



southern
utah
wilderness
alliance

BY ELECTRONIC MAIL

February 15, 2013

Juan Palma
Utah State Director
Bureau of Land Management
440 West 200 South, Suite 500
Salt Lake City, Utah 84101-1345

Re: February 2013 Oil and Gas Lease Sale and Wilderness Character of Coyote Wash Area

Director Palma,

The Southern Utah Wilderness Alliance (SUWA) has prepared a thorough wilderness character submission of the Coyote Wash area in southeastern Utah. Please find that submission accompanying this letter. Because this wilderness character submission contains significant new information that the Bureau of Land Management (BLM) has not considered previously, the BLM should withdraw parcels 246, 247, 248, 249, 250, 251, 252, and 253 and withdraw, or modify slightly to exclude wilderness character, parcels 201, 254, and 255 from the proposed February 2013 oil and gas lease sale. These parcels overlap with this identified area of wilderness characteristics.

The BLM's past wilderness character inventories of the Coyote Wash region were only cursory assessments of the area. As SUWA's wilderness character submission demonstrates, this region satisfies the qualifying requirements of both the Wilderness Act and BLM Manual 6310.

SUWA's wilderness character submission constitutes significant new information for three reasons. One, the boundaries and cherry-stems of this area are different than that of the BLM's 1979, 2007, and 2013 reviews. The major human intrusions identified in those previous reviews are excluded from this present proposal. Two, BLM's past wilderness character reviews failed to acknowledge or consider the Colorado BLM's identification of wilderness character in Coyote Wash on the Colorado side of the canyon. The Coyote Wash wilderness character area submission prepared by SUWA is contiguous to this agency-identified wilderness character area in Colorado. Finally, this submission includes on-the-ground photographic and documentation and narrative descriptions of the wilderness character in the area and the insignificance of the few human-related disturbances in that area. This information overrides the improper aerial-photography-based analysis previously prepared by the BLM.

In order to fully comply with the BLM's obligations under the Federal Land Policy Management Act, BLM Manual 6310, and the National Environmental Policy Act the agency should withdraw from consideration parcels 246, 247, 248, 249, 250, 251, 252, and 253 and withdraw, or modify slightly to exclude wilderness character, parcels 201, 254, and 255 in the February 2013 oil and gas lease sale.

I appreciate your consideration of this material. Please feel free to contact me with any questions or concerns that you might have regarding this matter.

Sincerely,

/s/ David Garbett

David Garbett
Staff Attorney

Coyote Wash Wilderness Character Unit

A. Coyote Wash Wilderness Character Unit Boundary Map and GIS Data

The Southern Utah Wilderness Alliance (SUWA) formally submits substantial new information regarding the wilderness characteristics of the Coyote Wash unit, including several detailed maps (Attachment A-C), photographic documentation of the scenic values of the area (Attachment B) and of the potential impacts or lack of impacts and naturalness, and a detailed analysis below in efforts to assist the Bureau of Land Management (BLM) in meeting its mandates under the Federal Land Policy and Management Act (FLPMA) §§ 201 and 202. This information is precisely the sort of “citizen-submitted information” that the BLM must review under its own manual (Manual 6310). As that manual explains, BLM is required to maintain an inventory of wilderness characteristics and this obligation exists “regardless of past inventory.” Manual 6310.06.A. SUWA asks that the BLM review this information and fully consider the wilderness resource that does exist within the Coyote Wash area and utilize this information in correctly identifying the presence of wilderness characteristics.

The detailed information and maps contained in this submission provide the Moab BLM with significant new information regarding the extent of a wilderness resource and wilderness characteristics present within the Coyote Wash wilderness character unit. This information is provided to the BLM for the upcoming February 2013 oil and gas lease sale and informs the environmental analyses prepared for that lease sale: the Moab Field Office, February 2013 Oil and Gas Lease Sale, Environmental Assessment DOI-BLM-UT-Y010-2012-0190-EA (Sept. 2012), and the Monticello Field Office, February 2013 Oil and Gas Lease Sale, Environmental Assessment DOI-BLM-UT-Y020-2012-

0038-EA (Sept. 2012). This new wilderness character information supplements BLM's current information regarding this area. As part of this wilderness character submission, BLM must evaluate this new information prior to its upcoming February oil and gas lease sale. SUWA also provides the BLM with an updated GIS data file, in ARC View format, that represents the data (boundaries) for the Coyote Wash wilderness character unit.

B. Detailed Narrative – Coyote Wash Wilderness Character Unit

1. Area Description

The Coyote Wash wilderness character unit, as submitted, is located along the Colorado/Utah state boundary and includes lands managed by the Moab field office of the BLM. While not known extensively by the visiting public, this landscape consists of many of the redrock features that are present and iconic throughout southeast Utah. Containing multiple deep and incised canyons exist in this wilderness character area including the main landscape feature of Coyote Wash and its many side canyons of Snyder Water Canyon, Lisbon Canyon, Bullhorn Canyon, East Coyote Wash, Spring Canyon, and Horsethief Canyon, the lands remain natural in appears inside the unit boundaries. See Photographs #1-7. These dramatic and rugged landscape features are not easily seen from Highway 191 to the west or Highway 46 to the north. Elevations range from 7,200 feet in the north and higher locations to 5,500 at Coyote Wash as it enters Colorado. Extensive locations are covered by a pinyon juniper forest cover, with large expansive benches consisting of sage and native grasses. Canyons display several riparian areas that include willow and cottonwood trees. See Photograph #3. The naturalness and vastness of the landscape can only be seen, and evaluated, by entering along one of the many dirt routes that enter the region. Natural characteristics do indeed exist despite the many human impact features that surround the Coyote Wash area and

that have been noted in past BLM reviews. Today, there remains a large core area devoid of significant human impacts and locations where large intact areas are absent of any human features at all. See Photographs #1-7. This present naturalness has yet been fully identified by BLM, either in the late 1970's to the more recent cursory reviews in 2007 and again in 2013.

The Coyote Wash area was first assessed by BLM in the late 1970's as UT-060-140. See Attachment D. However, BLM's inventory area appeared to sweep in many human impacts along the periphery of the wild core of this region. As a result, it did not recommend the landscape for further wilderness review. This nearly thirty-three-year-old cursory wilderness review failed to make warranted boundary adjustments that could have resulted on a more thorough and detailed wilderness character inventory of a core wild area that includes Coyote Wash and its many side canyon features.

The next known wilderness character review of this area took place in 2007 when the Moab BLM was revising its resource management plan. See Attachment D. The wilderness character review, like the 1970's review, does not appear to have involved adequate on-the-ground visits of this region. Rather, the BLM performed a less-than-thorough review with GIS data and aerial photographs, once again concluding none of the landscape possessed wilderness characteristics. In fact, in the 2007 wilderness character review, BLM noted that there may have been a core area that was free of significant impacts, but the area was of insufficient size to manage as a stand-alone unit. This too failed to accurately identify the wilderness resource that was and is now indeed present within the center of this region as well as some of its side canyons. Furthermore, instead of performing a more in-depth field review, BLM appeared to skip the identification

question and focus instead on a manageability determination. However, such a questions does not address whether this area possess wilderness character.

Finally, apparently in conjunction with the February 2013 oil and gas lease sale, the BLM produced a one-page Staff Report on the Coyote Wash wilderness character area on January 31, 2013. See Attachment D. This report is a summary of a prior inventory and staff member visits to the region. This report noted that the other BLM staff reported that the potential lease parcels were bisected by existing roads, and were not in a condition to posses wilderness characteristics. There appears to be no documentation of this wilderness character evaluation, no photographs of the routes in question, and no evaluation forms or attempts to identify if some or portions of the evaluation area may retain a wilderness resource. This report contains no information regarding where these BLM staffers visited or what routes they found detrimental to wilderness character. Further, BLM's recent exhaustive review of 2011 GIS-incorporated aerial photos is a good desk exercise to help identify potential lands that may have a wilderness resource but is not definitive. In this case, these aerial photographs have been misleading regarding the wilderness character of the Coyote Wash area.

As SUWA will highlight and detail throughout this submission, these previous wilderness character reviews have been inadequate and have overlooked important information. BLM has yet to identify the important wild core of the Coyote Wash area. See Photographs #1-7.

2. Wilderness Characteristics

a. Size

The Coyote Wash wilderness character unit, as submitted here, is approximately 17,500 acres of contiguous Utah BLM public land, and thus meets the minimum 5,000-acre size requirement of the Wilderness Act Section 2(c)(3) and BLM Manual 6310. Further, the Coyote Wash wilderness character unit, as submitted, is not a stand-alone unit as Moab BLM noted in its March 2007 cursory review. During the Moab BLM 2007 review, the Coyote Wash wilderness character unit was, and is today, contiguous to an exceptionally large natural area in Colorado. Since the 2007 review, Colorado BLM has recently identified wilderness characteristics and values up to the Colorado/Utah state line. See Colorado BLM, Tres Rios Field Office, Lands with Wilderness Characteristics (identifying wilderness character in Coyote Wash from the state boundary east in unit CO-030-290H), *available at* http://www.blm.gov/co/st/en/fo/sjplc/land_use_planning/lwc_inventory.html (last visited on Feb. 14, 2013); Colorado BLM, Tres Rios Field Office, Document of BLM Wilderness Characteristics Inventory Finding of Record, Unit CO-030-290, *available at* http://www.blm.gov/pgdata/etc/medialib/blm/co/field_offices/san_juan_public_lands/documents/lwc.Par.9208.File.dat/Lower_Dolores_LWC_Inventory%206x.pdf (last visited Feb. 14, 2013). This new situation alone represents significant new information compelling BLM to perform a new wilderness character assessment on the contiguous BLM lands in Utah. In total, there are well over 5,000 acres of contiguous BLM lands associated with entire Coyote Wash (Lower Dolores Canyon Lands with Wilderness Character (LWC)) wilderness character unit, which contains the Dolores Canyon Wilderness Study Area as well.

b. Naturalness

The Wilderness Act of 1964 Section 2(c)(1), states that a qualifying area “generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable.” BLM Manual 6310 further describes BLM’s naturalness evaluation for areas. When done correctly and with significant and several cumulative impact areas being excluded from the unit boundaries properly, the Coyote Wash wilderness character unit meets the required criteria for naturalness. Overwhelmingly, natural values do indeed remain and this characteristic is easily discernable and present when viewed from any number and countless vantage points within the area. See Photographs #1-7. The appearance of naturalness is demonstrated to those who visit this unit and undisputedly when observed along one of the many canyon rims or deep within a canyon system that dominate the landscape. Natural processes, rather than the work of man, continue to be the dominant force in the area, thereby maintaining the Coyote Wash wilderness character unit's outstanding natural character.

To emphasize, the wilderness character unit boundaries of Coyote Wash in this submission is significantly different than the areas BLM assessed in 1979, 2007, and in 2013. These differences result from recent boundary adjustments that exclude many noticeable impact areas along the periphery of the landscape’s northern, western and southern areas. These adjustments include significant boundary modifications and a few cherry-stemmed routes from the lands BLM has reviewed for a wilderness resource in the past three reviews. Further, for the lands within Coyote Wash wilderness character unit,

many of the significant human features noted by BLM in the three reviews are now outside the proposed boundaries and do not detract from the naturalness the unit retains.

We would recommend the following steps to the Moab BLM in assessing the natural appearance and naturalness of this landscape and the area submitted here today as the Coyote Wash wilderness character unit.

First, confirm the recent wilderness character review that was performed by the Tres Rios BLM on the Lower Dolores Canyon LWC. Acknowledge that the Lower Dolores Canyon LWC was identified to the Colorado/Utah state line. (Note: the Uncompahgre field office has yet to assess potential wilderness characteristics north of the Tres Rios field office boundary)

Next, evaluate the area directly west of the state line and acknowledge that wilderness characteristics and naturalness does not arbitrarily end at the state line, but indeed continues into Moab BLM managed lands. Continue moving west and up Coyote Wash until a human feature is encountered that will need to be assessed on its impact on the overall naturalness of the area in question. Our evaluation indicates that this may be the past vehicle route feature labeled as “A” on the submitted map (“Coyote Wash Wilderness Character Unit Boundary Map and Route Feature Labeled ‘A’”) at Attachment C. This feature does not detract from the naturalness of the area. Our evaluation of this feature included a site visit whereby we traversed the entire path and also observed the feature from different vantage points. The photographs taken during this on-site field inventory, demonstrate that it is a minor human feature, not a significant impact on the naturalness of the immediate area or surrounding landscape. See Photographs # 1, 6 and 19-25. This way clearly does not detract from the roadless

character of this area as defined in Manual 6310 since it has been improved or maintained by mechanical means. It is not discernable or substantially noticeable from countless locations surrounding the immediate area, nor from other locations, whether up on rims to the west or deep within one of the many canyons. It is not a feature that detracts from the roadlessness or naturalness of the area. These photographs demonstrate that this feature, although potentially visible from aerial photographs, is not as significant when viewed from the ground. Moab BLM must perform its own evaluation of this feature, taking into account the significant new information provided here and with a highly recommended site visit opposed to the past desk exercise evaluations.

Next, if BLM concludes, as we did, that this single route feature “A” is not a significant impact individually or in context of the overall extensive landscape, continue moving west and up Coyote Wash with a naturalness identification. However, if the BLM were to identify this reclaiming, seldom-used way as significant feature detracting from the naturalness of the area, it should utilize this feature as the westernmost boundary of the contiguous Lower Dolores Canyon LWC and then evaluate the remaining lands west of the way in this submission as a stand-alone Coyote Wash wilderness character unit.

The landscape west of route feature “A” is the canyon system’s central core of the Coyote Wash wilderness character unit. See Photographs #1-6. It is large and expansive, free of any significant human impacts. The human features that are present on the rims are not extensively visible, nor are they significant in character to justify that the landscape lacks naturalness. Evaluate the naturalness of each of the side canyons, including Snyder Water Canyon, Lisbon Canyon, Bullhorn Canyon, East Coyote Wash,

Spring Canyon, and Horsethief Canyon. Importantly, there is no human feature, significant or not, that would affect the naturalness of each canyon confluence or up into to these natural canyons. Continue up each respective natural canyon and include in the naturalness identification all natural lands.

Next, begin evaluating the mesa tops or rims of each canyon system. While this is where several human impacts are present, caution should be used in assessing the effect of relatively minor human impacts on the naturalness. See Photographs #9-18 and 35-39 for several typical past human activities and how they appear relatively minor today.

Affected Primarily by Forces of Nature

When this area is experienced by the average visitor, the overwhelming impression is that nature itself has been the sole architect at work in the Coyote Wash. See Photographs #1-7. The rich and varied topography that is present within the Coyote Wash wilderness character unit, one that is blanketed by dense pinyon and juniper vegetation, clearly displays the evolution of natural processes unadulterated by significant human intervention. Expansive views of distant, largely untrammeled landscapes further enhance the impression of naturalness within the unit. Detailed in greater context below, the Coyote Wash wilderness character unit has had all significant human intrusions excluded from the unit through variation and boundary adjustments or by a few cherry-stems. The few remaining human intrusions, primarily the old and infrequently-used vehicle routes, are now faded to an insignificant degree, and are today substantially unnoticeable in the unit as a whole. See Photographs #9-39. Taken singularly or together, these few faint human features do not impact the area's naturalness

and impression that the wilderness character unit remains natural. The region's rugged topography and thick vegetation adequately screens these few faint reclaiming human imprints from view within the immediate area and throughout the unit. See Photographs #1-7. Whether the landscape is viewed from a canyon bottom or ridgeline, only the forces of nature shape the views.

Human Impacts

While many areas outside today's Coyote Wash wilderness character unit boundary display numerous human impacts and features, the lands that remain inside the current area lack any significant impacts that would detract from a naturalness appearance. Further and a result of these significant boundary adjustments, many of the human impacts that BLM relied on to exclude the entire area from being identified for wilderness values are no longer included within the inventory unit. This new adjusted wilderness character unit boundary differs substantially from the information in the previous BLM reviews.

As mentioned above, all significant impacts that remain or are present today have been either excluded by the boundaries and/or cherry-stemmed features. The use of the current unit boundaries, exclude many BLM lands that were part of the BLM's late 1970's, 2007, and 2013 reviews and any significant impacts within these areas are not part of the lands within the current Coyote Wash wilderness character unit. We conclude that BLM should review this new information and move forward on assessing this area as presented within this wilderness character submission.

Below, we will provide substantially new information on BLM's 2007 and 2013 analysis of the Coyote Wash wilderness character unit and where either the situation

significantly differs or where we have information that is not supported by BLM's record. We will also thoroughly document and describe the few remaining faint and insignificant features that remain within the unit boundaries and how these have a minimal impact on the overall impression of naturalness.

BLM's 2007 Wilderness Character Review

BLM 2007 Comment: In the case of Coyote Wash, the proposed area does not adjoin any other area evaluated as possessing wilderness characteristics. As such, it must possess such characteristics on its own.

