yellow with red demarking wilderness character boundaries.

Consisting of two wilderness character unit, these seven BLM parcels are all located within these BLM lands and adjoining and contiguous public lands managed by the Fish Lake National Forest.

These 5 BLM parcels are within:

Parcel 1 – T27S R5W, Sections 13, 14, 24 and 25

Parcel 2 – T28S R4W, Sections 19, 20 and 29
Parcel 3 – T28S R4W, Section 29
Parcel 4 - T28S R4W, Section 29
Parcel 5 – T29S R4W, Sections 5, 6 and 8
Parcel 6 – T29S R4W, Sections 7, 8, and 17-19
Parcel 7 – T30S R5W, Sections 10, 11, 14 and 15

Each of these BLM parcels retain a natural characteristic and are not significantly impacted by mans activity.

As part of the Richfield's ongoing RMP process, all BLM lands that contain wilderness resources must be identified. The Richfield BLM can not strictly rely on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness for this area. If BLM continues with the current practice of this, then BLM relies on incorrect rational and BLM will not account for the full range of lands retaining wilderness characteristics. Concerning these contiguous BLM lands with other public land situations, we've requested documentation of BLM's policy that guides BLM's decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II areas and Forest Service roadless areas is not justified. The future management of these lands is not at issue, but the identification of a wilderness resource is.

The Wilderness Act (c)(3) states that an area meets the size definition, by having "…at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "…those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964…"

Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. Here, SUWA provides the Richfield BLM with supplemental and new information for the areas.

Aquarius Plateau Wilderness Character Units

See Maps F, G and H, Aquarius Plateau – East of the community of Antimony consists of three separate BLM parcels that contain wilderness characteristics. Each of these BLM parcels are part of two larger wilderness character units that contain additional public lands within Dixie National Forest, an agency with the ability to manage lands for wilderness under the Wilderness Act.

In addition to these, the BLM lands surrounding the Aquarius Plateau have another 11 parcels that are part of the larger roadless and wilderness character units. These are near

the communities of Bicknell, Torrey and Grover. In all, these remaining BLM parcels surrounding Boulder Mountain overwhelmingly are natural. To date, the BLM has never fully accounted for these BLM parcels as possessing or retaining wilderness values. Therefore, we provide substantive information on these areas. Each of these parcels are indicated on the accompanying Maps F, G and H as highlighted in yellow with red demarking wilderness character boundaries.

These 14 BLM parcels are located within:

Parcel 1 – T32S R1W, Sections 7, 18, and 19
T32S R2W, Sections 24 and 25
Parcel 2 – T31S R1W, Sections 30 and 31
T31S R2W, Section 25
T32S R1W, Section 6
Parcel 3 – T31S R1W, Sections 6, 7, 18 and 19
T31S R2W, Sections 12, 13, and 24
Parcel 4 – T30S R2E, Sections 1, 12-14, 23-26 and 35
T31S R2E, Section 3
Parcel 5 – T29S R3E, Sections 30 and 31
Parcel 6 – T29S R3E, Section 29
Parcel 7 – T29S R3E, Sections 17, 20, 21, 29 and 30
Parcel 8 - T29S R3E, Section 15
Parcel 9 - T29S R3E, Sections 13 and 14
T29S R4E, Section 18
Parcel 10 – T30S R5E, Section 6
Parcel 11 - T30S R5E, Sections 5 and 6
Parcel 12 - T30S R5E, Sections 11-14
T30S R6E, Section 18
Parcel 13 - T30S R6, Sections 17 and 18
Parcel 14 - T30S R6, Sections 27, 34 and 35

Each of these BLM parcels retain a natural characteristic and are not significantly impacted by mans activity.

As part of the Richfield's ongoing RMP process, all BLM lands that contain wilderness resources must be identified. The Richfield BLM can not strictly rely on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness for this area. If BLM continues with the current practice of this, then BLM relies on incorrect rational and BLM will not account for the full range of lands retaining wilderness characteristics. Concerning these contiguous BLM lands with other public land situations, we've requested documentation of BLM's policy that guides BLM's decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II areas and Forest Service roadless areas is not justified. The future management of these lands is not at issue, but the identification of a wilderness resource is.

