Comments of the Draft EIS by Commentor Type

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BUSINESSES				
Organization	**Record ID & Comment Number**		**Comment Text**	**Response to Comment**
Tag a Long	10	1	The entire Green River is suitable and should be designated as a Wild and Scenic River in order to maintain the connectivity and ecology of the Green River Corridor.	The section of the Green River from Swasey's Rapid to the San Rafael River contains large percentages of private and state land. It is for this reason that that section of the Green River is not proposed for Wild and Scenic River designation.
PacficCorp	12	1	The BLM has indicated that Alternative C is preferred which identifies 806,994 acres available for oil and gas leases and development but no new utility corridor or provisions for the required infrastructure.	Designation of utility corridors is intended to facilitate and channel major utilities that pass through the Moab Field Office area. These corridors are for major transmission lines, not individual distribution lines. Management actions in the DRMP/EIS address individual rights-of-way for arterial distribution lines and facility-specific tap lines. Until production is established on oil and gas leases, the location of power needs will not be known. Authorization of new electrical distribution lines would continue to be handled on a case by case basis, as is provided for in the DRMP/EIS.
PacficCorp	12	2	PacifiCorp does not support the BLM's proposal in the RMP to eliminate the existing utility corridor from Cisco to US Highway 191.	Under Alternatives C and D, the Interstate Highway 70 utility corridor has been widened to include all major existing utilities. The wider corridor merges two corridors designated in the 1985 Grand RMP. Currently, there are no rights-of-way for electrical lines within the corridor south of I-70. This language has been corrected to state that "the existing utility corridor from Cisco to Highway 191 north of Arches National Park would be merged with the I-70 corridor under all action alternatives" (pg. 4-65 of the DRMP/EIS). In addition, the statement on page 2-11 of

				the DRMP/EIS that the "utility corridor from Cisco to Highway 191 north of Arches has been eliminated" has been deleted from the text of the PRMP/FEIS.
PacficCorp	12	3	The RMP also contains many surface occupancy, visual or other resource constraints that could preclude new rights-of-way, development of renewable energy resources or construction of facilities required to service the growing development and surrounding areas.	Under all alternatives in the DRMP/EIS, the closure to rights-of-way of approximately 350,000 acres for Wilderness Study Areas (WSA) and Wilderness is not discretionary, and is beyond the scope of this plan. WSAs and designated wilderness are exclusion areas by Federal regulation. This represents 19% of the planning area under all alternatives. In the DRMP/DEIS, the remainder of the planning areas is managed as follows: All areas managed as closed are exclusion areas for rights-of-way. All areas managed as no surface occupancy are avoidance areas for rights-of-way. By combining no surface occupancy acreage and discretionary closed acreage by alternative, the following percentages of the Moab planning area are not available for rights of way: Alt B = 44%, Alt C = 15%; Alt D = 4%. It should be noted that the avoidance areas allow some flexibility in the development of rights-of-way. Conversely, under Alternatives B, C and D, 56% , 85%, and 96% of the Moab planning area (exclusive of WSAs and wilderness) would be open to rights-of-way with only minor restrictions, respectively. These minor restrictions include timing limitation and controlled surface use stipulations. See Appendix C of the DRMP/DEIS for details regarding avoidance and exclusion areas. The BLM concludes that it has offered a reasonable range of alternatives for the development of rights-of-way.
PacficCorp	12	4	A map submitted to the Department of Energy as part of the West-Wide Energy Corridor Programmatic identified current and proposed high-voltage transmission line	The map in the West Wide Energy Corridor Programmatic EIS (Map #66-212) identifies one corridor in the Moab planning area. The identified corridor in the West Wide

			locations within the study area.	Energy corridor Programmatic EIS is identical to the U.S. 191 corridor which is included in all alternatives of the DRMP/EIS.
PacficCorp	12	5	The BLM should expand its description on oil and gas development to include related electrical infrastructure and state that analysis and approvals of proposed development will include associated utlity facilities.	In the Moab planning area, electricity has not been essential for development of oil and gas resources. Where distribution lines are already present, oil and gas companies may select electricity to run pumps and cathodic protection sites. A Reasonably Foreseeable Development (RFD) scenario for oil and gas was prepared for the Moab Field Office as part of the DRMP/EIS. The RFD projected the amount of oil and gas development that would occur in the planning area over the next 15 years. Tthis projection includes infrastructure to support oil and gas, which consists of roads, pipelines, and electrical infrastructure.
PacficCorp	12	6	Pacificorp supports any effort to promote the development of all renewable electrical generation methods, especially wind development. Pacificorp asks that the BLM evaluate future proposals based on the current technology, scientific studies, and potenial resource impacts.	Under all action alternatives of the DRMP/EIS, wind and solar development can be considered wherever rights-of-way can be authorized. Avoidance and exclusion areas for rights-of-way are specified in Appendix C of the DRMP/EIS.
PacficCorp	12	7	The EIS states there is one bald eagle nest on the MPA on pg 3-178 and that there are three Bald eagle nests in the MPA on pg. 3-143.	There are three bald eagle nests on the Colorado River within the Moab planning area. One is located on BLM land and the other two are on private land. The reference on page 3-178 of the DRMP/EIS refers to BLM land only. The reference on pg. 3-143 of the DRMP/EIS is to all lands within the planning area.
PacficCorp	12	8	The Bald Eagle has been de-listed from a threatened status. It is uncertain from the language in the the draft whether the BLM's management objectives would be changed due to the status change.	See response to comment 121-56. Management objectives for bald eagles would not change because of the status change. Bald eagles remain federally protected.
PacficCorp	12	9	The DRMP/EIS states on pg. 4-365…."the existing utility corridor that runs from Cisco to US 191 would be eliminated which would help mitigate for the adverse effects of utility corridors on special status species. The	See response to comment 12-2 above. This corridor has not been eliminated, but has been widened to include this portion.