SUWA Comment Today: The Coyote Wash wilderness character unit, as submitted here runs along the Colorado/Utah state line and is therefore contiguous to BLM lands managed by Colorado BLM. This was the situation in 2007 when BLM performed its review and should have been acknowledged. Today, the Colorado BLM has identified wilderness values up to the state line and this area is included within the Lower Dolores Canyon LWC. Today, this represents significant new information in which BLM must assess the Coyote Wash wilderness character in connection and as being contiguous to identified BLM wilderness character lands.

BLM 2007 Comment: Coyote Wash includes lands that have been heavily impacted by past mining activities, especially during the uranium boom of the past century. The area is riddled with substantially noticeable mining routes, mining-associated disturbances, and seismic exploration lines.

SUWA Comment Today: While we acknowledge that there are many human features that surround the Coyote Wash wilderness character today, significant boundary adjustments

exclude all significant impacts from the unit boundaries. BLM fails to provide any physical documentation, field maps, inventory photographs or other evidence in the records on the location of these substantial impacts. Therefore, we can only provide new information on the known features that remain within the unit today and how each of these are not substantially noticeable impacts on the unit as a whole.

BLM 2007 Comment: The San Juan County road inventory, verified by BLM, indicates approximately 76 miles of interior routes on public lands within the proposal.

SUWA Comment Today: The San Juan County road inventory alone does not represent any information on the condition of the route in question, its impact to the naturalness, or whether these routes have succumb the forces of nature. BLM provides no evidence that the mere fact that San Juan County has an inventory record of the route that it constitutes a significant impact. Further, the Coyote Wash wilderness character unit as submitted here excludes many of the miles noted by BLM in 2007 and this represents a substantially different situation than when BLM reviewed the area in 2007. In addition, we have provided multiple photographs that demonstrate the condition of many of the routes San Juan County includes within their inventory. See Photographs #9-36.

BLM 2007 Comment: Aerial photographs from 2006 indicate many more miles of constructed routes above and beyond the County inventory:

SUWA Comment Today: Aerial photographs are a useful tool and a good first step in assessing an area for the potential wilderness characteristics, it should not be the only step undertaken by the BLM when inventorying an area for potential wilderness values.

This step can indicate where to begin an inventory, but it does not represent the current condition of the feature on the ground, whether it has reclaimed to a substantially unnoticeable impact or how this impact appears in relation to the overall inventory area. Regardless, SUWA recently reviewed all aerial photographs of the area as well. This was not a singular exercise, but was done in conjunction with our on the ground inventory files and photographs of each of these features. Many impacts that appear on aerial photographs are not indicative of their character when viewed from the ground. SUWA also have performed significant boundary adjustments to the unit area and now includes BLM lands that are dramatically different than the area BLM reviewed in 2007. Without any BLM record indicating where each of these features were located during the 2007 review, it's difficult to provide site specific information.

BLM 2007 Comment: As shown in the aerial photos, the areas encompassed in photos 1 and 2 show numerous impacts. Only a portion of the area encompassed by photo 3 appears natural, but this area is of insufficient size to manage as a stand-alone unit.

SUWA Comment Today: This small documented sampling of the entire inventory area and is insufficient to determine whether wilderness characteristics are present. Further, if BLM would have assessed the landscape between each of the three aerial photographs closer, they may have determined that there is no single significant feature that physically separates or impacts each of the aerial photographs from being contiguous from one another. Further, several photographs are included at Attachment B that view into the areas of each of these BLM aerial photograph areas that demonstrate that large areas retain natural values. See Photographs #1-6.

BLM's 2013 Wilderness Character Review Staff Report

BLM's Comment: On August 2, 2012, BLM personnel visited the parcels potentially being offered for lease in the February 2013 proposed sale. Rock Smith (FO Manager) and Katie Stevens (Outdoor Recreation Planner) reported to me that the parcels in question were bisected by existing roads, and were not in a condition likely to possess wilderness characteristics.

SUWA's Comment: It is unclear exactly where BLM staff visited and whether BLM staff were reviewing the proposed lease parcels or performing a detailed on the ground wilderness character review. No evidence is provided to confirm any wilderness review was performed, whether on the routes traveled or for the entire Coyote Wash area. In fact, given that the latest wilderness report was prepared after the BLM's decision to offer parcels for lease inside of the Coyote Wash area, this review concerning Coyote Wash's potential wilderness characteristics was created after the fact. Further, just because some parcels were bisected by "roads" does not preclude the central core area of Coyote Wash and its multiple side canyons from possessing wilderness characteristics. As detailed in this submission, multiple boundary adjustments have been made to exclude much of the areas along the north, west and south that appear to have some significant impacts or where a number of smaller old seismic lines are present. This adjustment has excluded impacted areas while identifying a large substantial area that retains an overwhelming natural appearance. Photographs accompany this submission that further details the natural characteristics of the lands in question. See Photographs #1-7. BLM to date has yet to produce a single photograph or any field inventory map outside the

initial office exercises to highlight field review work performed within the Coyote Wash wilderness character area.

BLM' Comment: Prior to field trips, parcels that overlapped citizens' proposed wilderness in the Big Triangle and Coyote Wash areas were identified.

SUWA's Comment: This cursory exercise does not provide any analysis of the potential wilderness characteristics of each area. It could help BLM identify where a public citizen group advocating for the identification of wilderness characteristics may be located within the field office, but it does not account for a wilderness character review. In addition, BLM has not provided any of this purported step and field review packets to justify a thorough wilderness review has ever been performed in the field.

BLM's Comment: In addition to the field reviews undertaken by the multiple disciplinary ID team...

SUWA's Comments: In as much as BLM is suggesting that staff performed several wilderness character reviews of the Coyote Wash area, to date, no evidence in the record supports this purported review. If BLM staff, did visit the area and did perform an on-the-ground wilderness character review it should have analyzed whether the entire area has wilderness characteristics whether portions of the area may have wilderness values and then included that information in a record available for public review. With a no wilderness character determination, it appears that the wilderness review failed to perform any documented inventory in the central portion of Coyote Wash and its many side drainages.

BLM's Comment: I personally performed an exhaustive review of 2011 GIS-incorporated aerial photos of the area in question, and observed a large number of roads and other impacts, including an operating copper mill tailing pond.

SUWA's Comment: While performing a detailed review of aerial photographs can help BLM in identifying potential impacts and areas free of impacts, BLM should not exclusively rely on this step. It is a cursory office exercise that should then be taken into the field to determine the character of the impact on the ground. As BLM knows, features visible on aerial photographs appear more significant than when observed on the ground. Many times these features appear on aerials because of contrast with existing vegetation; however, when observed directly on the features could be weathered and reclaimed with erosion and vegetation regrowth. Further, the determination of wilderness characteristics is to the average visitor as experienced on the ground and within the area, not to the average aerial photograph tour. As SUWA's photographs demonstrate, this was the case here; features that may stand out in aerial photographs are clearly not as substantial when viewed on the ground and do not detract from the naturalness of the area. See Photographs #9-39.

BLM's overly exclusive use of the aerial photographs for the Coyote Wash area does not constitute a wilderness review and is not an accurate representation of on-the-ground conditions.

Regarding the "operating copper mill tailing pond", this feature is located along the periphery of the area and as operations have continued of the past few years the impact has expanded. Our detailed review acknowledges this feature and extensive boundary adjustments have excluded this feature as well as many others in this

immediate area. This feature and many other BLM noted impacts are no longer within the area that retains wilderness values and therefore BLM should not continue to assess this feature has an impact on the lands to the east and deep within the canyon systems. Further, the fact that this tailing pond or other routes exist outside the boundaries should not diminish the naturalness of multiple locations isolated by topography and vegetation.

Naturalness Conclusion

The Coyote Wash wilderness character unit, as submitted and detailed above, does not contain significant impacts that would detract or diminish the inherent naturalness that is clearly present when visited on the ground. The landscape within the unit boundaries are not impacted nor diminished by the unit's boundaries or cherry-stemmed areas, thus, BLM must discontinue analyzing such routes or features as "significant impacts" to the area's naturalness. Within these recently submitted wilderness character boundaries remains a large, rugged and natural landscape. This natural appearance is overwhelming and would be easily discernable to the average visitor whether viewing the Coyote Wash wilderness character unit from a boundary route, on a short walk along the many rims, or hiking and exploring more extensively to more remote vantage points, prominent rocky outcrops or deep within the multiple canyon systems. The landscape (See the attached maps and Photographs #1-7), of abundant pinion juniper and rugged terrain retains its essential natural qualities.

In summary, SUWA has provided the BLM with significant new information, through photographs and analysis, regarding the Coyote Wash wilderness character unit's present natural character and wilderness resource. All human features that remain significant today have been excluded from the wilderness character unit, while the few

insignificant features that do not detract from the naturalness of the unit have been properly included within unit boundaries. Colorado BLM has identified wilderness characteristics to the Colorado/Utah state line and Utah BLM has yet to evaluate the contiguous lands in conjunction with this new information. The single route that runs north to south (Labeled as “A” in Attachment C) has yet to be evaluated on the ground by BLM as well. The naturalness and the impression of naturalness is overwhelmingly present and SUWA’s assessment of the area was properly assessed and inventoried in the area, on the ground and away from a vehicle and was not conducted as an office or paper exercise. SUWA continues to conclude that wilderness characteristics and a remarkable wilderness resource are present in Coyote Wash region.

c. Outstanding Opportunities for Solitude or Primitive Recreation

The Wilderness Act of 1964 Section 2(c)(2) states that an area must “have outstanding opportunities for solitude or a primitive and unconfined type of recreation.”

Outstanding Opportunities for Solitude

Because the Coyote Wash wilderness character area receives relatively few visitors, it holds major appeal to visitors seeking exceptional solitude. The likelihood of encountering another individual within the unit is extremely low. Several attached photographs demonstrate that visitors to the Coyote Wash wilderness character unit can easily achieve an outstanding experience of solitude somewhere within the unit boundaries: along one of the area’s multiple forested or rocky ridgelines, deep within an isolated canyon bottom or within the many isolated and hidden rock outcrops. See Photographs #1-7. This outstanding potential for solitude is maintained throughout the unit by its diverse and rugged topography, thick vegetative screening provided by

pinyon-juniper forests in much of the area, and its overall remoteness. SUWA, during field inventories, located countless secluded areas and ample screening that further enhance the unit's outstanding solitude opportunities and is demonstrated in several of the attached photographs.

Besides the vegetation screening and topographic relief that affords many opportunities for solitude, the expansive vistas and views of countless distant ranges adds to the sense of isolation. The visitor to the Coyote Wash wilderness character unit is dwarfed within the context of the immediate landscape and surrounding vastness. This exceptional solitude is maintained throughout the area with little interference by other factors. See Photographs #1-7.

Outstanding Opportunities for Primitive Recreation

Like the assessment of the outstanding solitude, the ability for a visitor to engage in outstanding primitive recreational activity within the unit is readily available. SUWA's exploration of the area identified multiple hikes along the area's ridges and rims easily provided the outstanding primitive recreational activity required by the Wilderness Act. See Photographs #1-7. Visitors who enter the central core of the area and explore one of the many side canyons engage in a primitive recreational activity by just the mere fact of wandering through this rugged landscape. These hikes reveal the sense of isolation and enhanced the primitive experience one can easily achieve somewhere within the unit boundaries. On the scientific studies potential, geologists or amateur geologists will find the Coyote Wash wilderness character unit also affords interesting geology for a primitive scientific outing. Our evaluations further concluded and indicated that

opportunities exist for hunting, sight-seeing, backpacking, camping, photography, as well as other primitive type recreational activities in the Coyote Wash area.

To summarize, Moab BLM has yet to fully assess the potential for visitors to find and achieve an outstanding solitude or primitive type recreational experience within the area, notably the main canyon system of Coyote Wash, its side canyons or along one of the multiple ridges and rims. It's important to acknowledge that not every acre needs to provide an outstanding solitude or primitive recreational experience. BLM's 1979 inventory files (UT-060-140) noted that there is no opportunity for potential primitive recreation in the unit due to its configuration. Today, our knowledge of primitive recreation activities is not limited to an areas configuration alone, but whether there are indeed locations for outstanding opportunities for solitude or primitive activities due to multiple other influences. The Coyote Wash wilderness character unit is remote and seldom visited, with its landscape easily lending itself to countless locations that influence outstanding solitude and primitive activities. The topography and vegetation of this area is abundant and rugged, dramatically enhancing these wilderness characteristics. Therefore, the lands provided as the Coyote Wash wilderness character unit are not devoid of these or potential outstanding primitive recreational opportunities. Visitors can easily achieve an outstanding solitude and primitive recreation experience. With this information, and the fact BLM lacks any current inventory information, the agency must utilize this wilderness character submission to evaluate, inventory and identify the resource of wilderness that has not been accurately inventoried. This assessment must be from an on-the-ground field survey that assesses the area on its own character, opposed to the all too common working office meeting that excludes actual field work.

d. Supplemental Values

According to the Wilderness Act, an area “may also contain” supplemental values. Thus, the BLM shall determine if a unit contains “. . . ecological, geological, or other features of scientific, educational, scenic or historical value.” Although such values are not required for wilderness designation, their presence, if any, should be documented. The Coyote Wash wilderness character unit contains several supplemental values that may have not been documented in the past BLM wilderness character inventories. First, as the attached photographs illustrate, this area holds scenic values. Views from the uplands are expansive and include vistas of the La Sal Mountains and into Colorado to the San Juan Mountains. The unit also contains ecological values in its critical, high-value, and substantial habitat for several sensitive species: Burrowing owl, Lewis’ woodpecker, peregrine falcon, sage grouse, bald eagle, willow flycatcher, Western red bat, ringtail cat, spotted ground squirrel, Virgin River montane vole, dwarf shrew, fringed myotis, Townsend’s big-eared bat, black-footed ferret, Great Plains rat snake, many-lined skink, Utah milk snake, and mule deer. This information is derived from the Utah GAP Analysis data and Utah DWR Mammal Habitat Coverage data.

Investigations of the area’s archaeological resources did not reveal anything substantive, but our inventory of the unit was not exhaustive in this regard, therefore the potential for this resource still may exist.

C. Photographic documentation

The photographs and descriptions in Attachment B and C provided the BLM with extensive new photographic documentation. To date, BLM’s past three wilderness character reviews have not produced a single on-the-ground photograph, only aerial

photographs have been utilized. This photographic evidence demonstrates the unit's wilderness characteristics including its naturalness and opportunities for an outstanding solitude or primitive recreation activity somewhere within the unit. Further, many photographs demonstrate that several of the human features that remain inside the Coyote Wash wilderness character boundaries, as presented today, are not significant impacts and have succumbed to aging or are becoming dramatically less evident on the immediate landscape. See Photographs #9-39. This photographic information presents the BLM with significant new information regarding the wilderness resource of the Coyote Wash wilderness character unit and represents the most detailed information ever received to date by the BLM either internal or external.