The Wilderness Act (c)(3) states that an area meets the size definition, by having "…at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "…those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964…"

Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. Here, SUWA provides the Richfield BLM with supplemental and new information for the areas.

Thousand Lakes Mountain Wilderness Character Units

See Map I, Thousand Lake Mountain – Thousand Lake Mountain is a prominent geological feature within Southern Utah. Within this region, large areas of land retain a wilderness character and resource. Not only are these wilderness values including with the Forest Service lands, but additional includes BLM lands. Each of the five parcels are part of a larger roadless and wilderness character units, all of which area managed by the Richfield BLM. These BLM areas are indicated on the accompanying Map I as highlighted in yellow with red demarking wilderness character boundaries.

Consisting of two wilderness character unit, these five BLM parcels are all located within these BLM lands and adjoining and contiguous public lands managed by the Fish Lake National Forest.

These 5 BLM parcels are located within:

Parcel 1 – T27S R3E, Sections 11, 14, and 23
Parcel 2 – T27S R3E, Section 26
Parcel 3 – T27S R3E, Section 34
T28S R3E, Sections 3, 9, 10, and 15
Parcel 4 – T28S R3E, Sections 15, 22, and 25-27
Parcel 5 – T28S R3E, Section 25

Each of these BLM parcels retain a natural characteristic and are not significantly impacted by mans activity.

As part of the Richfield's ongoing RMP process, all BLM lands that contain wilderness resources must be identified. The Richfield BLM can not strictly rely on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness for this area. If BLM continues with the current practice of this, then BLM relies on incorrect rational and BLM will not account for the full range of lands retaining wilderness characteristics. Concerning these contiguous BLM lands with other public land situations, we've requested documentation of BLM's

policy that guides BLM's decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II areas and Forest Service roadless areas is not justified. The future management of these lands is not at issue, but the identification of a wilderness resource is.

The Wilderness Act (c)(3) states that an area meets the size definition, by having "…at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "…those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964…"

Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. Here, SUWA provides the Richfield BLM with supplemental and new information for the areas.

Wasatch Plateau Wilderness Character Units

See Map J, Wasatch Plateau – Located along Highway 72, these three BLM parcels are part of the larger roadless and wilderness character unit, mostly consisting of Forest Service lands. These BLM areas are indicated on the accompanying Map J as highlighted in yellow with red demarking wilderness character boundaries.

Consisting of two wilderness character unit, these three BLM parcels are all located within these BLM lands and adjoining and contiguous public lands managed by the Fish Lake National Forest.

These 3 BLM parcels are located within:

Parcel 1 – T27S R3E, Sections 11, 14, and 23
Parcel 2 – T27S R3E, Section 26
Parcel 3 – T27S R3E, Section 34
T28S R3E, Sections 3, 9, 10, and 15
Parcel 4 – T28S R3E, Sections 15, 22, and 25-27
Parcel 5 – T28S R3E, Section 25

Each of these BLM parcels retain a natural characteristic and are not significantly impacted by mans activity.

As part of the Richfield's ongoing RMP process, all BLM lands that contain wilderness resources must be identified. The Richfield BLM can not strictly rely on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness for this area. If BLM continues with the current

practice of this, then BLM relies on incorrect rational and BLM will not account for the full range of lands retaining wilderness characteristics. Concerning these contiguous BLM lands with other public land situations, we've requested documentation of BLM's policy that guides BLM's decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II areas and Forest Service roadless areas is not justified. The future management of these lands is not at issue, but the identification of a wilderness resource is.

The Wilderness Act (c)(3) states that an area meets the size definition, by having "...at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "...those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964..."

Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. Here, SUWA provides the Richfield BLM with supplemental and new information for the areas.