			BLM has not described in the EIS how the existing Cisco to US 191 utility corridor adversely affects special status species and why it needs to be eliminated.	
PacficCorp	12	10	PacificCorp asserts that the predation issue in unfounded and that these buffer restrictions are exessive and an unnecessary measure to protect the greater sage-grouse and prairie dogs.	For greater sage grouse, the management prescriptions apply to sage grouse strutting grounds, nesting, and brood-rearing habitat and active leks. For prairie dogs, the prescriptions refer to a 660 foot buffer around occupied colonies. The BLM has worked with the Utah Division of Wildlife Resources and the U.S. Fish and Wildlife Service to formulate prescriptions that would protect these animals so that they would not be listed as Endangered Species. It should be noted that the Moab planning area currently contains no active leks for either greater or Gunnison sage grouse. The buffer around leks is 2.0 miles. The prairie dog buffer is 660 feet.
PacficCorp	12	11	Chapter 3, Section 19, pg. 167 of the DRMP/DEIS states that visual resource inventory classes were considered in the EIS prepared for the RMP but the RMP did not recognize visual resources as a program requiring specific management action. Is the Cisco to U.S. 191 corridor being eliminated because of visual concerns?	No corridor is proposed for elimination for either visual or sensitive species reasons. See response to comment 12-2. Chapter 3.19, pg. 167 of the DRMP/EIS refers to the formulation of visual resource management for the 1985 Grand RMP. In that effort, visual resource inventory classes were prepared for the Environmental Impact Statement , but visual resources were not placed in a management class as part of that 1985 RMP.
PacficCorp	12	12	PacificCorp recommends that the EIS and final RMP include siting criteria for facilities on existing and future communication sites.	Future communication sites may be located anywhere outside an exclusion area, although efforts would be undertaken to locate outside avoidance areas. Future communication sites would be addressed during the site-specific NEPA analysis undertaken for the future facility.
PacficCorp	12	13	Pacific Corp supports the less restrictive and wider utility corridor in Alternative D and requests that the BLM incorporate the utility corridors in Alternative D into the Preferred Alternative.	The commentor's preference that the utility corridors be incorporated as described in Alterantive D is noted. The State Director will make a decision based on consideration of public comments, analysis of the impacts, resolution of the issues, purpose and need for

				the plan, and the planning criteria. The BLM can choose management actions from within the range of alternatives.
Samson	201	1	The Reasonable Foreseeable Development (RFD) Scenario for oil and natural gas development within the planning area is unreasonably low, particularly for development in the Lisbon Valley, Eastern Paradox, and Greater Cisco Areas and does not consider an alternative to no surface occupancy in environmentally sensitive areas. See Moab DRMP/EIS, map 3-16. The BLM determined that the vast majority of the Moab RA has high potential for oil and gas. See DRMP/EIS, Map 3-2, Mineral Potential Report, pgs. 51-52, Maps 6a, 6b, 6c, and 6d. Nonetheless, the BLM's RFD Scenario appears to be based on past permitting rather than potential development given the geologic conditions as required by BLM Washington Office Instruction Memorandum 2004-089 (Jan. 16, 2004). See also BLM Land Use Planning Handbook H-1624-1 Planning for Fluid Minerals (Chapter III, B.)(Release 1-1583, 5/7/06), as modified. The Preferred Alternative, Alternative C, only projects 432 wells in the next 15 years. See Moab DRMP/EIS, pg. 4-91. Rather than relying on outdated USGS data, the RFD should be based on 3-D seismic activity in the area and the current level of APD activity. Recent APD filings suggest the fifteen-year RFD should be far higher than the level anticipated by BLM.	See response to comment 214-1 and 214-28.
Samson	201	2	Operators are also concerned about the BLM's proposal to manage so-called "non- Wilderness Study Area (WSA) lands with wilderness characteristics" to maintain wilderness values. There is no justification and no mandate in the Federal Land Policy and Management Act of 1976 (FLPMA), and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the wilderness evaluation process required by Section 603 of FLPMA was complete in the early 1990's, the BLM and the	See response to comment 214-2.

			Department of the Interior were not required to conduct further wilderness inventories. 43 U.S.C. § 1782; State of Utah v. Norton, 2006 WL 2711798, Civ No. 96-CV-0870, *2, *8 (Sept. 20, 2006). The question of which lands should be included in the National Wilderness Preservation System is now reserved solely to Congress. State of Utah v. Norton, at *8. The BLM has not explained the need for managing additional lands for wilderness qualities.	
Samson	201	3	In order to avoid potential litigation from those opposed to the use of categorical exclusions, and in order to comply with Congress' unequivocal directive, the BLM must incorporate the Energy Policy Act of 2005 categorical exclusions into the Moab RMP and develop an overall management goal encouraging their use.	See response to comment 214-5.
Samson	201	4	43 U.S.C. ‘ 1702(j) (2006). If Alternative B is selected, the BLM would make a total of 71,444 acres unavailable to oil and gas leasing and, under Alternative C a total of 370,250 acres unavailable for oil and gas leasing. Even under the "development alternative" 350,219 acres would be closed to oil and gas leasing. Because withholding such large areas of land from oil and gas leasing constitutes a withdrawal, the Department of the Interior will be required to comply with the procedural provisions of Section 204 FLPMA. 43 U.S.C. § 1714 (2006). FLPMA requires the Secretary of the Interior to comply with certain procedural mandates prior to closing an area of 5,000 acres or more to mineral development. Id. Among the other requirements imposed on the Department of the Interior is the requirement for the Secretary of the Interior, as compared to the Director of the BLM or a State Director, to make all withdrawals of federal lands. 43 U.S.C. § 1714(a) (2006). Only the Secretary-or a designee in the Secretary's office appointed by the President and confirmed by the Senate-is authorized to make withdrawals under	See response to comment 214-7.