CONCLUSION

While BLM's past three wilderness character evaluations have yet to identify the presence of the wilderness resource in the Coyote Wash area, there is such a resources in this region. This submission, constituting significant new information, contains information demonstrating the presence of these wilderness characteristics. From the fact that SUWA has performed an extensive on-the-ground inventory and submitted photographs and detailed information, to the new information from the Tres Rios BLM field office that has identified wilderness characteristics up to the Colorado/Utah state line, to SUWA's recent wilderness character evaluation and inventory, we conclude that there remains a large core of the Coyote Wash area that retains an undocumented wilderness resource. See Photographs #1-7. We contend that the Coyote Wash wilderness character unit, as presented here, has never been evaluated, inventoried, or accurately assessed with regards to the present wilderness characteristics. This wilderness

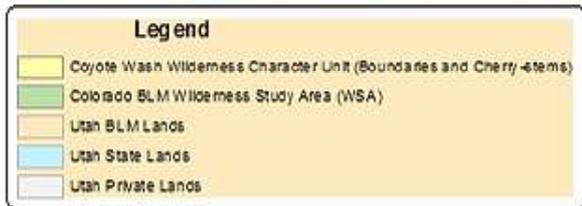
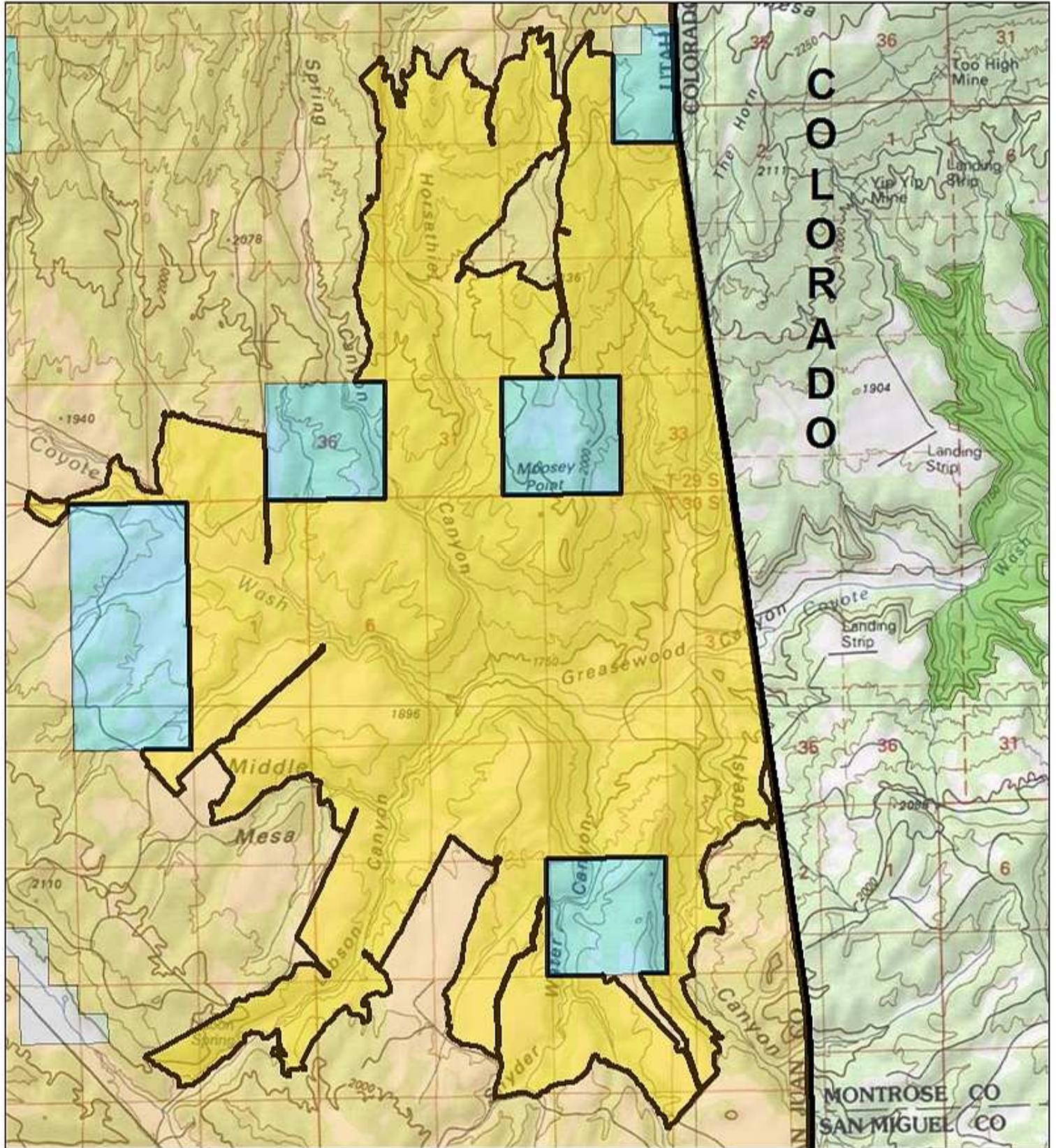
character submission reflects the most up-to-date and detailed information concerning the wilderness characteristics identified as the Coyote Wash wilderness character unit. This new information and the wilderness characteristics have never been verified in any BLM assessments or documents, either in the late 1970's wilderness inventory evaluations, the current resource management plan, or within the latest cursory 2013 evaluation.

Therefore, this wilderness character submission, one that represents significant new information on an undocumented resource obliges the BLM to review this area.

As documented throughout this submission, SUWA's new information identifies through photographs and analysis, the unit's "naturalness," "outstanding opportunities for solitude and a primitive type of recreation," as well as several "supplemental values" for the Coyote Wash wilderness character unit, as required by the 1964 Wilderness Act. We note that in order to properly assess the unit's wilderness characteristics, the BLM must conduct an on-the-ground field inventory. A cursory review, such as those recently performed by the field office's review for the resource management plan and again in 2013, is not an acceptable "inventory," but rather the first step in assessing an area's potential wilderness characteristics. Therefore, this type, or any other "inventory" method, such as an aerial photograph interpretation, is inadequate and likely misleading. Further, we request the opportunity to visit the lands within the Coyote Wash wilderness character unit, as presented here with the agency to help assist in interpreting and evaluating the information we have provided.

ATTACHMENT A

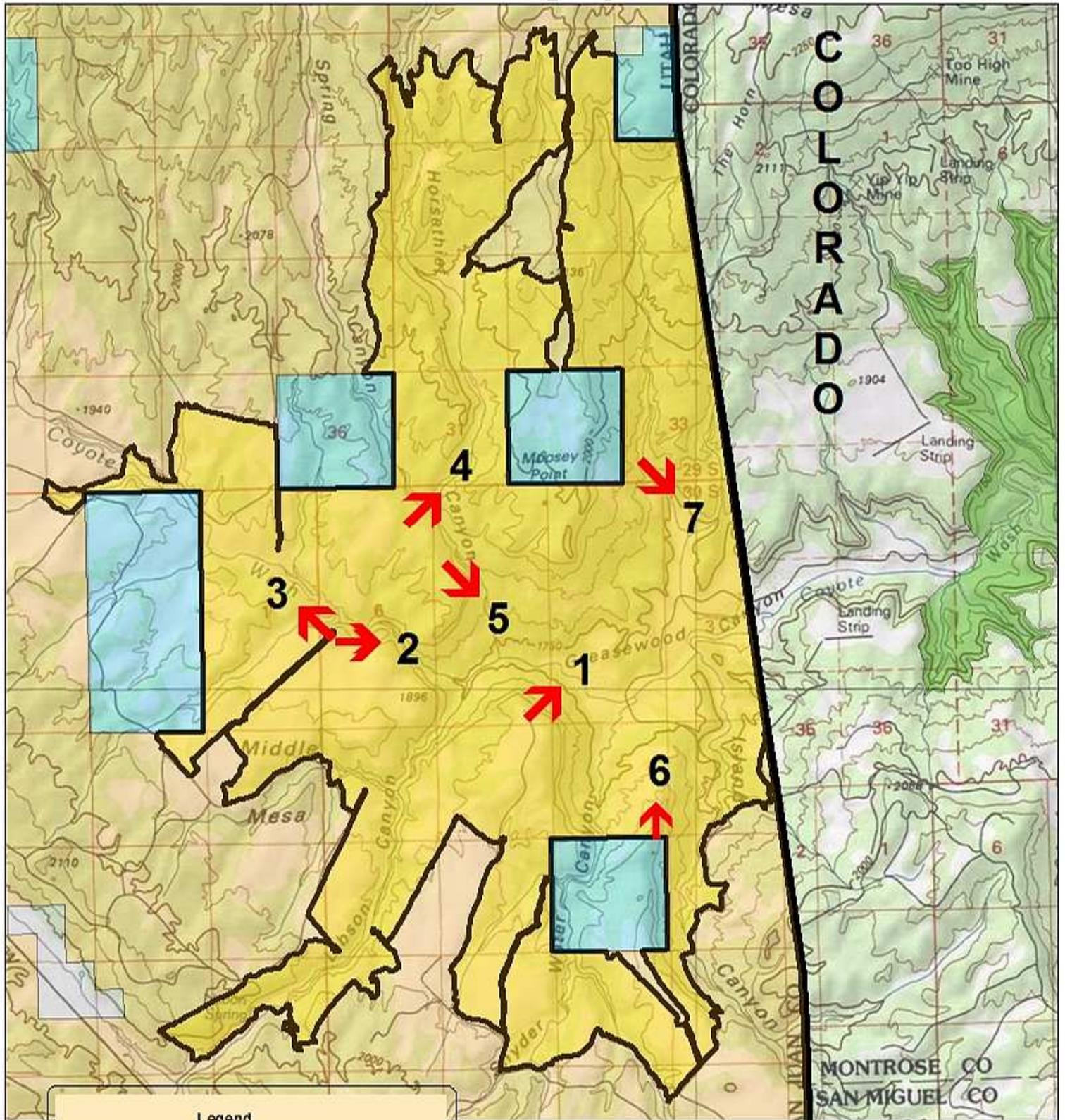
Coyote Wash Wilderness Character Unit Boundary Map



Submitted by the
Southern Utah Wilderness Alliance
February 15th, 2013

ATTACHMENT B

Coyote Wash Wilderness Character Unit Boundary Map and Scenic Photograph Locations



Legend

- Coyote Wash Wilderness Character Unit (Boundaries and Cherry stems)
- Colorado BLM Wilderness Study Area (WSA)
- Utah BLM Lands
- Utah State Lands
- Utah Private Lands
- Photograph Location and Number

**Submitted by the
Southern Utah Wilderness Alliance
February 15th, 2013**

Coyote Wash Wilderness Character Unit Photographic Documentation



Photograph #1 – Taken high along the rims of Coyote Wash, this photograph demonstrates the extensive naturalness of the landscape within the central core canyon system. It highlights the natural character of the topography and vegetation associated with the area, and landscape devoid of any significant impacts that would detract from an average visitor’s impression. Importantly, this photograph also displays the north-south running route (Labeled as “A” at Attachment C) that runs along the Colorado/Utah state line. It is not discernable nor does it demonstrate a significant impact on the landscape that would physically separate the identified Lower Dolores Canyon LWC from the entire Coyote Wash wilderness character unit.



Photograph #2 – The landscape within the Coyote Wash wilderness character area contains many rugged and natural side drainages that drain into Coyote Wash and eventually into Colorado. Each of these natural side canyon systems are free of any significant human impacts that physically separate one from another when determining whether wilderness characteristics exist. BLM’s three aerial photographs analysis is not a valid wilderness character review procedure (see Attachment D) because it does not evaluate the lands between each aerial photograph where there are no significant impacts, among other problems. Visitors are afforded many remote lands that provide experiences with exceptional and outstanding solitude, heightened by the topography and natural environment as seen here.



Photograph #3 – Looking up Coyote Wash and towards the snow-capped La Sal Mountains, the canyons demonstrate an impression of naturalness. The benches and canyon bottom all contain extensive natural vegetation associated without the influence of man or the impression that significant impacts mar the lands. This particular vast vista point provides visitors with isolation and dramatic openness within the large and natural landscape which overwhelmingly enhances the opportunities for an outstanding solitude experience somewhere within the unit.



Photograph #4 – BLM's past two assessments of the naturalness of this area does not rely on either ground inventories or evaluations within the boundaries of the unit. Here, as clearly demonstrated, the canyon system of Horsethief Canyon remains void of any visible significant impact and if visited would make an impression of naturalness. Boundaries exclude many human features that BLM has noted and areas remain where extensive natural values continue. In addition, an average visitor who enters from this point or countless other locations would have an easily afforded primitive recreational hiking opportunity.



Photograph #5 – Looking down into the heart and core area of the Coyote Wash wilderness character unit, it clearly demonstrates a rugged topography with vast covered forested areas with dramatic vistas to the San Juan Mountains of Colorado. No single significant impact is visible viewed from this particular location or one of the multitude of other natural locations. Further, the vast Coyote Wash canyon system does not appear to be so severely impacted that nowhere has a naturalness appearance or characteristic. BLM's aerial evaluations (this photograph looks into BLM's AP3 at Attachment D) do not contain enough information to determine this impression to the average visitor.



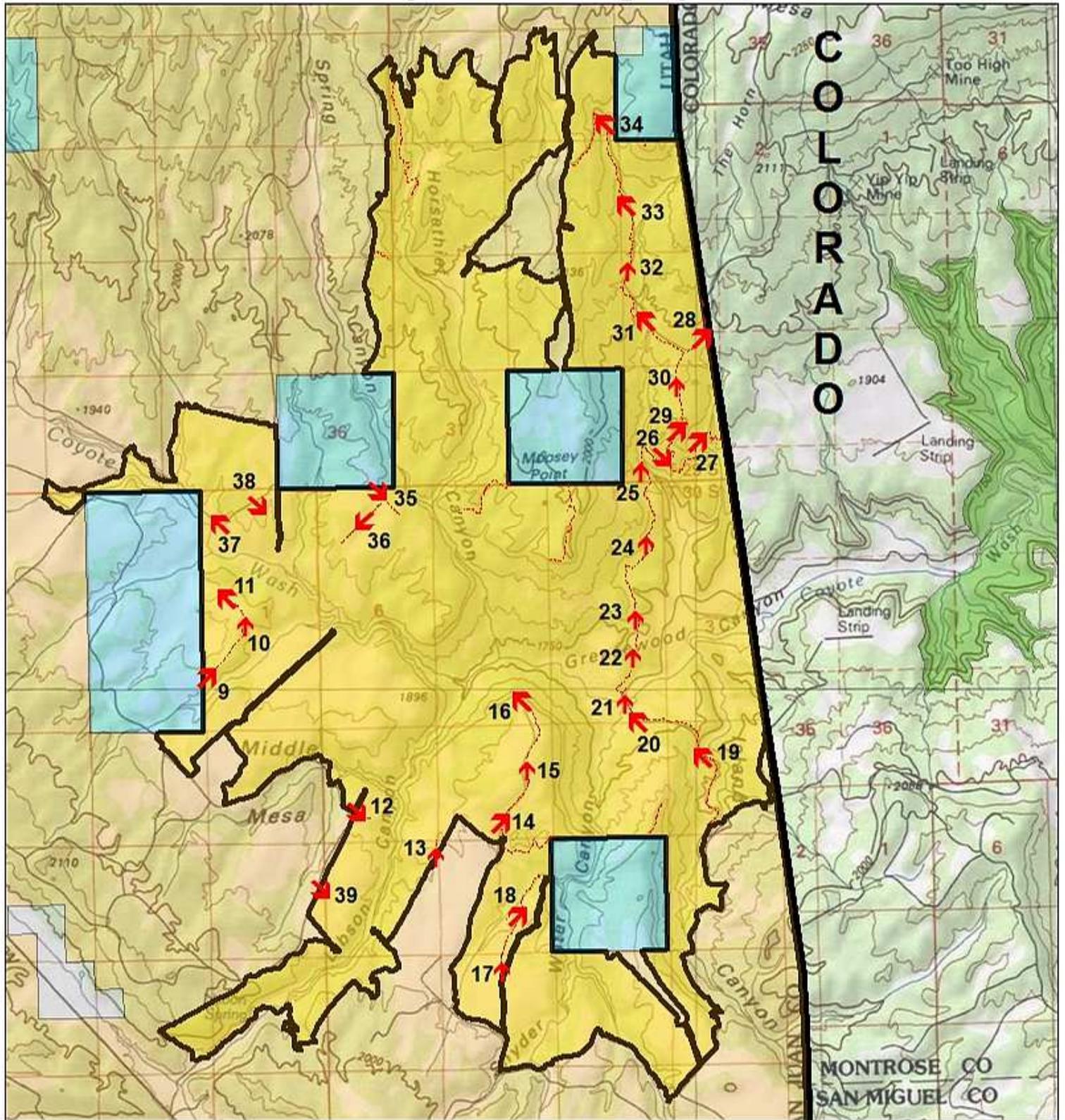
Photograph #6 – Another exceptional vista point overlook the central core area of Coyote Wash wilderness character unit with views into Colorado as well. The expansive rugged canyon area all without the significant influence of man. BLM's inventory records are incomplete to accurately reflect that any on the ground wilderness character inventories were ever completed. If BLM visited this particular location, natural values and character are easily seen and experienced. The reliance on impacts seen in aerial photos fails to account for the vastness and scenic naturalness that exists. Without question, there is a wilderness resource present within the area, one that is contiguous to Colorado and Colorado BLM's recent wilderness character determination. These wilderness values do not arbitrarily end at the state line, but unequivocally continue up into the upper drainages of Coyote Wash.



Photograph #7 – The presence of outstanding solitude and an opportunity for a primitive recreational activity within the Coyote Wash area is easily achieved. As seen here, a visitor can either wander along the natural rugged and rocky rim of this side canyon, or hike down deep within the canyon. Either choice, or the countless other opportunities within the unit, unquestionably affords the either an outstanding solitude experience or a primitive type recreational activity. With regards the naturalness evaluation, Moab BLM continues to rely on only a simple and cursory office exercise of performing an aerial evaluation. BLM has noted that this was exhaustive, it continues overlook the resource of wilderness that is clearly present. Moab BLM's reliance solely on aerial photograph does not constitute an accurate wilderness review. BLM's recent evaluation of the proposed leases was not a wilderness character review as no information is provided in the record to validate any wilderness character determination of the area.