Thousand Lake Mountain Wilderness Character Units

See Map I, Thousand Lake Mountain – Thousand Lake Mountain is a prominent geological feature within Southern Utah. Within this region, large areas of land retain a wilderness character and resource. Not only are these wilderness values including with the Forest Service lands, but additional includes BLM lands. Each of the five parcels are part of a larger roadless and wilderness character units, all of which area managed by the Richfield BLM. These BLM areas are indicated on the accompanying Map I as highlighted in yellow with red demarking wilderness character boundaries.

Consisting of two wilderness character unit, these five BLM parcels are all located within these BLM lands and adjoining and contiguous public lands managed by the Fish Lake National Forest.

These 5 BLM parcels are within:

Parcel 1 – T27S R3E, Sections 11, 14, and 23
Parcel 2 – T27S R3E, Section 26
Parcel 3 – T27S R3E, Section 34
T28S R3E, Sections 3, 9, 10, and 15
Parcel 4 – T28S R3E, Sections 15, 22, and 25-27
Parcel 5 – T28S R3E, Section 25

Each of these BLM parcels retain a natural characteristic and are not significantly impacted by mans activity.

As part of the Richfield's ongoing RMP process, all BLM lands that contain wilderness resources must be identified. The Richfield BLM can not strictly rely on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness for this area. If BLM continues with the current practice of this, then BLM relies on incorrect rational and BLM will not account for the full range of lands retaining wilderness characteristics. Concerning these contiguous BLM lands with other public land situations, we've requested documentation of BLM's policy that guides BLM's decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II areas and Forest Service roadless areas is not justified. The future management of these lands is not at issue, but the identification of a wilderness resource is.

The Wilderness Act (c)(3) states that an area meets the size definition, by having "...at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "...those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964..."

Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. Here, SUWA provides the Richfield BLM with supplemental and new information for the areas.

Pahvant Range Wilderness Character Units

See Map J, Pahvant Range – These BLM parcels are near the community of Richfield, with each of these being part of the same roadless and wilderness character unit that also encompasses the Forest Service lands. Remaining natural in appearance and character, these parcels have yet to be included within the Richfield DRMP as possessing a wilderness resource. As a result, this information presented here needs to be addressed prior to the final RMP. These BLM areas are indicated on the accompanying Map J as highlighted in yellow with red demarking wilderness character boundaries.

These 4 BLM parcels are within:

Parcel 1 – T22S R2W, Section 3
Parcel 2 – T22S R2W, Sections 10, 13, 14, 22 and 23
Parcel 3 – T22S R2W, Sections 28 and 33
Parcel 4 – T22S R2W, Section 5

Each of these BLM parcels retain a natural characteristic and are not significantly impacted by mans activity.

As part of the Richfield's ongoing RMP process, all BLM lands that contain wilderness resources must be identified. The Richfield BLM can not strictly rely on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness for this area. If BLM continues with the current practice of this, then BLM relies on incorrect rational and BLM will not account for the full range of lands retaining wilderness characteristics. Concerning these contiguous BLM lands with other public land situations, we've requested documentation of BLM's policy that guides BLM's decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II areas and Forest Service roadless areas is not justified. The future management of these lands is not at issue, but the identification of a wilderness resource is.

The Wilderness Act (c)(3) states that an area meets the size definition, by having "...at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "...those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964..."

Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. Here, SUWA provides the Richfield BLM with supplemental and new information for the areas.

IV. TRAVEL MANAGEMENT

A. The DRMP/EIS Overlooks Significant Problems Related to the Use of Off Road Vehicles (ORVs) in the Richfield Planning Area