			FLPMA. The Secretary is also required to provide notice of the proposed withdrawal in the Federal Register and conduct hearings regarding the withdrawal. 43 U.S.C. § 1714(b)(l) and (h) (2006). Finally, the Secretary is required to notify both houses of Congress of the proposed withdrawal. See 43 C.F.R. § 1610.6 (2006). The notice must include information: (1) regarding the proposed use of the land; (2) an inventory and evaluation of the current natural resource uses and value of the land and adjacent public and private land which-may be affected; (3) an identification of present users and how they will be affected; (4) an analysis of the manner in which the existing and potential uses are incompatible with or in conflict with the proposed uses; (5) an analysis of the manner in which such lands will be used in relation to the specific requirements for the proposed uses; (6) a statement as to whether suitable alternative sites are available; (7) a statement of the consultation which has been or will be had with other federal, regional, state, and local government bodies; (8) a statement regarding the potential effects of the withdrawal on the state, local, and regional economy; (9) a statement of the length of time needed for the withdrawal; (10) the time and place of the hearings regarding the withdrawal; (11) the place where the records of the withdrawal can be examined; and (12) a report prepared by a qualified mining engineer, engineering geologist, or geologist, which shall include information on mineral deposits, mineral production, existing mining claims, and an evaluation of future mineral potential. 43 U.S.C. § 1714(c)(2) (2006). To date, the BLM and Department of the Interior have not complied with these requirements. Additionally, FLPMA requires the Secretary of the interior to comply with specified procedural requirements before making a management decision that totally eliminates a principal or major use of the	

			public lands for a period of two or more years on a tract of land more than 100,000 acres in size. 43 U.S.C. § 1712(e). Oil and gas development is defined as a principal or major use of the public lands. 43 C.F.R. § 1702(1). The BLM would close well over 300,000 acres to oil and gas leasing under Alternatives B, C, and D, yet BLM has not complied with the clear requirements of FLPMA. BLM must notify Congress of its intent to close significant areas to future oil and gas development prior to finalizing the Moab RMP.	
Samson	201	5	Section 1.4.5 -Energy Policy and Conservation Act (EPCA) The BLM indicates in Section 1.4.5 of the Moab DRMP/EIS that the agency integrated the general principles from the EPCA Study into the RMP revision. See Moab DRMP/EIS, pg. 1-15. The BLM should also carefully review the results and analysis contained in the Scientific Inventory of Onshore Federal Land's Oil and Gas Resources and the Extent and Nature of Restrictions or Impediments to Their Development (2006) (EPCA II) prepared in compliance with § 604 of the Energy Act of 2000, Pub. L. No. 106-469, and § 364 of the Energy Policy Act of 2005, Pub. L. No. 109-58. The EPCA II study demonstrates the significant negative impacts that stipulations have upon oil and gas leasing and development. The EPCA II study demonstrates that approximately 38.5% of federal lands containing natural gas resources within the Paradox/San Juan Basin are available with Standard Lease Terms and that over 50% of the federal lands are encumbered with restrictions to development. Se EPCA II, pg. 96. However, approximately 49% of the federal lands within the Paradox/San Juan Basin are unavailable for leasing. Id. at 89, 96. That means that 23% (96 MMbbls) of the federal oil and 7% (2.0 TCF) of federal natural gas would be unrecoverable. Id. at 89.	See response to comment 214-9

			The BLM should carefully consider the impacts more restrictive stipulations will have upon oil and gas development in the Moab RA and, as required by the Energy Policy Act of 2005, ensure that stipulations imposed are only as restrictive as necessary. See Energy Policy Act of 2005, Pub. L. No. 109-58, § 363(b)(3), 119 Stat. 594, 723 (2005).	
Samson	201	6	Section 1.4.7 -Memorandum of Understanding with Forest Service The BLM incorrectly references a 1991 Memorandum of Understanding between the BLM and the United States Department of Agriculture, Forest Service (Forest Service) establishing joint BLM and Forest Service procedures for managing oil and gas leasing and operational activities in the Moab DRMP/EIS. See Moab DRMP/EIS, pg. 1-16. Section 363 of the Energy Policy Act of 2005 directed the BLM and Forest Service to develop a new Memorandum of Understanding regarding oil and gas leasing and operational activities on lands administered by the BLM and Forest Service. Energy Policy Act of 2005, Pub. L. No. 109-58, § 363, 119 Stat. 594, 722-23 (2005). Congress specifically directed the BLM and Forest Service to develop administrative procedures and timeline to ensure the timely processing of oil and gas lease applications, surface use plans of operations, and applications for permits to drill. Id. The Energy Policy Act of 2005 further required the BLM and Forest Service to ensure that lease stipulations are applied consistently, coordinated between the agencies, and only as restrictive as necessary to protect the resource for which the stipulations are applied. Id. (emphasis added). The BLM and the Forest Service issued the Memorandum of Understanding required by Section 363 of the Energy Policy Act in April of 2006. See BLM MOU WO300-2006-07. The new Memorandum of Understanding	See response to comment 202-7.