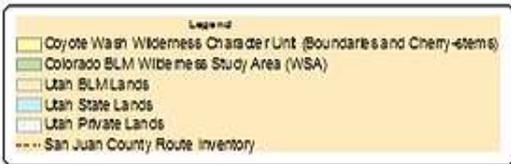
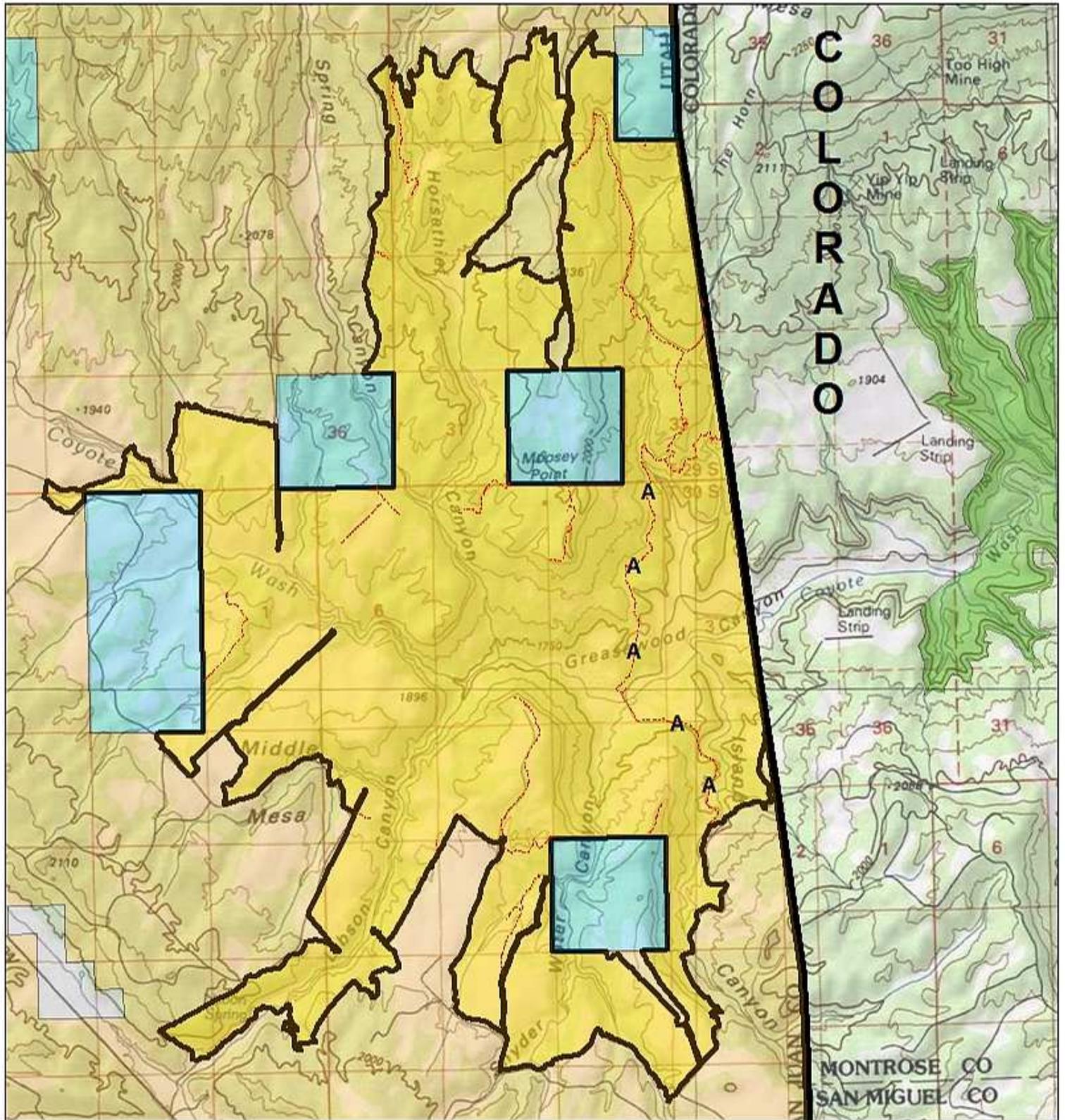
ATTACHMENT C

Coyote Wash Wilderness Character Unit Boundary Map and Human Impact Photograph Locations



Submitted by the
Southern Utah Wilderness Alliance
 February 15th, 2013

Coyote Wash Wilderness Character Unit Boundary Map and Route Feature Labeled "A"



Submitted by the
Southern Utah Wilderness Alliance
 February 15th, 2013

Coyote Wash Wilderness Character Unit Human Feature Photographic Documentation



Photograph #9 - Proceeding into the extreme western edge of the Coyote Wash wilderness character area, this feature does not significantly impact the immediate area or substantially affect the naturalness of overall large unit as a whole. It is not a maintained route and receives only occasional vehicle use, lending to its fading and reclaiming condition. Under Manual 6310 it is not considered a "road." When reviewed directly on this feature or from countless other locations, whether within the nearby canyon systems or from a rim to the east, it does not appear to be substantially noticeable. It has been included in the unit as a faint primitive way and should not preclude the larger core area as being identified as retaining wilderness characteristics.



Photograph #10 - Further along the same route as the previous photograph, this feature displays less use and more vegetation reclamation within the track. Its unmaintained character and lack of extensive use continues to lessen its impact and character on the naturalness of the unit and immediate area. Singularly, or taken in context of the entire Coyote Wash unit, it does not constitute a significant impact on the naturalness of the area.



Photograph #11 - Taken near the end of the route, vegetation growth in the track is extensive. Its location is isolated in the western portion of the unit and has minimal impact on the natural character of the area and unit as a whole. It does not significantly impact the naturalness of the area and this is enhanced by some of the area's topographic relief and screening as seen and demonstrated in this inventory photograph.



Photograph #12 - This short linear feature is part of the route inventory BLM received from San Juan County. The fact that it appears on this inventory does not account for its physical character or its impact on the naturalness of an area. As seen here, it is located along a sage brush bench, but when viewed and assessed on the ground its character is quite different than that as observed from aerial photographs or as a line on a map. Today, it appears to receive little to no vehicle use and has been reclaiming over the past many years. This fact has lessened its impact on the naturalness of the immediate area and unit as a whole. It is not a significant impact and is located within the boundaries of the Coyote Wash wilderness character unit.



Photograph #13 - Another small and isolated feature that appears on San Juan County's inventory. Its character is minimal on the landscape and is reclaiming due to the natural erosion process. It is not visible from the nearby rim of Lisbon Canyon to the west. Its substantially unnoticeable presence does not impact the naturalness of the unit and BLM should perform its own wilderness character inventory on the ground.



Photograph #14 - This route, proceeding past a stock pond receives very little use and is no longer a maintained route. It is located here within an abundant forested covered area which enhances the vegetation screening of this feature. It would show up on aerial photographs, but this evaluation alone does not correctly assess this feature's impact to the surrounding landscape's natural values.



Photograph #15 - Further to the north of the last photograph, the route appears to receive less use. While grazing appears to continue to impact the vegetation, lack of maintenance and the reclamation process continues to lessen its impact on the area and naturalness of the overall landscape. Today, it would be a primitive route and should not be evaluated as a significant impact on the natural values of the Coyote Wash wilderness character area. Its impact on the bench between Lisbon Canyon, Snyder Water Canyon and Coyote Wash is minimal when taken in context of the landscape and its topographic relief.



Photograph #16 - No permanent feature was located at the end of this fading route. It displays signs of succumbing to natural erosion and vegetation regrowth as it receives very little use. When inventoried on the ground (rather than in the office using aerial photography) its impact on the naturalness is minimal and it is located in an area with significant vegetation screening which enhances its unnoticeable character to an average visitor to the area.



Photograph #17 - Taken at the junction of two routes, the right one is an excluded cherry-stem with the left route being an even-less-evident and seldom used route. It is located along a sage brush bench and is only visible when one stands immediately on the track, from the nearby benches or from a vantage point to the east or west it is invisible. It does not significantly impact the immediate area. Vegetation regrowth continues and each season of rain and snow lessens its impact on the naturalness of the area.



Photograph #18 – Naturally rehabbing due to the lack of vehicle activity and vegetation regrowth, this past human impact is no longer a significant impact on the area's naturalness. Part of San Juan County's route inventory, its presence on this inventory does not automatically affect the natural values of the unit, but an on the ground evaluation should be performed prior to BLM automatically discrediting that any wilderness resource due to its existence.



Photograph #19 – The following several photographs detail the condition of the only route that crosses north to south through Coyote Wash itself. (Labeled as “A” at Attachment C). This route must be analyzed by the Moab BLM in conjunction to new information provided by SUWA, here, and due to the recent Colorado BLM’s wilderness character determination to the Colorado/Utah State line. Its current condition does not indicate that it is a significant impact that would for any unit boundary nor would it lead to an overall determination that no part of the Coyote Wash wilderness character unit, as submitted here lands the naturalness required to be identified as retaining a wilderness resource.



Photograph #20 – While evidence is present of past construction, no recent evidence indicates that the old reclaiming route receives significant vehicle activity or the feature receives continued maintenance. Its character continued to become less evident each time significant rains fall due to erosion as well as new vegetation growth. BLM’s reliance on only an aerial evaluation performed in the office does accurately assess this route’s condition on the ground. (Labeled as “A” at Attachment C)



Photograph #21 – At the Coyote Wash crossing itself, the condition of this past human impact is become less evident and substantially unnoticeable. The Moab BLM’s determination that this is a significant impact is not supported by a site visit. Further, and as demonstrated in Photographs #1 and #6, this minor linear feature across the larger landscape is not so significant to warrant exclusion for the large and expansive surrounding natural landscape. (Labeled as “A” at Attachment C)



Photograph #22 – This route is part of several past mineral exploration routes in the area and the current condition of the route continues to succumb to the natural erosion process. While the use by cows outnumbered the amount of vehicle use, it remains a fading route subject to the shifting sands and vegetation regrowth. It is located and isolated in a landscape of extensive topographic relief and is invisible to the average visitor unless he or she is standing directly on top of the route. The presence of this past human impact is minimal and substantially unnoticeable on the naturalness of the area. (Labeled as “A” at Attachment C)



Photograph #23 – This old and fading route appears on both the 7.5 minute topographic map, as well as San Juan County’s route inventory. These two factors are not evidence of its current condition and is not an accurate assessment to be solely relied upon by the Moab BLM. Without any records to support BLM continued no wilderness determination and that this feature is a significant impact, BLM must rely on the submitted new significant information here. This on-site wilderness character and route assessment found that this route does not constitute a significant impact. It continues to be subject to the forces of nature and as such has and will continue to become substantially less noticeable. (Labeled as “A” at Attachment C)



Photograph #24 – Concerning its presence on the naturalness, it has many factors that render it an insignificant impact on the landscape. First is its reclaiming nature though the natural process of seasonal rains, lack of extensive vehicle use, and natural revegetation of native plants. Second, and an important component to the entire landscape, but here in the immediate area, the location of the feature is well surrounding by topography and vegetation that extensively screens the faint feature. BLM aerial evaluations alone do not perform the warranted site specific evaluation that has been done by SUWA or physical information necessary to evaluate this route properly. (Labeled as “A” at Attachment C)



Photograph #25 – This photograph details the route as it continues up into an even more rugged and rocky landscape within the Coyote Wash wilderness character unit. As before, it is not a significant human impact that would exclude the entire unit from retaining wilderness characteristics. The landscape throughout the area, especially here, demonstrates an exceptional topographic screening of the route which continues to enhance the presence of naturalness. BLM should avoid an overly cramped and inaccurate desk approach to assessing and evaluating the presence of these few features and their overall affect on the naturalness. The best evaluation of these is an on-the-ground visit opposed to an office map exercise or aerial interpretation. (Labeled as “A” at Attachment C)



Photograph #26 - This isolated route is located just west of the Colorado/Utah state line. Vehicle use is largely non-existent here as well as any recent mechanical maintenance which has allowed this old route to begin to erode and reclaim. Screening is relatively extensive here by the rugged and rocky topography and by more extensive vegetation in the northern areas of the unit. Today, this feature has a minimal impact on the naturalness of the unit and should not be considered as significantly impacting the area or detracting from naturalness. Our field inventory indicates that it is a substantially unnoticeable impact.



Photograph #27 - Proceeding through an opening in the landscape this route continues to receive little to no use, partly due to the impassable nature of some of the surrounding routes. It demonstrates vegetation regrowth in this relatively arid region which indicates the lack of maintenance in many years. It will continue to reclaim if not used or maintained and due to its isolated locations and rugged landscape that surrounds it, it does not have a significant impact on the apparent naturalness of the area.



Photograph #28 - Another faint and reclaiming route near the Colorado/Utah state line. This feature is located in an area of topographical screening. Without question it does not detract from the vastness of the remaining Coyote Wash wilderness character unit. This on-the-ground inventory better reflects its impact on the wilderness character of the region (which it does not) than BLM's cursory aerial evaluations. We would expect the BLM to discontinue its aerial only assessment and visit the expansive natural landscape to perform a more thorough inventory.



Photograph #29 - With little to no vehicle use and no maintenance, the route that proceeds north to south within the Coyote Wash wilderness character unit demonstrates a minimal impact. Reclaiming by erosion and only passable by cows, the route is located within a landscape that provides extensive topographical screening. This photograph, taken while in the field, highlights both the substantially unnoticeable character route and the rugged topography that surrounds it.



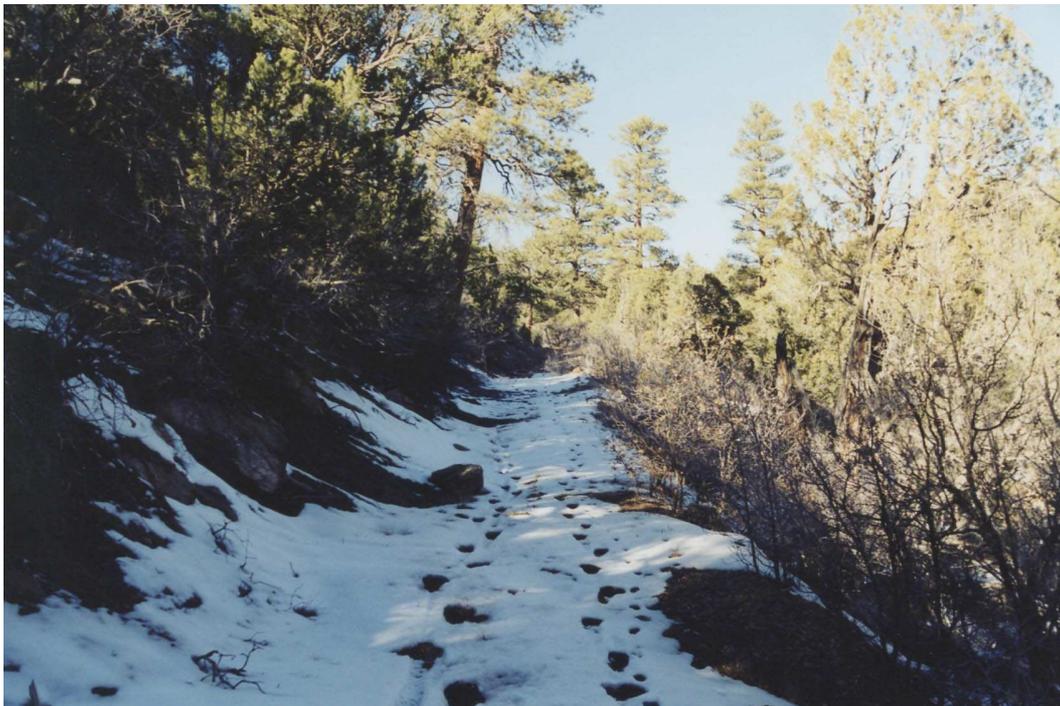
Photograph #30 - An old dugway cut shows evidence of erosion and lack of any mechanical maintenance of decades-old construction. Today, with the northern portions of the route being impassable, it continues to reclaim and has become an insignificant human impact on the naturalness of the areas. It constitutes a primitive route and will be included in the larger Coyote Wash wilderness character unit.



Photograph #31 - As this old route climbs to the north; it continues to show evidence of little vehicle activity and no maintenance. Its immediate location is isolated from the large core area of the Coyote Wash area and has a minimal affect on the natural integrity of the large landscape. It does not constitute a significant impact regardless how it appears on aerial photographs.



Photograph #32 - While performing an on the ground physical inventory of this route, many photographs were taken to document the character of this feature. BLM lacks any on-the-ground wilderness character or route inventories for any of the Coyote Wash wilderness character unit. This photograph provides and documents the physical evidence on the minimal and substantially unnoticeable character of this feature. While it would appear in aerial photographs, this alone does not provide enough information for BLM to determine that there are no locations within this vast landscape that retain wilderness characteristics.



Photograph #33 - While some snow covers the route, it is apparent that natural erosion and lack of maintenance exists on this route. It continues to be located within a rugged canyon area with abundant vegetation screening. Visitors to the interior of the Coyote Wash area would be completely unaware that this reclaiming old route is even present. BLM's continued reliance on aerial photographs does not accurately inventory this route nor does it appear that BLM staff in 2012 did any route inventory along this particular route for the lease sale evaluation.



Photograph #34 - Near the top of Moosey Point the route demonstrates severe erosional rutting creating an impassable or nearly impassable route. Thus, the route to the south receives very little or no vehicle use. BLM's past 2007 and 2013 assessments make no acknowledgement that the main north to south route in the Coyote Wash area has become very eroded and perhaps impassable to vehicle activity. This photograph alone represents significant new information on this location and route in general.