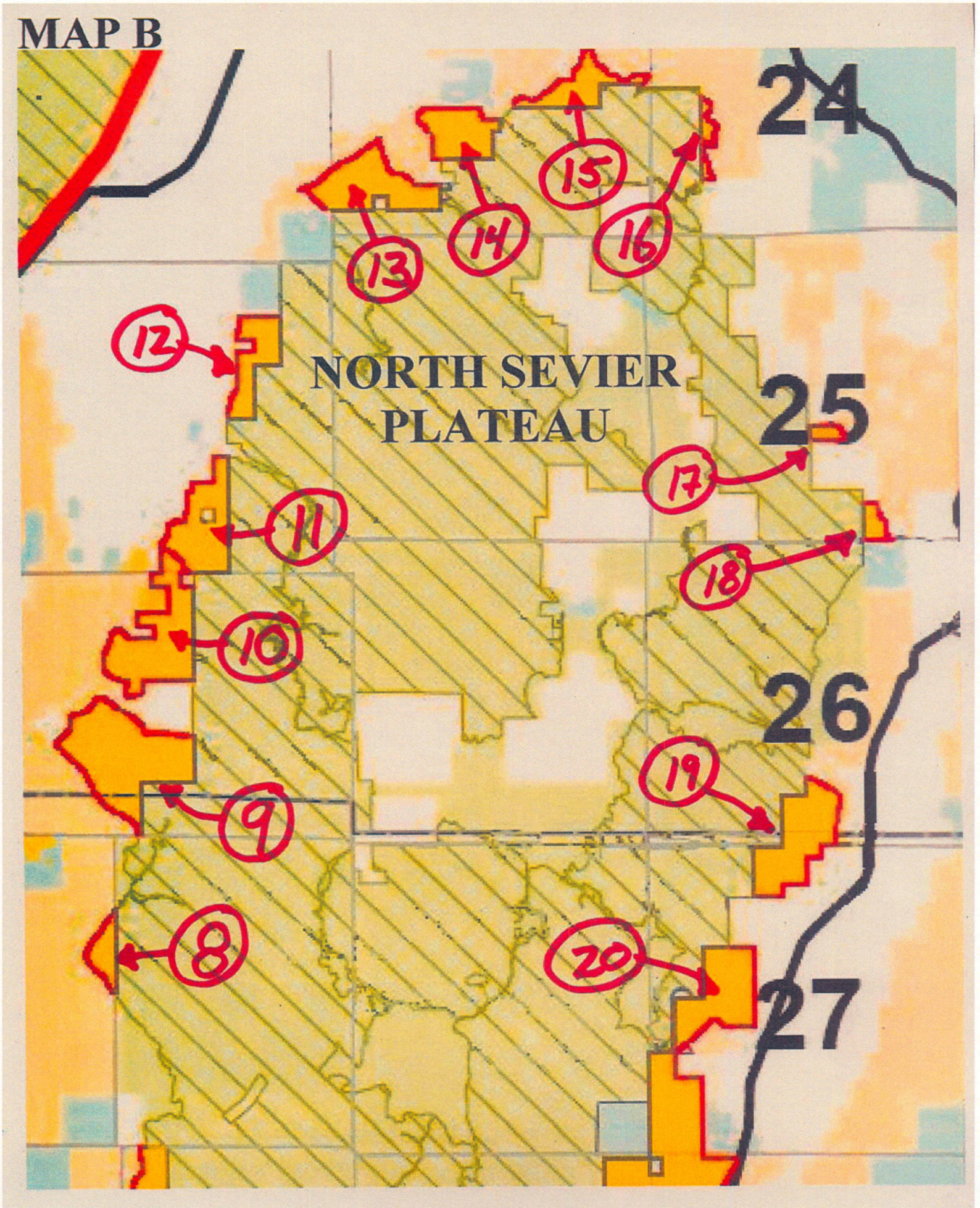
Given the wide-ranging use of the public lands in the Richfield Field Office by off-road vehicles, and the significant damage caused by such use, the BLM's commitment to managing this use while "minimizing" its impact to the environment and to the experience of other non-motorized public lands users, will be the decisive factor in the long-term success of the RMP.