			clearly and unequivocally "supersedes the BLM and Forest Service Interagency Agreements on leasing and operations dated November 1991." Id. The BLM must correct this inference in the Final EIS for the Moab RMP and ensure that the Moab Field Office reviews and complies with the 2006 Memorandum of Understanding when developing and adopting the Moab RMP, and when permitting or approving future oil and gas leasing or development operations within the Moab RA. The 1991 memorandum has no legal impact or effect at this time. In particular, the BLM must ensure that the stipulations attached to any future leases are the least restrictive necessary to protect the particular resource values in question. See Energy Policy Act of 2005, Pub. L. No. 109-58, § 363(b)(3)(C), 119 Stat. 594, 722-23 (2005); BLM MOU WO300-2006-07, pg. 2 of 16.	
Samson	201	7	On page 2-7 of the Moab DRMP/EIS the BLM proposes the following management action common to all alternatives: "Manage all BLM-authorized activities to maintain air quality within the thresholds established by the State of Utah Ambient Air Quality Standards and to ensure that those activities continue to keep the area as attainment, meet prevention of significant deterioration (PSD) Class II standards, and protect the Class I air shed of the National Parks (e.g., Arches and Canyonlands National Parks." See Moab DRMP/EIS, pg. 2-7. The BLM must significantly revise this proposed management action because it violates the Clean Air Act (CAA) and confuses the BLM's authority over air quality and air emissions. The BLM does not have any direct authority over air quality or air emissions under the Clean Air Act. 42 U.S.C. §§ 7401 et seq. Under the express terns of the CAA, the Environmental Protection Agency (EPA) has the authority to regulate air emissions. In Utah, the EPA has its authority to the State of Utah, Department of	See response to comment 214-10.

			Environmental Quality (UDEQ). The BLM has not, and under the CAA cannot, be delegated such authority. ….The BLM must eliminate or revise the proposed management action.	
Samson	201	8	The BLM's authority to manage potential visibility impacts is similarly limited by existing federal law. Under the CAA, a federal land manager such as the BLM only has the authority to evaluate and consider whether a "proposed major emitting facility will have an adverse impact" on visibility within designated Class I areas. 42 U.S.C. § 7475(d)(2)(B) (2006). Even then, the final decision whether to approve the siting of the facility rests with the state and EPA, not the federal land manager. With respect to oil and gas development, BLM's role is even more limited because oil and gas operations do not meet the definition of a major emitting facility. Further, under the CAA, the regulation of potential impacts to visibility and authority over air quality in general, rests with the UDEQ. 42 U.S.C. § 7407(a) (2006). The goal of preventing impairment of visibility in Class I areas will be achieved through the regional haze state implementation plans (SIPs) that are being developed. 42 U.S.C. § 7410(a)(2)(J). Although federal land managers with jurisdiction over Class I areas may participate in the development of regional haze SIPs, the BLM has no such jurisdiction in Utah. 42 U.S.C. § 7491 (2006). Accordingly, the BLM has no authority over air quality and cannot impose emissions restrictions, either directly or indirectly, on natural gas operations in Utah, particularly if the overall goal is to reduce potential visibility impacts. With these limitations in mind, the BLM must revise its air quality management goal on page 2-7 of the Moab DRMP/EIS. The BLM cannot attempt to impose air emission regulations through its normal management responsibilities. Further, even assuming the BLM had the authority to regulate air quality or emissions, the	See response to comments 214-10 and 214-11.

			management goal is poorly worded and could lead to increased litigation. Opponents to natural gas development would likely suggest the above proposed management action prevents the BLM from authorizing actions that may increase emissions within the planning area. Opponents to natural gas development have used similar language in the existing RMPs in the States of Utah and Wyoming to suggest not only that BLM has authority over air quality, but that the BLM cannot authorize actions which may impact air quality. The BLM must revise its air quality goal to state that BLM's only management goal, objective, or action will be to ensure the BLM does not interfere with the UDEQ's permitting authority. In the event the BLM unwisely retains the potentially illegal objective contained in the Moab DRMP/EIS, the BLM must include clear language in the RMP disavowing any attempt by BLM to regulate air emissions or air quality in the planning area.	
Samson	201	9	Unfortunately, the BLM has not mapped or identified the exclusion or avoidance areas under the various alternatives. Based on the acreage calculations, it appears that the ROW exclusion designation applies to lands closed to oil and gas leasing and that the ROW avoidance designation applies to lands with a no surface occupancy stipulation. See Moab DRMP/EIS pgs. 2-11 and 2-15. Because the proposed avoidance and exclusion areas are not mapped, the BLM has not provided Operators with sufficient information to analyze how such restrictions may impact its operations. BLM must provide this information in the Final EIS for the Moab RMP revision.	See response to comment 214-12.
Samson	201	10	The BLM partially recognizes that existing oil and gas leases within the Moab RA must be honored. See DRMP/EIS, pg. 2-15. However, the BLM must indicate more clearly that the revised RMP cannot modify or alter existing lease rights by developing a Goal specifically addressing existing lease rights. The BLM	See response to comment 214-14.