Photograph #35 - Just above Spring Canyon is located two past mineral routes. This one is the main travel route out onto the bench or rim area and displays a lack of significant vehicle activity or maintenance. It further displays significant vegetation regrowth within the track lessening its direct impact on the naturalness of the immediate area. Screening through the topography of the area and vegetation drastically affects the appearance of natural characteristics throughout this northern area. A determination from aerial photography that this feature is significant is not an accurate assessment of conditions as they exist on the ground.



Photograph #36 - While present on aerial photographs and as part of San Juan County's route inventory, no other information in BLM records indicate that an assessment of this route was performed. This field photograph clearly demonstrates and provides BLM with information on the character of this route as it appeared during our field visit. As seen, it displays significant vegetation regrowth along its path and it is located within an extensive forested area. These factors, along with several others, lead to the visual presence of the route being substantially unnoticeable. It does not impact the immediate area significantly nor does it affect the natural integrity of the core canyon systems of Coyote Wash.



Photograph #37 - Located in the extreme Northwest portion of the Coyote Wash area, the route demonstrates its reclaiming and substantially unnoticeable character. It no longer receives significant vehicle use or maintenance and as a result continues to reclaim through the natural process. Whether viewed in the immediate draw or miles to the east, it does not rise to a substantially noticeable impact.



Photograph #38 - This feature appears to be an old seismic line from several decades ago in the area. It proceeds through a bench and sage brush area and demonstrates an extensive amount of reclamation with regrowth of the sage brush directly within the track. When viewed only from an aerial photograph (which the Moab BLM did in 2007 and 2013) its current on-the-ground character is overblown. BLM's extensive reliance on aerial photographs and no physical field inventories has led to BLM incorrectly determining that the large Coyote Wash landscape lacks wilderness characteristics. This photograph represents several typical reclaiming old seismic lines in the area as well as many that are well outside the unit boundaries and cherry-stems.



Photograph #39 - Another past seismic line feature within the Coyote Wash landscape. Again, the on-the-ground evidence of the condition of this and other past mineral exploration features is drastically different than that from any cursory aerial evaluation. BLM's reliance on aerial photographs is a good first step, but as clearly demonstrated here, features can appear dramatically different on the ground. Further, the determination of naturalness is done in context of the surrounding landscape and how the apparent naturalness appears to the average visitor who is not familiar with intimate detailed information. Caution should be used by BLM when assessing relatively minor human impacts, such as this one, on the naturalness of the area. BLM's lack of a field record only further indicates the pitfalls of such an evaluation. BLM is tasked to determine if all or portions of the area have wilderness characteristics and to date, the Moab BLM has not undertaken a proper evaluation of the Coyote Wash wilderness character area.

ATTACHMENT D

Unit No: UT-060-147

Name East Coyote Wash

Summary of Comments: 0 For Proposal 0 Against Proposal

None

District Analysis:

Recommendation by BLM:

Accept the initial recommendation to drop the unit from further wilderness consideration.

C. Delano Bachus
Area Manager

7/11/79
Date

District Manager

Date

S.D. Signoff:

I concur _____
Name

Date

I concur, as modified _____
Name

Date

E. Permanent Improvements

2 access roads

F. Land Treatments

At least 14 separate seige lines totalling 11 mi. (approx.)
Approx. 500 Ac. chaining and seeding in north end
of unit; approx 200 Ac. chaining and seeding in south
end of unit.

G. General vegetation and topographic features

Vegetation: piñon juniper

topography: Unit cut by Spring Canyon

H. Easements

I. Leases

oil and gas leases

J. Mining Claims

Heavy mining activity in area

K. Contiguous Lands

1/2 mi. of northern boundary is boundary of Manti-LaSalle
National Forest. This area of the Nat'l Forest
was not recommended for PARE II.

WILDERNESS INVENTORY
SITUATION EVALUATION

I. WILDERNESS UNIT IDENTIFICATION

Area/Island Name (if available): East Coyote Wash T295 R25E

Inventory Unit No.: UT-060-147

State Utah District Moab

Grand PA

II. UNIT ANALYSIS

Describe the following applicable factors in a concise narrative; use additional sheets if necessary; supplement with photographs.

A. Size of unit or number and size estimates of multiple units

6,400 Ac.

B. Ownership

BLM

C. Human Activity

11 mi. seige lines; 2 access roads totalling 3 mi.;
2 reservoirs

D. Existing Uses

Mining and mineral exploration; grazing

III. UNIT EVALUATION

A. Select one of the following:

1. The area appears to have potential for further wilderness consideration.
- ② The area obviously and clearly does not have potential for wilderness.

Explain your rationale for selection.

The unit has lost its natural character due to substantial intrusions created by mining activities and access roads. The configuration of the unit is not conducive to wilderness experience.

The unit is nearly bisected by an established access road. A second access road cuts into the unit.

The unit is covered throughout by evidence of sieve lines used for minerals exploration.

The configuration is such that no part of the unit is more than 1 mi. from a road. This does not lead to outstanding solitude or primitive recreation. Therefore wilderness experience attributes are not seen in the unit. The unit is relatively small.

The unit is not recommended for further study because 1) it has lost its natural character; and 2) the configuration of the unit is such that outstanding opportunities for solitude and/or primitive recreation are lacking.

B. Is area or island of sufficient size? *yes*

C. Is there enough public support for intensive wilderness inventory of the area or island or any part? *no*

IV. UNIT RECOMMENDATION (Check appropriate block.)

A. Area or island (or groupings) is recommended for intensive wilderness inventory...

B. Area or island (or groupings) is recommended as not qualifying for further inventory and should be dropped from the wilderness review process.

✓ P. 21

Diana Webb
STAFF SIGNATURE

Feb 19 1979
DATE

V. APPROVAL

C. Delano Bachus
AREA MANAGER

Feb. 24 1979
DATE

S. Gene Day
DISTRICT MANAGER

3/10/79
DATE

✓

OUTSTANDING OPPORTUNITY FOR PRIMITIVE AND UNCONFINED RECREATION (CONSIDER ACTIVITIES THAT PROVIDE DISPERSED, UNDEVELOPED RECREATION WHICH DO NOT REQUIRE FACILITIES OR MOTORIZED EQUIPMENT).

Very little opportunity for primitive recreation. The mudflats and lake beds are hot, dry and dusty with no water, very little vegetation and few signs of animal life. Sheep use part of the area for grazing.

EXPLAIN SUPPLEMENTAL VALUES SUCH AS ECOLOGICAL, GEOLOGICAL, OR OTHER FEATURE OF SCIENTIFIC, EDUCATIONAL, SCENIC, OR HISTORICAL VALUES WHICH MAY BE PRESENT IN THE UNIT).

None; only the Fish Springs Wildlife Refuge has important ecological values.

ARE THERE ANY AREAS OF PUBLIC LAND, LESS THAN 5,000 ACRES, THAT SHOULD BE INVENTORIED FOR WILDERNESS CHARACTERISTICS? WHERE ARE THEY LOCATED, AND WHAT ARE THE CHARACTERISTICS?

WILDERNESS CHARACTERISTICS REVIEW

Date of Submission: *December 30, 2003*

Date(s) of Field Office Review: *December, 2006- February, 2007*

Submitter: *SUWA*

Name of Area to be Reviewed: *Coyote Wash*

BLM Field Office(s) Affected: *Moab*

EVALUATION

1.) Was new information submitted by a member of the public for this area?

YES _____. NO X_____.

2.) If new information was submitted, describe the submission. For example, did the submission include a map that identifies the specific boundaries of the area(s) in question; a narrative that describes the wilderness characteristics of the area and documents how that information differs from the information gathered and reviewed in prior BLM inventories; photographic documentation; etc?

The area reviewed was derived from a GIS Data Layer provided by the proponent. New information such as maps, photographs, or narratives were not included.

3. As a result of interdisciplinary review of relevant information (which may include aerial photographs, state and county road information, road maintenance agreements, documentation from prior BLM inventories, field observations, maps, master title plats, evidence presented as new information by a proponent, etc.), do you conclude:

X a) the decision reached in previous BLM inventories that the area lacks wilderness characteristics is still valid.

(or)

_____ b) some or all of the area has wilderness characteristics as shown on the attached map.

4. Describe your findings regarding specific wilderness characteristics and provide detailed rationale.

See attached narrative

5. Document all information considered during the interdisciplinary team review (e.g. aerial photographs, state and county road information, road maintenance agreements, documentation from prior BLM inventories, field observations, maps, master title plats, evidence presented as new information by a proponent, etc.)

During the course of the interdisciplinary team review, Moab BLM undertook the following steps:

In late 2006 and early 2007, BLM used GIS information to identify potential impacts on naturalness including county road data (previously verified as part of travel plan formulation), and local BLM GIS data on range improvements, oil and gas wells, vegetative manipulations (especially chainings), and community pits. Master Title Plat data available from the State Office GIS was examined for rights-of-way.

BLM Moab next undertook a detailed review of high resolution aerial photos from 2006 to both verify information from the GIS review, as well as to look for additional impacts not incorporated in GIS. These impacts could include such things as seismic exploration lines not included in the county road inventory and other disturbances from past minerals activities.

The above steps enabled Moab BLM to prepare a map showing what remaining areas were likely to possess naturalness. As described in the attached narrative, most of this unit acreage is marked by a large number of roads and other impacts, mostly from past uranium mining activities. The only lands in the unit appearing generally natural are located in the center of the unit, but are of insufficient size to possess wilderness characteristics.

Moab BLM convened an interdisciplinary review team meeting on January 11, 2007, to review the findings from the above steps. Team members were asked to provide information which either supported or refuted these findings, based on both specialized resource expertise and field experience. Based on input from this review, Moab BLM incorporated any necessary changes into its analysis.

The following specific documents and files were utilized:

- 1 San Juan County road inventory*
- 2 Lisbon range allotment file*
- 3 NAIP 2006 aerial photos (GIS)*
- 4 Vegetative treatments (local GIS)*
- 5 Range improvements (local GIS)*
- 6 UWC Proposed Wilderness GIS Data Layer (2005)*

6. List the members of the interdisciplinary team and resource specialties represented.

<i>Name</i>	<i>Resource(s) Represented</i>
-------------	--------------------------------

<i>Name</i>	<i>Resource(s) Represented</i>
<i>Bill Stevens</i>	<i>Wilderness, GIS, Recreation</i>
<i>Ann Marie Aubry</i>	<i>Hydrology, Soils</i>
<i>Brent Northrup</i>	<i>Minerals, RMP Team Lead</i>
<i>Chad Niehaus</i>	<i>Recreation</i>
<i>Daryl Trotter</i>	<i>Botany, NEPA coordinator</i>
<i>Donna Turnipseed</i>	<i>Cultural, Paleontology</i>
<i>Katie Stevens</i>	<i>Recreation, Planning</i>
<i>Lynn Jackson</i>	<i>Geology, Minerals, Associate FO Manager</i>
<i>Pam Riddle</i>	<i>Wildlife</i>
<i>David Williams</i>	<i>Range</i>
<i>Maggie Wyatt</i>	<i>Field Office Manager</i>

Field Office Manager /s/ Maggie Wyatt

Date 3/9/07

This determination is part of an interim step in BLM's internal decision-making process and does not constitute a decision that can be appealed.

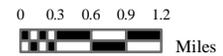
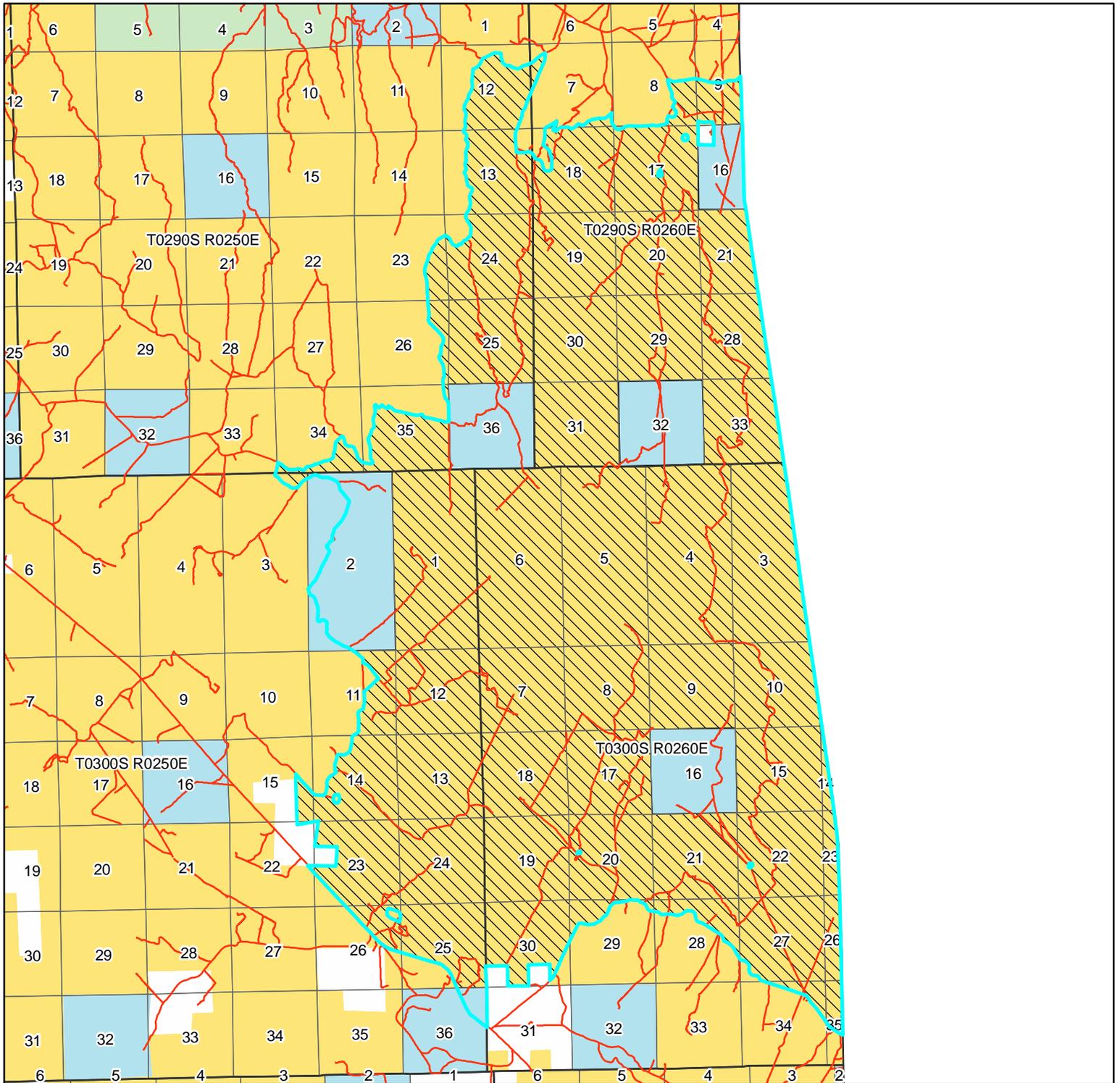
Analysis of Citizens' Proposals for Wilderness Characteristics

Coyote Wash

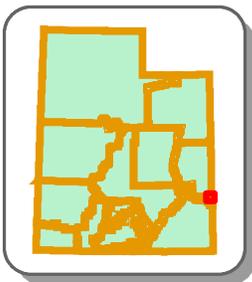
The Citizens' Proposal is a stand-alone unit along the Colorado state line; it is in the southeast corner of the Moab Field Office.

To possess wilderness characteristics, lands must possess naturalness and outstanding opportunities for solitude or primitive and unconfined recreation. According to the 1964 Wilderness Act, these outstanding opportunities generally require a land mass of 5000 acres or more. An exception to this are those lands which adjoin other lands already judged to possess wilderness characteristics, as the opportunities need be present *somewhere* in the larger unit. In the case of Coyote Wash, the proposed area does not adjoin any other area evaluated as possessing wilderness characteristics. As such, it must possess such characteristics on its own.

Coyote Wash does not have wilderness characteristics. Coyote Wash includes lands that have been heavily impacted by past mining activities, especially during the uranium boom of the past century. The area is riddled with substantially noticeable mining routes, mining-associated disturbances, and seismic exploration lines. The San Juan County road inventory, verified by BLM, indicates approximately 76 miles of interior routes on public lands within the proposal area. Aerial photographs from 2006 indicate many more miles of constructed routes above and beyond the County inventory. The only portion of the area not completely bisected by substantially noticeable routes lies in the approximate center of the unit. As shown in the attached aerial photos, the areas encompassed by photos 1 and 2 show numerous impacts. Only a portion of the area encompassed in photo 3 appears natural, but this area is of insufficient size to manage as a stand-alone unit.