The BLM's decision to move to a designated trail system and largely abandon cross-country use by ORVs is a positive step forward which SUWA supports. However, this new approach will not successfully stem ORV damage and user conflict if the route designations are skewed too far in favor of ORV use. ORV routes must be designated, first and foremost, to protect the resources, promote public safety, and minimize conflicts among users. *See*, 43 C.F.R. § 8342.1. Providing routes and areas for ORV use on

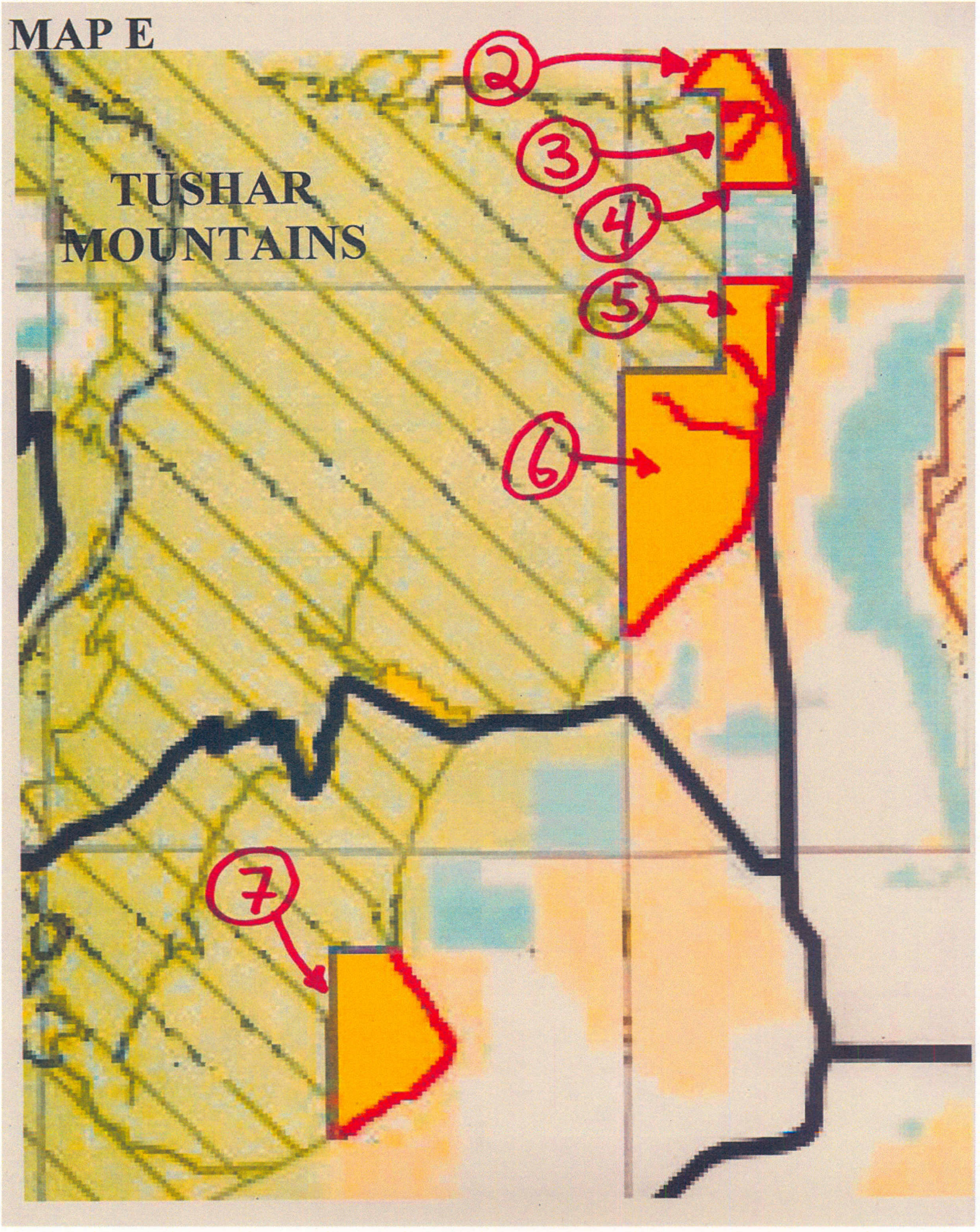
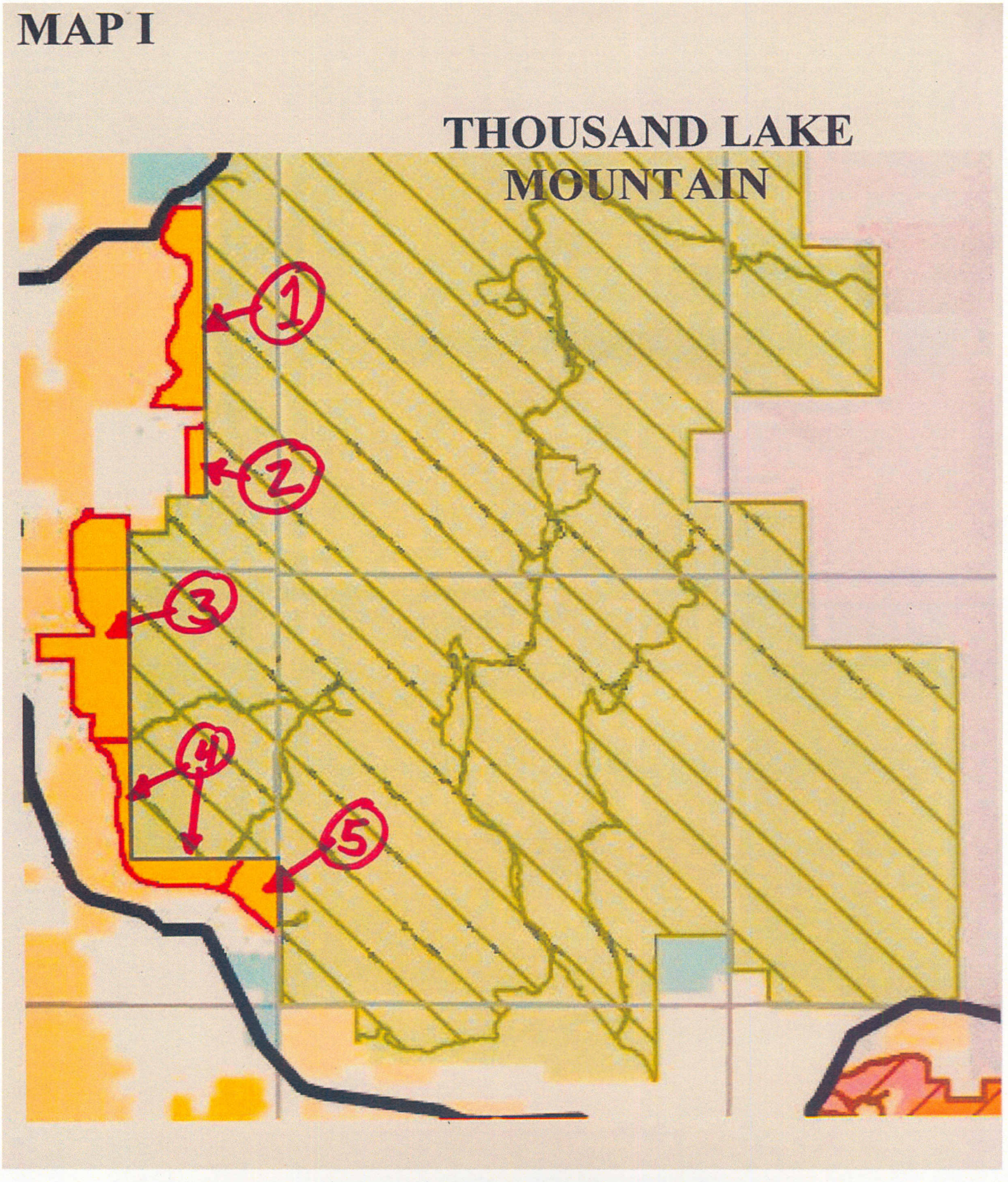
EXHIBIT D

Maps of Additional non-WSA Lands with Wilderness Characteristics

Southern Utah Wilderness Alliance


MAP B
24
15
14
16
13
12
NORTH SEVIER
PLATEAU
25
17
11
18
10
26
19
9
8
20
27

MAP E



MAP I