			more accurately recognized the nature of existing lease rights in the Draft EIS for the Pinedale Resource area in Wyoming in 2007. "Surface use and timing restrictions resulting from this RMP cannot be applied to existing leases." See Pinedale RMP Draft EIS (2007), pg. 2-8. The Draft RMP for the Pinedale Resource Area also recognized that surface use restrictions, timing limitation stipulations, and NSO stipulations, as well as the creation of areas unavailable for leasing restrictions cannot be retroactively applied to valid existing oil and gas leases. "Surface use restrictions, including timing limitation stipulations (TLS), NSO stipulations, and controlled surface use (CSU) stipulations, as well as unavailable for leasing designations, cannot be retroactively applied to valid, existing oil and gas leases or to valid, existing use authorizations (e.g., Application for Permit to Drill [APD])." See Pinedale RMP Draft EIS, pg. 4-46. The BLM cannot adjust a lessee's valid and existing rights. Congress made it clear when it enacted FLPMA that nothing therein, or in the land use plans developed thereunder, was intended to terminate, modify, or alter any valid or existing property rights. See 43 U.S.C. § 1701 note (2006). In order for the public to be fully informed, the Moab RMP should contain similar statements and guarantees.	
Samson	201	11	In the event the BLM designates the Mill Creek Canyon ACEC, the BLM must ensure that operations on adjoining state lands are not impacted. Although it appears BLM intends to either close the Mill Creek Canyon area to oil and gas leasing or impose stringent NSO stipulations, see Moab DRMP/EIS, pg. 2-36, maps 2-14-6, 2-5-6, the BLM must not allow its decisions to inhibit development on nearby State of Utah lands by denying ROWS or other means. The BLM should not close the Mill Creek Canyon area to all oil and gas leasing as it proposes under Alternative B because some development of federal minerals may be possible	See response to comment 120-10. The BLM does not propose to chose Alt B, which closes Mill Creek Canyon to oil and gas leasing.

			from adjoining state lands. The BLM must not select Alternative B and close the Mill Creek Canyon area to all oil and gas leasing.	
Samson	201	12	On page 2-30 of the Moab DRMP/EIS, the BLM states that surface-disturbing activities would be precluded within 100-year floodplains, 100m of riparian areas, public water reserves, and 100m of springs. The BLM should clarify this Management Common to All Action Alternatives slightly to indicate that road and pipeline crossings would be allowed in streams and other potential riparian habitats when approved by the BLM and Army Corp of Engineers. As currently drafted, the management action could be viewed as prohibiting all stream crossings within the planning area.	See response to comment 214-20. Appendix H, Guidance for Pipeline Crossings, is included in the DRMP/EIS so that proper pipeline placement and crossing can occur.
Samson	201	13	Soils and Watershed On page 2-32 the BLM indicates that it will not allow surface occupancy and preclude surface-disturbing activities within 100-year floodplains, 100m of riparian area, public water reserves, and 100m of springs. The BLM should clarify this Management Common to All Action Alternatives slightly to indicate that road and pipeline crossings would be allowed in streams and other potential riparian habitats when approved by the BLM and Army Corp of Engineers. The BLM also indicates under this section that it will minimize surface disturbance in areas with sensitive soils. Although the BLM mapped areas with saline soils, it has not mapped sensitive soils. See DRMP/EIS, Map 2-13. The BLM should map sensitive soils within the planning area so that the public better understands how this management action will impact use of the public lands. In particular, the BLM should disclose and analyze how oil and gas leasing and oil and gas development operations would be impacted by this management approach. Similarly, although the BLM indicates that limitations placed on "fragile soils" will adversely impact oil and gas operations, see	See response to comment 214-21.

			DRMP/EIS, pg. 4-96, the BLM does not provide any specific information on where fragile or sensitive soils may be located.	
Samson	201	14	Special Designation - National Historic Trail - Old Spanish Trail The BLM describes proposed management actions for the Old Spanish Trial on page 2-39 of the Moab DRMP/EIS. The BLM should include a map showing the location of the Old Spanish Trial so that the public and oil and gas operators such as Operators understand how the trail designation may impact future uses of the public lands, including the development of oil and gas resources.	See response to comment 214-22.
Samson	201	15	It would be inappropriate to require oil and gas lessees to "fully mitigate" impacts from oil and gas operations when -oil and gas development is a mandated and appropriate use of the public lands. See, e.g., 30 U.S.C. § 226; 43 U.S.C. § 1702(1). Congress has directed public lands to be leased for oil and gas development, the BLM cannot require operators to "fully mitigate" the potential where impacts of an activity that Congress has approved and encouraged. The management action should be eliminated.	See response to comment 214-24.
Samson	201	16	The United States Fish and Wildlife Service (USFWS) determined that the current condition of the greater sage-grouse did not warrant protection under the Endangered Species Act (ESA) in January of 2005. 70 Fed. Reg. 2244 (Jan. 12, 2005). As such, the species is not entitled to any specific protection under the ESA. The BLM must ensure it has sufficient flexibility to manage the public lands for other multiple uses in sage brush habitat, particularly oil and gas development.	See response to comment 203-40. The BLM can choose to impose stipulations for animals so that they not be listed under ESA.
Samson	201	17	The BLM's proposed management for Gunnison sage-grouse is similarly restrictive, particularly under Alternative B, which would prohibit most multiple use activities, including oil and gas development, in that vast majority of the Lisbon Valley area. See DRMPIEIS,	See response to comments 203, 40, 203-41 and 203-42. Existing leases are subject to the terms and conditions in place at the time of the lease. The BLM has chosen to impose stipulations on operations in Gunnison sage-

			pg. 2-47, Map2- 20. BLM's proposal to limit most surface occupancy on 175,727 acres of potential habitat under Alterative C, or 246,107 acres of "pre-settlement" habitat under Alternative B is unnecessary and potentially illegal. BLM cannot impose limitations inconsistent with Operators existing lease rights in the Lisbon Valley area and, therefore, would be precluded from imposing additional timing or controlled use conditions of approval on Operators operations if such limitations were inconsistent with the terms of Operators leases. Once the BLM has issued a federal oil and gas lease, a lessee has not only the right to utilize the leasehold, but the obligation to develop oil and gas resources therefrom. See 43 C.F.R. § 3101-1-2.	grouse habitat to prevent the listing of this species.
Samson	201	18	On page 2-54 the BLM indicates that it will be increasing the timing limitation for pronghorn habitat by two weeks by changing the stipulation from May 15 - June 15 to May 1 to June 15 of each year. The BLM must ensure that this change in the timing stipulation is not imposed on existing leases through COAs on individual well activities. Further, the BLM cannot adjust Operators valid and existing rights. Congress made it clear when it enacted FLPMA that nothing therein, or in the land use plans developed thereunder, was intended to terminate, modify, or alter any valid or existing property rights. See 43 U.S.C. § 1701 note (2006). Because the authority conferred in FLPMA is expressly made subject to valid existing rights, 43 U.S.C. § 1701 note, an RMP prepared pursuant to FLPMA, after lease execution and after drilling and production has commenced, is likewise subject to existing rights. See Colovado Envivonmental Coal, et al., 165 IBLA 221,228 (2005).	See response to comment 214-4.
Samson	201	19	The BLM incorrectly describes the purpose and role of the RFD Scenario on page 4-3 of the Moab DRMP/EIS. The BLM suggests that "if the projections used in this impact analysis are significantly exceeded at some time	See response to comment 214-28.