1:103,452



Legend

— San Juan Co Identified Routes

Wilderness Characteristics Review

▨ NWC

▨ WC

Land Status

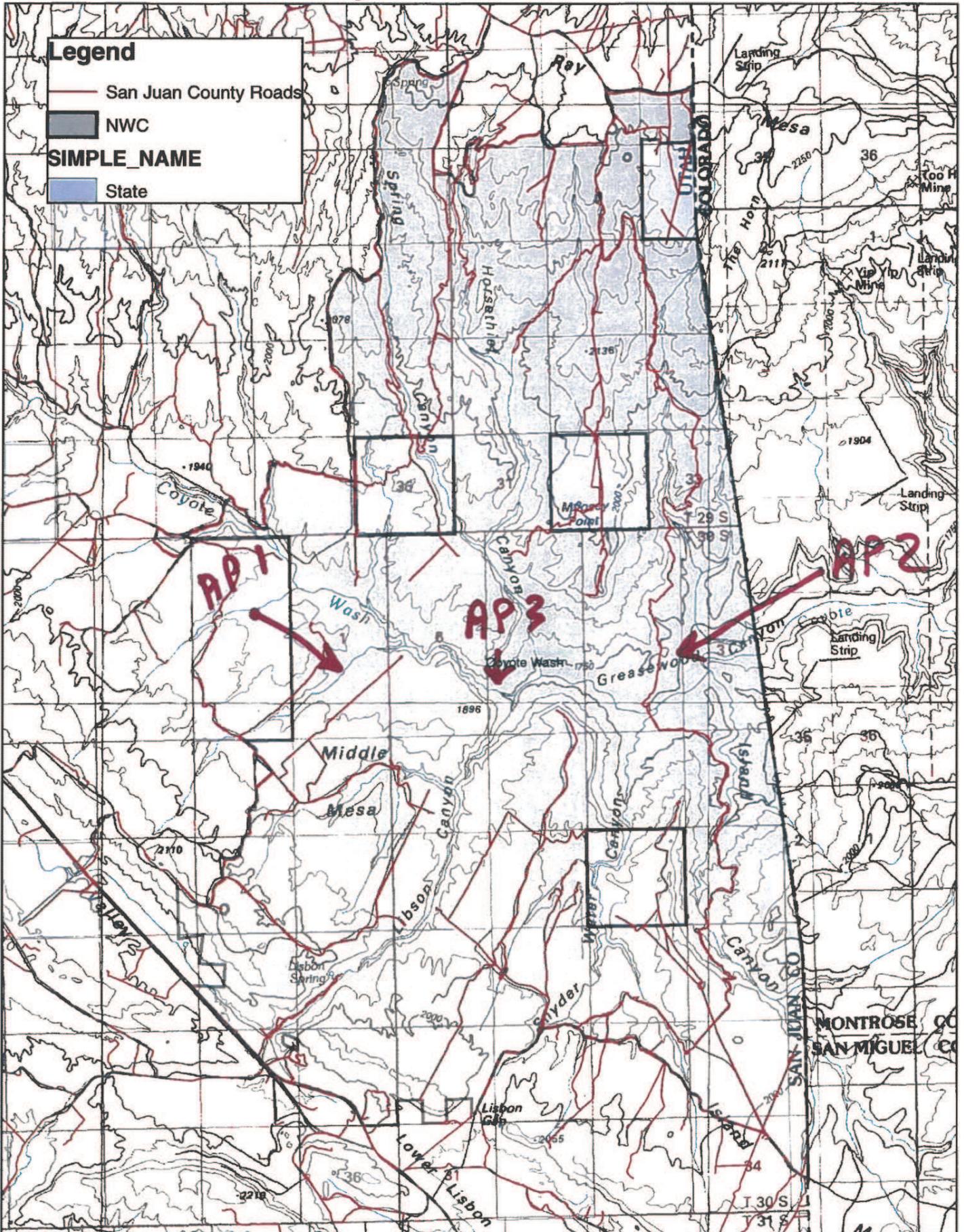
Bureau of Land Management	Military Reservations
BLM Wilderness Area	State Lands
National Forest	Private Lands
National Park Service	Water
Indian Lands	

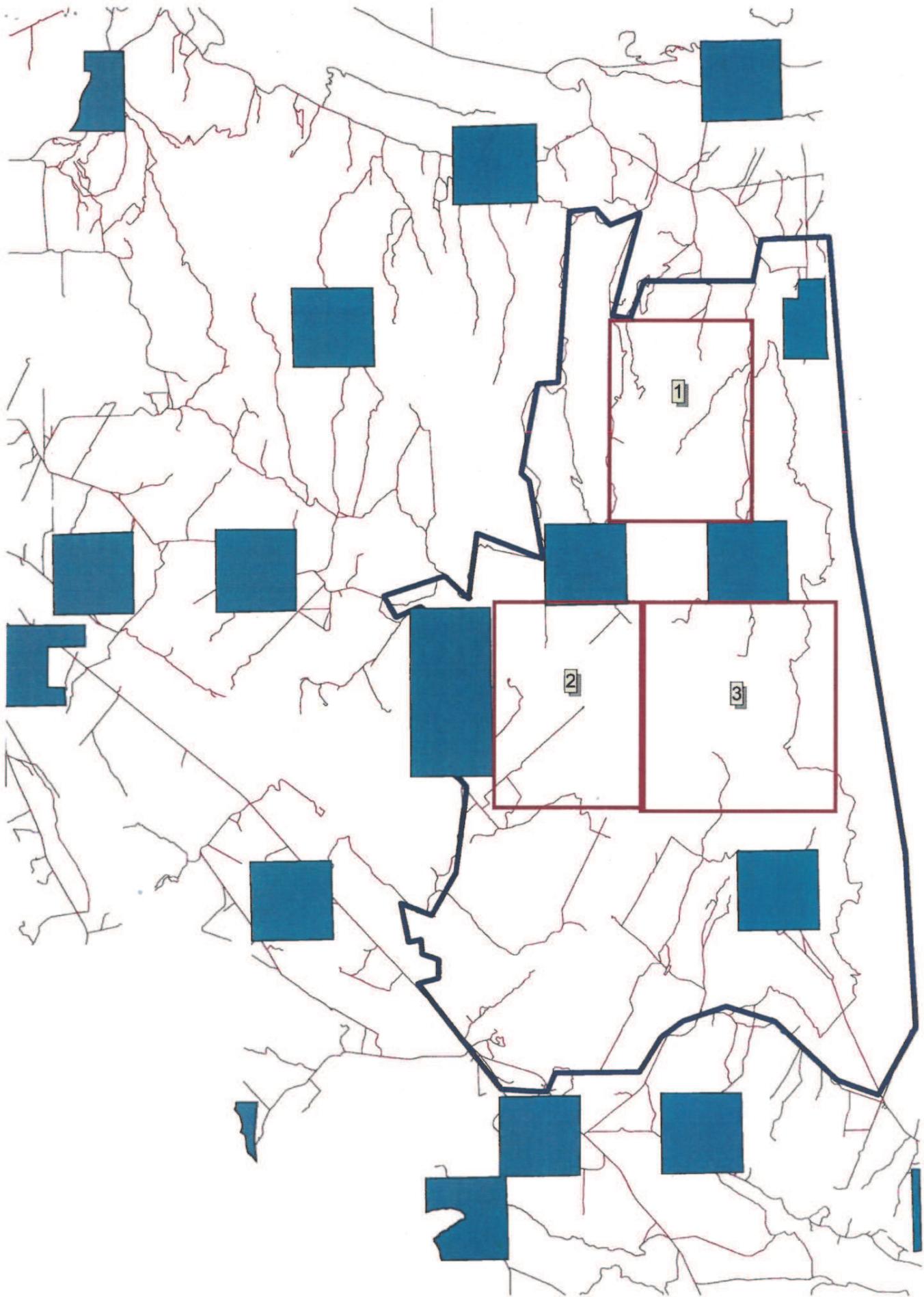
CAUTION:
 Land ownership data is derived from less accurate data than the 1:24000 scale base map. Therefore, land ownership may not be shown for parcels smaller than 40 acres, and land ownership lines may have plotting errors due to source data.

No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.



Coyote Wash CP

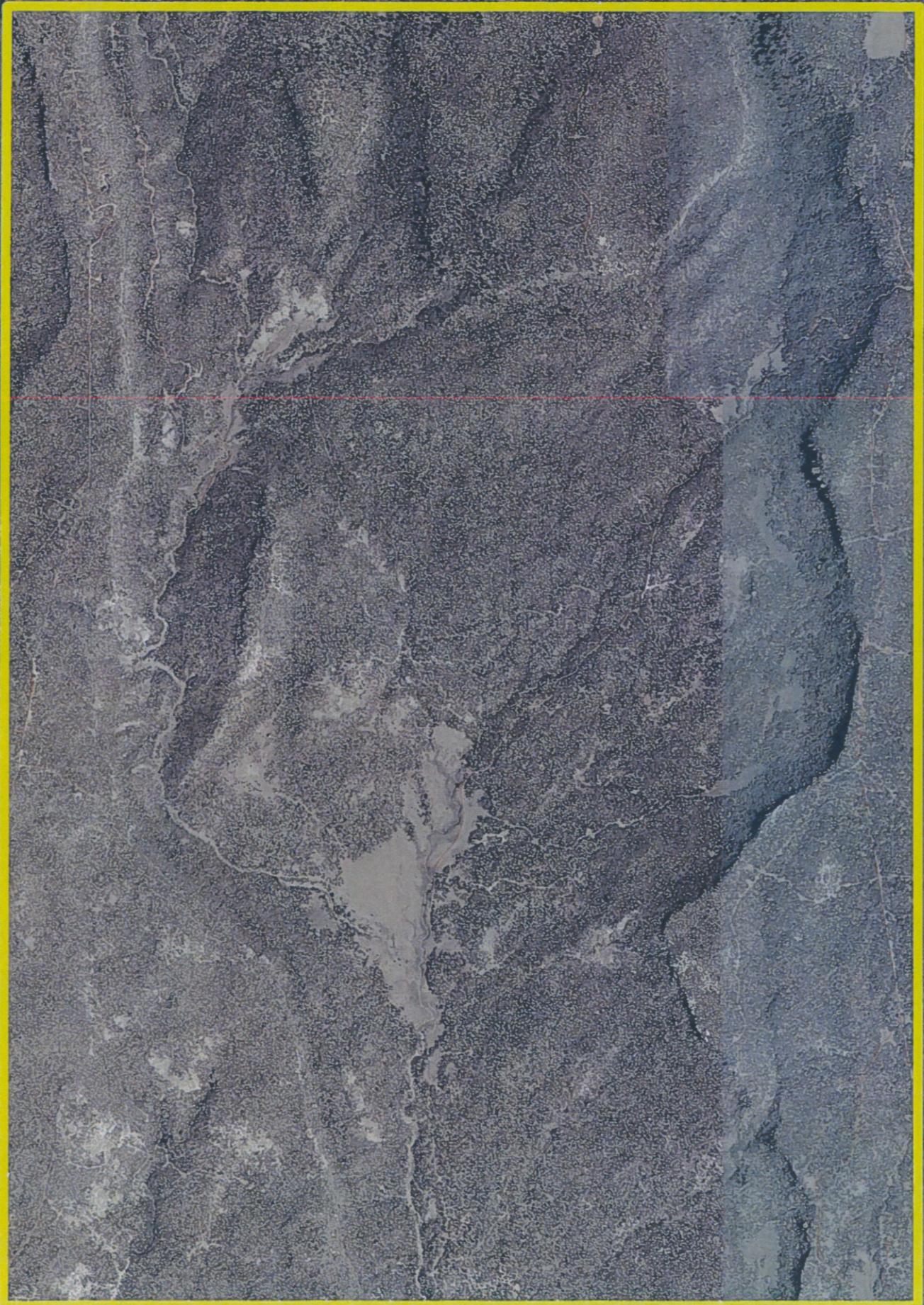




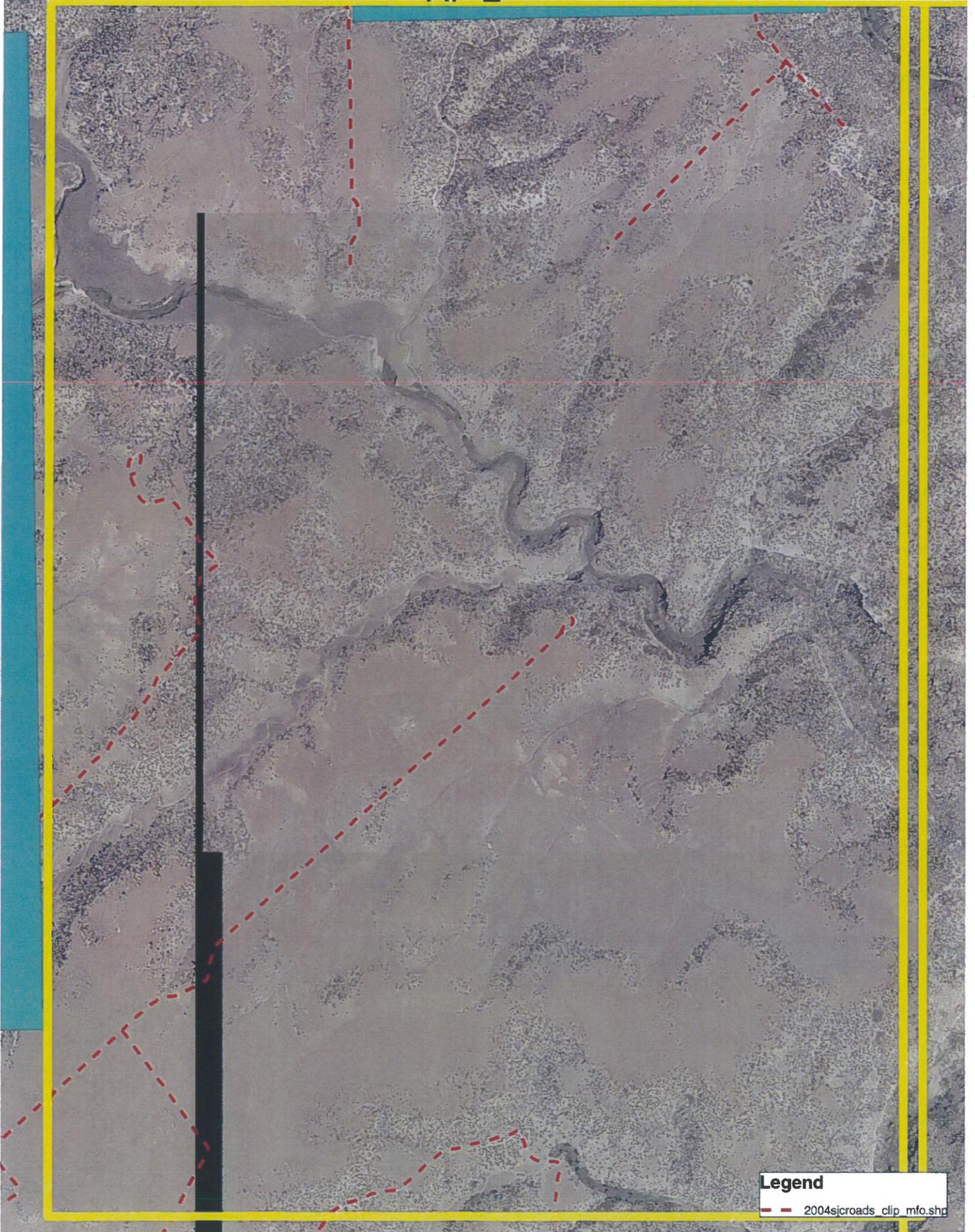
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AP 1

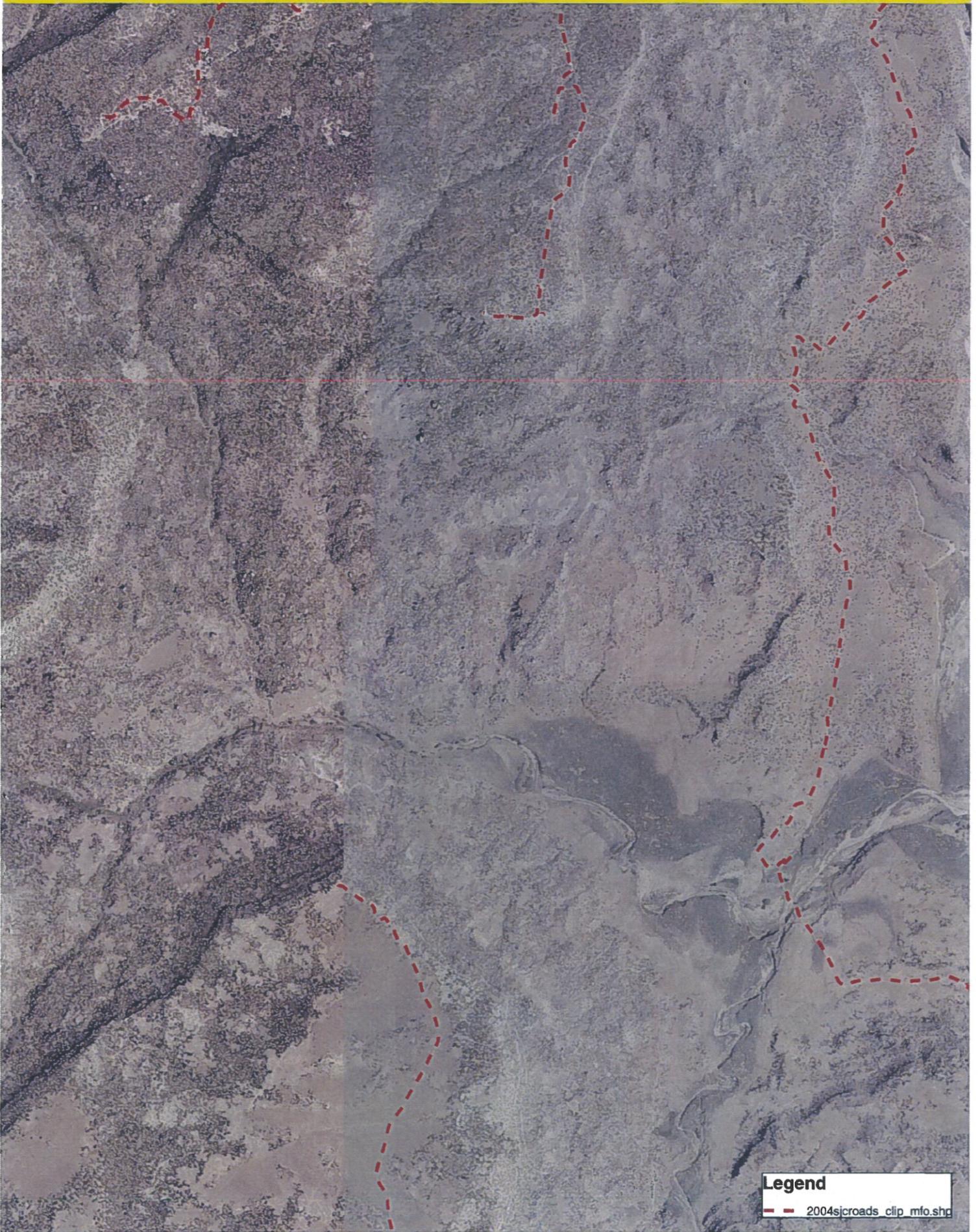


AP 2



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AP 3



Staff Report
Wilderness Characteristics Review
Coyote Wash
Bill Stevens, Outdoor Recreation Planner
Moab Field Office
January 31, 2013

As part of the analysis for lease parcels potentially being offered in the February 2013 sale, BLM personnel in the Moab FO undertook a review of earlier findings of the lack of wilderness characteristics in the area known as Coyote Wash, and proposed for wilderness by external groups. Moab BLM had reviewed this area earlier (2007) as part of a Wilderness Characteristics Review leading into the 2008 Moab RMP. At that time, Moab BLM determined that the area in question lacked wilderness characteristics due to a large number of roads and other disturbances resulting from past minerals exploration and development. The 2007 review procedures were consistent with the procedures outlined in Manual 6310 and IM 2011-154 for wilderness characteristics review. Because BLM determined that the area in question lacked wilderness characteristics, it was not designated as a Natural Area in the 2008 Moab RMP.

As part of the Environmental Assessment accompanying the February 2013 lease sale, Moab BLM staff undertook an additional review of the Coyote Wash area. The steps undertaken as part of this review are consistent with current guidance on determining whether an area possesses wilderness characteristics. This review had several components:

1. On August 2, 2012, BLM personnel visited the parcels potentially being offered for lease in the February 2013 proposed sale. Rock Smith (FO Manger) and Katie Stevens (Outdoor Recreation Planner) reported to me that the parcels in question were bisected by existing roads, and were not in a condition likely to possess wilderness characteristics.
2. Prior to field trips, parcels that overlapped citizens' proposed wilderness in the Big Triangle and Coyote Wash areas were identified.
3. In addition to field reviews undertaken by the multidisciplinary ID team, I personally performed an exhaustive review of 2011 GIS-incorporated aerial photos of the area in question, and observed a large number of roads and other impacts, including an operating copper mill tailings pond. This review confirmed field office personnel's overall impression of the area in question.

We have received no additional information, either internally or externally, to call our original conclusions into doubt. For this reason, it is appropriate to conclude on the EA checklist that wilderness characteristics for those parcels being carried forward in the February 2013 offering were "Not Present (NP)". Oil and gas leasing is therefore consistent with the management decisions of the 2008 Moab RMP.

Bill Stevens

Appendix C – Interdisciplinary Team Checklist
INTERDISCIPLINARY TEAM CHECKLIST

Project Title: February 2013 Oil and Gas Lease Sale

NEPA Log Number: DOI-BLM-UT-Y010-2012-0190-EA

File/Serial Number: Not Applicable

Project Leader: Lisa Bryant/Katie Stevens

DETERMINATION OF STAFF

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that need to be analyzed in detail in the EA

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale column may include NI and NP discussions.

For parcels 207, 209, 210, 211, 258, 259, and 260, Moab FO incorporates the checklist prepared by the Monticello FO in EA DOI-BLM-UT-Y020-2012-0038.

Determination	Resource	Rationale for Determination	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX I H-1790-1)				
PI	Air Quality	<p>Grand and San Juan Counties are in attainment of the National Ambient Air Quality Standards (NAAQS) for all pollutants. Currently air quality in the area of the proposed leasing meets State Department of Environmental Quality and the Division of Air Quality Standards.</p> <p>Leasing would have no impact on air quality. However, there is some expectation that exploration could occur. Any ground disturbing activity would have to first be authorized as a lease operation but only through additional NEPA analysis.</p> <p>Activities which may be authorized on these parcels subsequent to the lease sale may produce emissions of regulated air pollutants and/or pollutants that could impact air quality related values at nearby Class 1 areas. Emissions from earth-moving equipment, vehicle traffic, drilling and completion activities, separators, oil storage tanks, dehydration units, and daily tailpipe and fugitive dust emissions could affect air quality.</p> <p>Application of stipulation UTSO-S-01 is warranted. Lease notices UT-LN-99 (ozone formation control) and UT-LN-102 (air quality analysis) will also be attached to each lease parcel.</p>	Ann Marie Aubry/ Leonard Herr	8-21-2012
NP	Areas of Critical Environmental Concern	There are no Areas of Critical Environmental Concern within any of the lease parcels (see Map 21, 2008 Moab RMP). None of the parcels are located within a Potential ACEC identified in the Moab RMP process.	Katie Stevens	07/26/12
NP	BLM Natural Areas	There are no BLM Natural Areas within any of the lease parcels (See Map 16, 2008 Moab RMP).	Bill Stevens	07/26/12
NP	BLM/State Sensitive Plant Species	Resource not present.	Dave Williams	8/17/12
NI	Cultural Resources	As it authorizes no ground disturbance, the proposed lease sale will have no direct effect on cultural resources. A Class I survey (existing literature review) of the proposed	Don Montoya	8/20/2012

Determination	Resource	Rationale for Determination	Signature	Date
		<p>sale (project number DOI-BLM-UT-9100-00005) indicated that the areas around each offered parcel are of sufficiently low site density that the avoidance of historic properties potentially Eligible for the National Register of Historic Places will not preclude surface development within the parcel and extraction of the leased minerals.</p> <p>A 100% pedestrian survey has not been completed within the APE; therefore, to assure appropriate consideration of future effects from the lease sale, the BLM would add the cultural resources protection stipulation as defined in WO IM 2005-003 to all parcels. If additional, site specific resource protection measures are needed to prevent unnecessary or undue degradation; these would be prepared at the APD stage.</p> <p>Application of the Cultural Resources Stipulation from WO IM 2005-003 is warranted. To address cultural site, structure, object and traditional use area protective measures, stipulation UT-S-322 (cultural resources) is also applied to all parcels. Lease notice UT-LN-65 is applied to parcel 119 for management of the Old Spanish Trail.</p> <p>The Utah Protocol Part VII.A.B. has been applied to the cultural resource review for this lease sale. Parcels with potential for high density were deferred. The remaining parcels have low to medium site density, providing sufficient flexibility to avoid impacts to cultural resources during subsequent exploration and development activities. Thus the recommended determination for SHPO consultation is "No Historic Properties Affected" due to the ability to avoid cultural sites. SHPO concurrence was received on September 19, 2012.</p>		
NI	Greenhouse Gas Emissions	<p>In addition to the air quality information contained within the FEIS, new information about greenhouse gases (GHGs) and their effects on national and global climate conditions has emerged since RMP was prepared. Without additional meteorological monitoring and modeling systems, it is difficult to determine the spatial and temporal variability and change of climatic conditions; what is known is that increasing concentrations of GHGs are likely to accelerate the rate of climate change.</p> <p>Determining GHG emissions, their relationship to global climatic patterns, and the resulting impacts is an ongoing scientific process. The BLM does not have the ability to associate a BLM action's contribution to climate change with impacts in any particular area. The technology to be able to do so is not yet available. The inconsistency in results of scientific models used to predict climate change at the global scale coupled with the lack of scientific models designed to predict climate change on regional or local scales, limits the ability to quantify potential future impacts of decisions made at this level and determining the significance of any discrete amount of GHG emissions is beyond the limits of existing science. When further information on the impacts to climate change is known, such information would be incorporated into the BLM's planning and NEPA documents as appropriate.</p> <p>It is currently not feasible to know with certainty the net impacts from leasing and any potential exploration on</p>	Ann Marie Aubry/ Leonard Herr	8-21-2012

Determination	Resource	Rationale for Determination	Signature	Date
		climate. While BLM actions may contribute to the climate change phenomenon, the specific effects of those actions on global climate are speculative given the current state of the science. Leasing the subject parcels would have no direct impacts on climate as a result of GHG emissions. There is an assumption; however that leasing the parcels would lead to some type of exploration that would have indirect effects on global climate through GHG emissions. However, those effects on global climate change cannot be determined. It is unknown whether the petroleum resources specific to these parcels are gas or oil or a combination thereof. Since these types of data as well as other data are unavailable at this time, it is also unreasonable to quantify GHG emission levels.		
NI	Environmental Justice	Minority and low income populations do exist in the Moab FO area. The PRMP/FEIS, 2008 adequately assessed impacts to environmental justice populations as defined in Executive Order 12898 and it was determined that no BLM action proposed across all alternatives or the Proposed Plan would target or cause any disproportionate impacts to any minority or low income segments of the population (PRMP/FEIS, 2008 p. 4-253). As defined in EO 12898, minority, low income populations and disadvantaged groups may be present within the counties involved in this lease sale. However, all citizens can file an expression of interest or participate in the bidding process (43 CFR §3120.3-2). The stipulations and notices applied to the subject parcels do not place an undue burden on these groups.	Bill Stevens	07/26/12
NP	Farmlands (Prime or Unique)	The Moab Field Offices FEIS did not identify any Prime or unique farmland with the field office area. FEIS pg. 4.8. The soils in these areas are not irrigated; therefore they do not qualify as prime or unique.	Lisa Bryant	8/17/12
NI	Floodplains	At this stage (lease sale) there is no potential to affect floodplains. However, there is some expectation that drilling and development could occur, at which time additional NEPA would be conducted. Potential project-specific impacts relating to future authorizations will be analyzed when an exploration or development application is received. At that time site specific surveys will be completed and measures to protect floodplains will be applied as necessary. Floodplains could be impacted by surface disturbance within or adjacent to floodplain, including roads, well pads and pipelines. Requirements for pipelines crossing stream channels are provided for in the RMP Appendix H. Stipulation UT-S-122 do not allow surface disturbing activity within the 100 year floodplains or within 100 meters of riparian areas. UT-S-122 is warranted on all parcels.	Ann Marie Aubry	8-21-12
NI	Fuels/Fire Management	At this stage (lease sale) there are no impacts to Fuels/Fire Management. Impacts (both direct and indirect) would occur when the lease is developed in the future. The potential impacts would be analyzed on a site-specific basis at the APD stage prior to development. Fuels vary from lease to lease but generally consist of Ponderosa Pine, Pinyon Juniper, Sage Brush and small shrubs and forbs.	Joshua Relph	8/8/2012

Determination	Resource	Rationale for Determination	Signature	Date
NI	Geology / Mineral Resources/Energy Production	<p>The parcels are located within the Paradox Fold and Fault Belt. Oil and gas resources in this area of the paradox basin occur primarily in the Porous Carbonate Buildup Play within the Paradox Formation and have a high potential for occurrence. Depending on the success of oil and gas well drilling, non-renewable natural gas and/or oil would be extracted and delivered to market. Production of oil and/or gas would result in the irretrievable loss of these resources. A Reasonably Foreseeable Development Scenario (RFD, 2005) was prepared as part of the Moab RMP.</p> <p>Environmental impacts of the RFD were analyzed and are documented in the RMP/EIS. The proposed action (one well on each lease parcel) would not exceed the level of activity predicted in the RFD.</p> <p>Portions or all of parcels UT0213-119 and UT0213- 200 are underlain by active uranium mine workings associated with the La Sal Mines Complex. Lease notice UT-LN-108 (La Sal Mines Complex) would be added to these parcels.</p> <p>Portions of parcels UT0213 - 209, and UT0213 - 255 are located within the mine permit boundary for the Lisbon Valley Copper Mine. This mine is an active open pit operation and parcels within the permit boundary may have waste rock piles, heap leach pad operations, open pit mining, exploration and other activities related to the copper mining operation. Lease notice UT-LN-109 (Lisbon Valley Copper Mine) is added to these parcels.</p> <p>The FEIS adequately addresses the impacts of oil and gas leasing. While conflicts could arise between oil and gas operations and other mineral operations, these could generally be mitigated under the regulations 3101.1-2, where proposed oil and gas operations may be moved up to 200 meters or delayed by 60 days and also under the standard lease terms (Sec. 6) where siting and design of facilities may be modified to protect other resources. The RFD remains valid.</p>	Rebecca Doolittle	08/06/2012
NI	Groundwater	<p>As detailed in Appendix D, parcels or portions thereof, which contained ground water protection zones, have been deferred. As per public comments additional discussion regarding groundwater is found in Appendix E and within section 1.8. At this stage (lease sale) there is no potential to affect groundwater. However, there is some expectation that drilling and development could occur, at which time additional NEPA would be conducted. Potential project-specific impacts relating to future authorizations will be analyzed when an exploration or development application is received. At that time measures to protect groundwater will be applied as necessary.</p> <p>Standard operating procedures (SOPs) required by regulation and site specific mitigation contained in an approved APD would be sufficient to isolate and protect all usable groundwater zones. The SOPs include the requirements for disposal of produced water contained in Onshore Oil and Gas Order (OOGO) No. 7 and the requirements for drilling operations contained in OOGO No. 2. Potential fresh water aquifers would be cased and cemented. The casing would be pressure tested to ensure integrity prior to drilling out the surface casing shoe plug. The lease parcels are not within any Sole Source Aquifers</p>	Ann Marie Aubry	8-21-12

Determination	Resource	Rationale for Determination	Signature	Date
		<p>or Drinking Water Source Protection Zones (DWSPZs). These potential impacts will be addressed and mitigated utilizing IM UT 2010-055 prior to APD approval.</p> <p>The issuance of leases would not directly impact surface and groundwater quality. Project-specific impacts to the surface and groundwater quality relating to future authorizations cannot be analyzed until an exploration or development application is received. Management guidance and stipulations in the Moab Field Office RMP provide for the protection of surface water resources.</p> <p>Ground water quality protection for oil and gas leasing, exploration, and development is outlined in UT IM 2010-055 (http://www.utso.ut.blm.gov/Bulletin/lookupdetail.asp?ID=550&Category=IMs&Field_Office=&theMonth). The purpose of this IM is to enhance the existing process for the continued protection of all usable ground water zones ($\leq 10,000$ mg/L as defined in Onshore Oil and Gas Order No. 2) associated with oil and gas exploration and development, will be followed. According to the IM, Sole Source Aquifers (SSAs) and Drinking Water Source Protection Zones (DWSPZs) are designated drinking water aquifers, and require additional analysis and protection. Additionally, prior to any drilling activity, a rigorous engineering review will be conducted for any down hole activities, and appropriate regulatory and mitigation measures will be applied.</p>		
NI	Invasive Species/Noxious Weeds (EO 13112)	<p>No known noxious plants occur within the parcels. Invasive plants that occur throughout these parcels in isolated pockets are cheatgrass (<i>Bromus tectorum</i>), Russian thistle (<i>Salsola kali</i>), Salt Cedar (<i>Tamarix spp.</i>) and halogeton (<i>Halogeton glomeratus</i>).</p> <p>At this stage (lease sale) there would be no impact (direct or indirect) to Invasive Species/Noxious Weeds. However, there is an expectation that development will occur in the future, at which time additional NEPA would be conducted. At the development stage, mitigation measures and best management practices would be incorporated to avoid the spread of undesirable non-native plant species. These BMPs/COAs include such activities as pressure washing earth moving equipment prior to moving onto a new construction location, and treatment and control of weeds using integrated pest management techniques according to BLM protocols. Therefore, invasive species/noxious weeds would be addressed in more detail during the APD process as a COA.</p>	Jordan Davis	8/2/12
NI	Lands/Access	<p>The ROD allows for oil and gas development with associated road, pipeline and power line right-of-ways. Oil and gas leasing is not expected to affect access to public lands. Leasing would be subject to all valid pre-existing rights.</p> <p>Any proposals for future projects within the oil and gas lease area would be reviewed on a site-specific basis and other right-of-way holders in the area would also be notified, as per regulations, when an application for right-of-way is received by this office.</p>	Jan Denney	8/7/12
NP	Lands With Wilderness Characteristics	There are no lands that BLM determined to have wilderness characteristics (see Map 15 of the 2008 Moab RMP). Section 1.8.4 has been added to the EA based on	Bill Stevens	07/26/12