			in the future due to a continual increase in oil and gas prices, then the analysis will have to be updated again." See Moab DRMP/EIS pg. 4-3. This language incorrectly suggests that the RFD Scenario is a limitation on future oil and gas development in the Moab RA. Such a position has been rejected by the BLM nationally, and by the Secretary of the Interior through the IBLA. The RFD Scenario is a tool for NEPA compliance, not a decision in the resource management plan. In the event oil and gas development exceeds the level predicted in the Moab DRMP/EIS, the BLM will have the opportunity to prepare appropriate additional NEPA analysis analyzing the impacts of increased development through project level analysis; the BLM will not be required to revise its resource management plan. The BLM should clearly state in the Final EIS, the Record of Decision, and the actual RMP for the Moab RA confirming the nature of the RFD Scenario and the fact that the RFD Scenario is not a planning decision or limitation on the level of development that can be authorized within the Moab RA. The RFD Scenario is defined by the BLM as a "baseline scenario of activity assuming all potentially productive areas can be open under standard lease terms and conditions, except those areas designated as closed to leasing by law, regulation or executive order." BLM Instruction Memorandum 2004-089, Attachment 1-1 (January 16, 2004). The RFD is neither a Planning Decision nor the "No Action Alternative" in the NEPA document. "In the NEPA document, the RFD based on scenarios adjusted under each alternative to reflect varying levels of administrative designations, management practices, and mitigation measures." BLM Instruction Memorandum 2004-089, Attachment 1-1 (January 16, 2004). The RFD is based on review of geologic factors that control potential for oil and gas resource	

			occurrence and past and present technological factors that control the type and level of oil and gas activity. The RFD Scenario also considers petroleum engineering principles and practices and economics associated with discovering and producing oil and gas. BLM Instruction Memorandum 2004-089, Attachment 1-3 (January 16, 2004). The RFD should be based solely or primarily on permitting. The BLM should revise its RFD Scenario given the high potential for oil and gas development in the planning area. The IBLA has made clear in six separate decisions that the RFD Scenario is not a planning decision, nor is it a limit on future development. National Wildlife Fed'n, 170 IBLA 240, 249 (2006) (holding with respect to the Great Divide RMP that the RFD Scenario is not a limitation on development); Wyoming Outdoor Council, et al., 164 IBLA 84, 99 (2004) (holding with respect to the Pinedale RMP that the RFD Scenario does not establish "a point past which further exploration and development is prohibited"); Southern Utah Wilderness Alliance, 159 IBLA 220, 234 (2003) (holding that the Book Cliffs RMP did not establish a well limit); Theodore Roosevelt Conservation Partnership, et al., IBLA Doclret No. 2007-208, Order at *22 (September 5, 2007); Wyoming Outdoor Council, et al., IBLA Docket No. 2006-155, Order at *26 - 27 (June 28, 2006) (determining RFD Scenario for Pinedale RMP is not a limitation on future development); Biodiversity Conservation Alliance, et al., IBLA No. 2004-316, Order at *7 (Oct. 6, 2004) (citing Southern Utah Wilderness Alliance, 159 IBLA at 234) (holding with respect to the Great Divide RMP that the "RFD scenario cannot be considered to establish a limit on the number of oil and gas wells that can be drilled in a resource area."). As indicated by the number of decisions cited above, the purpose of the RFD Scenario continues to be a source of confusion,	

			and litigation, for some groups and individuals. In order to prevent future litigation and appeals, the BLM must include language in the Moab RMP itself describing the purpose of the RFD Scenario, and the fact that the RFD Scenario is not a planning decision or limitation on future development. Additionally, the BLM must delete or significantly revise the potentially confusing and incorrect language on page 4-3 of the Moab DRMP/EIS.	
Cabot Oil and Gas Corporation	202	1	The Reasonable Foreseeable Development (RFD) Scenario for oil and natural gas development within the planning area is unreasonably low, particularly for development in the Lisbon Valley, Eastern Paradox, and Greater Cisco Areas. The BLM determined that the vast majority of the Moab RA has high potential for oil and gas. See DRMP/EIS, Map 3-2, Mineral Potential Report, pgs. 51-52, Maps 6a, 6b, 6c, and 6d. Nonetheless, the BLM's RFD Scenario appears to be based solely on past permitting rather than potential development given the geologic conditions as required by BLM Washington Office Instruction Memorandum 2004-089 (Jan. 16, 2004). See also BLM Land Use Planning Handbook H-1624-1 Planning for Fluid Minerals (Chapter III, B.)(Release 1-1583, 5/7/06), as modified. The Preferred Alternative, Alternative C, only projects 432 wells in the next 15 years. Rather than relying on outdated USGS data, the RFD should be based on 3-D seismic activity in the area and the current level of APD activity. Recent APD filings demonstrate the RFD scenario for the Moab RA should be at least 975, based on 2006 data of 65 APDs.	See response to comment 214-1 and 214-28.
Cabot Oil and Gas Corporation	202	2	Cabot is also concerned about the BLM's proposal to manage so-called "non- Wilderness Study Area (WSA) lands with wilderness characteristics" to maintain wilderness values. There is no justification and no mandate in the Federal Land Policy and Management Act of 1976 (FLPMA), and no process requirement for engaging in an ongoing Wilderness inventory and	See response to comment 214-2.

			review. Once the wilderness evaluation process required by Section 603 of FLPMA was complete in the early 1990's, the BLM and the Department of the Interior were not required to conduct further wilderness inventories. 43 U.S.C. § 1782; State of Utah v. Norton, 2006 WL 2711798, Civ No. 96-CV-0870, *2, *8 (Sept. 20, 2006). The question of which lands should be included in the National Wilderness Preservation System is now reserved solely to Congress. Id. at *8. The BLM has not justified the need for managing additional lands for wilderness qualities.	
Cabot Oil and Gas Corporation	202	3	The BLM promulgated policies regarding the contractual rights granted in an oil and gas lease. First, the BLM's Planning Manual specifically mandates the protection of existing lease rights. "All decisions made in land use plans, and subsequent implementation decisions, will be subject to valid existing rights. This includes, but is not limited to, valid existing rights associated with oil and gas leases…" See BLM Manual 1601 – Land Use Planning, 1601.06.G (Rel. 1-166 11/22/00). BLM Instruction Memorandum 92-67 similarly states that "[t]he lease contract conveys certain rights which must be honored through its term, regardless of the age of the lease, a change in surface management conditions, or the availability of new data or information. The contract was validly entered based upon the environmental standards and information current at the time of the lease issuance." As noted in the BLM's Instruction Memorandum, which is binding upon the agency, the lease constitutes a contract between the federal government and the lessee which cannot be unilaterally altered or modified by the BLM.	See response to comment 214-4.
Cabot Oil and Gas Corporation	202	4	In order to avoid potential litigation from groups opposed to natural resources development on federal lands, and in order to comply with Congress' unequivocal directive, the BLM must incorporate the Energy Policy Act of 2005 categorical exclusions into	See response to comments 214-5 and 214-9.

			the Moab RMP and develop an overall management goal encouraging their use.	
Cabot Oil and Gas Corporation	202	5	43 U.S.C. ‘ 1702(j) (2006). If Alternative B is selected, the BLM would make a total of 71,444 acres unavailable to oil and gas leasing and, under Alternative C a total of 370,250 acres unavailable for oil and gas leasing. Even under the "development alternative" 350,219 acres would be closed to oil and gas leasing. Because producing oil and gas leasing on such large areas constitutes a withdrawal under FLPMA, the Department of the Interior will be required to comply with the procedural provisions of Section 204 FLPMA. 43 U.S.C. § 1714 (2006). FLPMA requires the Secretary of the Interior to comply with certain procedural mandates prior to closing an area of 5,000 acres or more to mineral development. Id. For example only the Secretary of the Interior, as compared to the Director of the BLM or a State Director, has the authority to make withdrawals of federal lands. 43 U.S.C. § 1714(a) (2006). The Secretary-or a designee in the Secretary's office appointed by the President and confirmed by the Senate-is authorized to make withdrawals under FLPMA. The Secretary is also required to provide notice of the proposed withdrawal in the Federal Register and conduct hearings regarding the withdrawal. 43 U.S.C. § 1714(b)(l) and (h) (2006). Finally, the Secretary is required to notify both houses of Congress of the proposed withdrawal. See 43 C.F.R. § 1610.6 (2006). The notice must include information: (1) regarding the proposed use of the land; (2) an inventory and evaluation of the current natural resource uses and value of the land and adjacent public and private land which-may be affected; (3) an identification of present users and how they will be affected; (4) an analysis of the manner in which the existing and potential uses are incompatible with or in conflict with the proposed uses; (5) an analysis of the manner in	See response to comment 214-7.

			which such lands will be used in relation to the specific requirements for the proposed uses; (6) a statement as to whether suitable alternative sites are available; (7) a statement of the consultation which has been or will be had with other federal, regional, state, and local government bodies; (8) a statement regarding the potential effects of the withdrawal on the state, local, and regional economy; (9) a statement of the length of time needed for the withdrawal; (10) the time and place of the hearings regarding the withdrawal; (11) the place where the records of the withdrawal can be examined; and (12) a report prepared by a qualified mining engineer, engineering geologist, or geologist, which shall include information on mineral deposits, mineral production, existing mining claims, and an evaluation of future mineral potential. 43 U.S.C. § 1714(c)(2) (2006). To date, the BLM and Department of the Interior has not complied with these requirements. Additionally, FLPMA requires the Secretary of the interior to comply with specified procedural requirements before making a management decision that totally eliminates a principal or major use of the public lands for a period of two or more years on a tract of land more than 100,000 acres in size. 43 U.S.C. § 1712(e). Oil and gas development is defined as a principal or major use of the public lands. 43 C.F.R. § 1702(1). The BLM would close well over 300,000 acres to oil and gas leasing under Alternatives B, C, and D, yet BLM has not complied with the clear requirements of FLPMA. BLM must notify Congress of its intent to close significant areas to future oil and gas development prior to finalizing the Moab RMP.	
Cabot Oil and Gas Corporation	202	6	Section 1.4.5 -Energy Policy and Conservation Act (EPCA) The BLM indicates in Section 1.4.5 of the Moab DRMP/EIS that the agency integrated the general	See response to comment 214-9.