Determination	Resource	Rationale for Determination	Signature	Date
		public comment and receipt of the Big Triangle Wilderness Characteristic Unit submission.		
NI	Livestock Grazing	At this stage (lease sale) there is no potential to affect (both direct and indirect) current livestock operations. Existing range improvements and studies within the proposed lease parcels would need to be avoided by 200 meters during the development of oil and gas facilities. In the future the proposed action might include mitigation to avoid harassment of livestock, stock watering facilities and the repair of any fences damaged during the APD or exploration processes.	Jordan Davis	8/20/12
NI	Native American Religious Concerns	As summarized in sections 5.2 and 5.2.1, eleven tribes or pueblos were contacted. Consultation letters were sent to the Tribes on August 17, 2012. Responses were received from one tribe, the Hopi. Partially as a result of this consultation, six parcels were deferred for concerns about cultural density. This correspondence is part of the record. Native American Religious Concerns were not identified by these tribes. The issuance of leases would not directly impact Native American Religious Concerns. Project-specific impacts relating to future authorizations cannot be analyzed until an exploration or development application is received. At that time site specific surveys and further consultation would be completed and conditions of approval to protect Native American Religious concerns could be added to the APD.	Donald Montoya	8/20/12
NI	Paleontology	The RMP did not identify oil and gas lease stipulations for paleontological resources. However, one of the RMP goals and objectives identified for paleontological resources states " <i>Protect paleontological resources from surface-disturbing activities (RMP, 79).</i> " Because of the high fossil potential in the Moab Field Office, it is appropriate to apply a lease notice to parcels with a moderate to high potential fossil yield classification. This lease notice notifies the lessee that if they develop their lease, they may have to conduct paleontological surveys. Using GIS data, the potential fossil yield classification for each parcel was identified and the lease notice was applied to those parcels that had a PFYC of 3 or higher. Lease notice UT-LN-72 is warranted on all parcels. Attachment of this lease notice will adequately mitigate impacts to paleontological resources.	Rebecca Doolittle	07/26/2012
NI	Rangeland Health Standards	At this stage (lease sale) there is no impact (direct or indirect). The potential to remove vegetation, disturb soils, damage water resources, and affect water quality would be addressed during the exploration and APD operations, and would be analyzed during the exploration/APD processes.	Jordan Davis	8/20/12
PI	Recreation	The area of the parcels is used for dispersed recreation such as hunting and hiking. Five of the parcels are within SRMAs.	Katie Stevens	07/26/12
NI	Socio-Economics	Oil and gas leases on Federal lands contribute to local government revenues through mineral lease payments. In Utah, these payments consist of bonus lease payments, annual lease rentals and royalties based on production. Of the total amount of mineral lease payments remitted to BLM, approximately 50 per cent is returned to the state.	Bill Stevens	07/26/12

Determination	Resource	Rationale for Determination	Signature	Date
		<p>The state then remits approximately one half of these payments back to the counties in the form of direct appropriations and grants and loans for specific projects funded by the Permanent Community Impact Board.</p> <p>Bonus payments are one-time payments to the Federal government for a leased parcel of BLM land for a ten-year period. These payments contribute to state and local economies because a proportion of the payments are disbursed to state and local governments. Annual rental payments—\$1.50 per acre for the first 5 years and \$2.00 per acre each subsequent year—would also contribute to state and local government revenues. Future production on the proposed leases, should any occur, could contribute additional revenues to local governments in the form of production royalties. The lease action, itself, however, produces no such royalties.</p>		
NI	Soils including Biological Soil Crusts	<p>Leasing these parcels would not impact soil resources. However, there is some expectation that drilling and development could occur, at which time additional NEPA would be conducted. BMPs and SOPs to protect soil resources are defined in the Gold Book and in the Moab RMP. SOPs, BMPs and site specific design features including reclamation would be applied at the APD stage as COAs. Leasing and exploration would have minimal impact to soil resources.</p> <p>To minimize watershed damage on fragile soils (moderately to high saline soils) in parcel 15, stipulation UT-S-109 is applied which restricts activities (no surface disturbance) between December 1 and May 31 (see Appendix A for full stipulation language). Lease notice UT-LN-100 is also applied to parcel 015.</p> <p>Steep slopes or fragile soils occur on all of these parcels. Stipulation UT-S-329 for Timing limitations and controlled surface use on slopes greater than 30% are attached to protect the soil resource.</p>	Ann Marie Aubry	8-21-12
NI	Surface Water	<p>At this stage (lease sale) there is no potential to affect (either directly or indirectly) surface water resources. However, there is some expectation that drilling and development could occur, at which time additional NEPA would be conducted. Project-specific impacts to the surface water resources relating to future authorizations will be analyzed when an exploration or development application is received. Surface water quality could be impacted by surface disturbance (APD stage- well pads, roads and pipelines) in or near perennial or intermittent streams or springs. The Moab RMP provides for the protection of surface water resources with decision #SOL-WAT #5/ "allow no surface occupancy and preclude surface-disturbing activities (see Appendix A) within 100 year floodplains, within 100 meters of a natural spring or within public water reserves (p. 102, ROD). SOPs including interim and final reclamation required by regulation, and BMP and COA for site specific APD approvals would provide mitigation for potential indirect impacts to surface water quality.</p> <p>Stipulation UT-S-122 does not allow surface disturbing activity within the 100 year floodplains or within 100 meters of riparian areas. Also, no surface-disturbing</p>	Ann Marie Aubry	8-21-12

Determination	Resource	Rationale for Determination	Signature	Date
		activities are allowed within public water reserves or within 100 meters of springs. Application of stipulation UT-S-122 to all parcels is warranted.		
NP	Threatened, Endangered or Candidate Plant Species	There are no known occurrences of T&E and candidate plant species within these parcels. While USFWS identified potential habitat within these areas there are no known occurrences of these plants on these parcels. Additionally, the habitat for Jones cycladenia is steep rugged terrain, not conducive to drilling and would be further protected under soil related stipulations if necessary. Navajo Sedge is also not expected to occur within these parcels. The habitat is much further south and occurs along riparian/floodplains which, in the event that it was unexpectedly discovered, would be protected by NSO in floodplains, stipulation UT-S-122, which is applied to all parcels.	Dave Williams	8/20/12
NP	Wastes (hazardous or solid)	Hazardous or solid wastes would not be created or stored at the leasing stage. The construction, drilling, completion, testing, and production of an oil and gas well produce waste products including drilling and completion fluids and produced water. Standard operating procedures required by regulation, BMPs, and COAs attached to the approved APD would mitigate impacts and ensure proper containment and disposal of wastes generated from oil and gas activities.	Rebecca Doolittle	07/26/2012
NI	Wetlands/Riparian Zones	At this stage (lease sale) there is no potential to affect (either directly or indirectly) –wetland or riparian areas. However, there is some expectation that drilling and development could occur, at which time additional NEPA would be conducted. The Moab RMP ROD decision #RIP-7 states “preclude surface disturbing activities within 100 year floodplains and within 100 meters of riparian areas, public water reserves and springs” (ROD p.100). Requirements for pipelines crossing stream channels are also provided for in the RMP Appendix H. To protect Riparian Areas, application of stipulation UT-S-122 is warranted on all parcels.	Ann Marie Aubry	8-21-12
NP	Wild and Scenic Rivers	There are no suitable Wild and Scenic Rivers within any of the proposed parcels (see Map 22, 2008 Moab RMP)	Katie Stevens	07/26/12
NP	Wilderness/WSA	There are no Wilderness Areas or Wilderness Study Areas within any of the lease parcels. Designated Wilderness and Wilderness Study Areas are closed to mineral leasing per Federal Onshore Oil and Gas Leasing Reform Act of 1987 and 43 CFR 3100.0-3(2). Parcels proposed for sale are not located within designated wilderness or wilderness study areas and activity outside of these areas will not affect wilderness characteristics within the areas.	Bill Stevens	07/26/12
NI	Woodland / Forestry	Woodland production or restriction zones are or are not present on these parcels. At this stage (lease sale) there are no impacts to Woodland / Forestry. Impacts (both direct and indirect) would occur when the lease is developed in the future. The potential impacts would be analyzed on a site-specific basis at the APD stage prior to development.	Jordan Davis	8/20/12
NI	Vegetation Excluding Special Status Species	At this stage (lease sale) there are no impacts to vegetation resources. Impacts (both direct and indirect) would occur	Jordan Davis	8/20/12

Determination	Resource	Rationale for Determination	Signature	Date
		when the lease is developed in the future. The potential impacts would be analyzed on a site-specific basis at the APD stage prior to development.		
PI	Visual Resources	<p>There are no lands managed as VRM I within any of the lease parcels. Approximately 1395 acres of lands managed as VRM II are within the lease parcels UT0213-123 and UT0213-174. However, controlled surface use stipulations have been applied to those acres which would lessen the impacts to their visual resources. Application of UT-S-158 is warranted.</p> <p>Lease notice UT-LN-98 (Visual Resources and Natural Soundscapes) is applied to all parcels.</p>	Katie Stevens	7/26/12
NI	BLM/State Sensitive Fish and Wildlife Species	<p>Detailed information on the inclusion of the appropriate lease notices and stipulations are contained in the 2008 Moab RMP. Sensitive species habitat and criteria were identified for these species from GIS data layers developed by the BLM, Utah Division of Wildlife Resources/Utah Natural Heritage Program data and field office records. These habitats are addressed in the RMP and provided needed protections through stipulations or notices.</p> <p>Stipulation UT-S-272 (CSU/TL Burrowing Owl and/or Ferruginous Hawk Nesting) has been attached to parcels 15, 42, 119, 124, 171, 174, 200, 202, 209, 240, 246, 248-255, 258, & 260. This is sufficient to protect burrowing owl habitat at the leasing stage.</p> <p>Kit fox habitat can be found throughout the field office and Stipulation UT-S-298 (Kit Fox) is used to protect kit fox habitat on all parcels.</p> <p>White-tailed and/or Gunnison prairie dog habitat may be found on parcels 15, 42, 119, 123, 124, 200, 202, 209, 246, 250-255 and 258-260. A lease notice (UT-LN-25) will be applied to the appropriate parcels listed above. This notice is used to notify the lessee of the possible presence of prairie dogs at the leasing stage.</p> <p>Bald eagle winter habitat can be found throughout the field office. UT-S-275 has been attached to the appropriate parcels 42, 119, 124, 199, 202, 209, 246, 248-260 to notify the lessee of the possible presence of bald eagles at the leasing stage.</p> <p>Golden eagle habitat can be found on parcel 169. Stipulation UT-S-273 has been attached to this parcel, to notify the lessee of the possible presence of golden eagles at the leasing stage.</p> <p>Currently all Gunnison sage grouse habitats within the Moab Field Office have been unoccupied over 15 years. Three parcels contain minimal, potentially suitable habitat, 200 (21 acres), 202 (100 acres) and 240. These acreages are located on the edge of larger, unoccupied areas and this habitat is not substantially important to the overall suitability of the habitat, however a stipulation has been attached to address this very limited potential habitat (UT-S-215). Lease notice UT-LN-103 (Undetermined Gunnison Sage Grouse Habitat) is applied to these parcels.</p> <p>Other sensitive species may also be found on all leases therefore the Utah Sensitive Species lease notice (UT-LN-49) has been attached to all parcels to notify the lessee of</p>	Pam Riddle	8/20/12

Determination	Resource	Rationale for Determination	Signature	Date
		<p>the potential for sensitive species habitat.</p> <p>The appropriate stipulation or notice has been attached to each of the above listed parcel for each of the named species addressed above. Therefore leasing will not impact the species. Site-specific effects cannot be analyzed until an exploration or development application is received, after leasing has occurred.</p>		
NI	Fish and Wildlife Excluding Special Status Species	<p>Detailed information on the appropriate lease notices and stipulations are contained in the 2008 Moab RMP. The BLM works with Utah Division of Wildlife Resources along with others to develop the stipulations and notices as mitigation for the leasing stage. Further analysis and mitigation may be required at the project stage. Wildlife habitat and criteria were identified for these species from GIS data layers developed by the BLM, Utah Division of Wildlife Resources/Utah Natural Heritage Program data and field office records. These habitats are addressed in the RMP and provided certain protections through stipulations or notices.</p> <p>Habitat for deer and elk crucial winter range and fawning areas have been identified. UT-S-229 has been attached to the parcels (42, 119, 124, 171, 174, 199-202, 209, 240, 246-255 and 258-260) to protect winter ranges from November 15 through April 15th and UTU-S-246 to protect fawning grounds from May 15 through July 30th.</p> <p>Stipulation UT-S-246 is applied to protect fawning habitat that occurs on parcels 199 and 240.</p> <p>There is potential fawning habitat for pronghorn on parcel 15. In order protect potential fawning habitat for pronghorn lease notice UT-LN-15 for Pronghorn Fawning will be added to this parcel.</p>	Pam Riddle	8/20/12
PI	Migratory Birds	<p>The following documents are incorporated: Utah Comprehensive Wildlife Conservation Strategy (CWCS), Utah Partners in Flight Avian Conservation Strategy Version 2.0. (2002), Birds of Conservation Concern (2002), Executive Order 13186: Responsibilities of Federal Agencies to Protect Migratory Birds, MOU between the USDI BLM and USFWS to Promote the Conservation and Management of Migratory Birds (4/2010), and Utah Supplemental Planning Guidance: Raptor Best Management Practices (BLM UTSO IM 2006-096)</p> <p>Migratory birds are present within all of the proposed parcels. Migratory birds would not be impacted by the act of leasing itself but it implies that development may follow which may have an impact on migratory birds. Lease notice (UT-LN-45) for migratory birds is warranted for all parcels.</p> <p>Raptors habitat, either foraging or nesting, may be found on all of the parcels. Raptors would not be impacted by the act of leasing itself but it implies that development may follow which may have an impact on raptors; therefore a raptor habitat lease notice (UT-LN-44) has been attached to all of the leases to notify the lessee of the possible presence of raptor habitats and nesting at the leasing stage.</p>	Pam Riddle	8/20/12
NI	Threatened, Endangered or Candidate Animal	<p>The Moab Field Office has concurrence from the U.S. Fish and Wildlife Service that leasing may move forward without further consultation, based on consultation that</p>	Pam Riddle	8/20/12

Determination	Resource	Rationale for Determination	Signature	Date
	Species	<p>occurred during the Land Use Planning Process. The Biological Opinion issued on October 16, 2008 by the USFWS concluded with a determination "not likely to adversely affect" (ROD, Appendix B) with the application of the appropriate lease notices. To ensure that the information is current and all appropriate stipulations and notices are applied, informal consultation confirming the decisions made during that Land Use Planning process is ongoing.</p> <p>Consultation may be required at the time surface disturbing activities are proposed either through an APD, pipeline right-of-way or other oil and gas related surface disturbing proposal. Site-specific effects cannot be analyzed until an exploration or development application is received, after leasing has occurred. Until there is a site-specific proposal, there is no action directly or indirectly causing modifications to the land, water, or air, therefore "no effect" on any listed animal species or designated critical habitat.</p> <p>Mexican owl habitat is modeled and therefore may be present on most of these parcels. Lease notice T&E 06 will be attached.</p> <p>The Greenback Cutthroat Trout does not occur within any of these parcels.</p> <p>Habitat for the California Condor could occur on all parcels; therefore, notice T&E-11 is attached.</p> <p>Southwestern willow flycatcher habitat may be provided by the riparian areas found in parcels 119, 169, 174, 199, 200, 202 & 240. Lease notice T&E-08 has been applied to these parcels.</p> <p>Yellow-billed cuckoo habitat may be found on parcels 119, 169, 170, 174, 199, 200, 201 202, 240, and 249. Lease notice UT-LN-33 is applied to these parcels.</p> <p>Consultation with the USFWS is ongoing.</p>		

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	<i>ls\ Katie Stevens</i>	11/16/2012	Utah State Office staff may still be conducting consultation with USFWS. All recommended stipulations and notices have been added as of this date. If additional stipulations or notices are required they will amend our recommendations.
Authorized Officer	<i>ls\ Jeffrey R. Smith</i>	11/16/2012	Utah State Office staff may still be conducting consultation with USFWS. All recommended stipulations and notices have been added as of this date. If additional stipulations or notices are required they will amend our recommendations.