			principles from the EPCA Study into the RMP revision. See Moab DRMP/EIS, pg. 1-15. The BLM should also carefully review the results and analysis contained in the Scientific Inventory of Onshore Federal Land's Oil and Gas Resources and the Extent and Nature of Restrictions or Impediments to Their Development (2006) (EPCA II) prepared in compliance with § 604 of the Energy Act of 2000, Pub. L. No. 106-469, and § 364 of the Energy Policy Act of 2005, Pub. L. No. 109-58. The EPCA II study demonstrates the significant negative impacts that stipulations have upon oil and gas leasing and development. The EPCA II study demonstrates that approximately 38.5% of federal lands containing natural gas resources within the Paradox/San Juan Basin are available with Standard Lease Terms and that over 50% of the federal lands are encumbered with restrictions to development. Se EPCA II, pg. 96. However, approximately 49% of the federal lands within the Paradox/San Juan Basin are unavailable for leasing. Id. at 89, 96. That means that 23% (96 MMbbls) of the federal oil and 7% (2.0 TCF) of federal natural gas us unrecoverable. Id. at 89. The BLM should carefully consider the impacts more restrictive stipulations will have upon oil and gas development in the Moab RA and, as required by the Energy Policy Act of 2005, ensure that stipulations imposed are only as restrictive as necessary. See Energy Policy Act of 2005, Pub. L. No. 109-58, § 363(b)(3), 119 Stat. 594, 723 (2005).	
Cabot Oil and Gas Corporation	202	7	Section 1.4.7 -Memorandum of Understanding with Forest Service The BLM improperly references a 1991 Memorandum of Understanding between the BLM and the United States Department of Agriculture, Forest Service (Forest Service) establishing joint BLM and Forest Service procedures for managing oil and gas leasing	The reference to the Memorandum of Understanding between the BLM and the Forest Service regarding oil and gas leasing has been changed in the PRMP/FEIS from 1991 to 2006.

			and operational activities in the Moab DRMP/EIS. See Moab DRMP/EIS, pg. 1-16. Section 363 of the Energy Policy Act of 2005 directed the BLM and Forest Service to develop a new Memorandum of Understanding regarding oil and gas leasing and operational activities on lands administered by the BLM and Forest Service. Energy Policy Act of 2005, Pub. L. No. 109-58, § 363, 119 Stat. 594, 722-23 (2005). Congress specifically directed the BLM and Forest Service to develop administrative procedures and timeline to ensure the timely processing of oil and gas lease applications, surface use plans of operations, and applications for permits to drill. Id. The Energy Policy Act of 2005 further required the BLM and Forest Service to ensure that lease stipulations are applied consistently, coordinated between the agencies, and only as restrictive as necessary to protect the resource for which the stipulations are applied. Id. (emphasis added). When developing the Moab RMP the BLM must ensure that any and all stipulations developed for future leasing with the Moab RA are the least restrictive possible. The BLM and the Forest Service issued the Memorandum of Understanding required by Section 363 of the Energy Policy Act in April of 2006. See BLM MOU WO300-2006-07. The new Memorandum of Understanding clearly and unequivocally "supersedes the BLM and Forest Service Interagency Agreements on leasing and operations dated November 1991." Id. The BLM must correct this inference in the Final EIS for the Moab RMP and ensure that the Moab Field Office reviews and complies with the 2006 Memorandum of Understanding when developing and adopting the Moab RMP, and when permitting or approving future oil and gas leasing or development operations within the Moab RA. The 1991 memorandum has no legal impact or effect at this time. In particular, the BLM must ensure that the stipulations	

			attached to any future leases are the least restrictive necessary to protect the particular resource values in question. See Energy Policy Act of 2005, Pub. L. No. 109-58, § 363(b)(3)(C), 119 Stat. 594, 722-23 (2005); BLM MOU WO300-2006-07, pg. 2 of 16.	
Cabot Oil and Gas Corporation	202	8	On page 2-7 of the Moab DRMP/EIS the BLM proposes the following management action common to all alternatives: "Manage all BLM-authorized activities to maintain air quality within the thresholds established by the State of Utah Ambient Air Quality Standards and to ensure that those activities continue to keep the area as attainment, meet prevention of significant deterioration (PSD) Class II standards, and protect the Class I air shed of the National Parks (e.g., Arches and Canyonlands National Parks." See Moab DRMP/EIS, pg. 2-7. The BLM must significantly revise this proposed management action because it violates the Clean Air Act (CAA) and potentially unreasonably limits the BLM's ability to effectively manage public lands. The BLM does not have any direct authority over air quality or air emissions under the Clean Air Act. 42 U.S.C. §§ 7401 et seq. Under the clear provisions of the CAA, the EPA and delegated states, such as Utah, have the authority to regulate air emissions. The Secretary of the Interior, through the Interior Board of Land Appeals (IBLA) has recognized that in states such as Wyoming and Utah, the Department of Environmental Quality, not the BLM, has the authority over air emissions.	See response to comment 214-10. The BLM recognizes that it does not have the responsibility to set air emission standards. That responsibility lies with EPA and the State of Utah. The BLM's can approve actions that meet the National Ambient Air Quality Standards as set by EPA or the State.
Cabot Oil and Gas Corporation	202	9	The BLM similarly lacks authority over potential visibility impacts. Under the CAA, the regulation of potential impacts to visibility and authority over air quality in general, rests with the UDEQ. 42 U.S.C. § 7407 (a) (2006). The goal of preventing impairment of visibility in Class I areas will be achieved through the regional haze state implementation plans (SIPs) that are being developed. 42 U.S.C. § 7410 (a)(2)(J). Although federal	See response to comment 214-10.

			land managers with jurisdiction over Class I areas may participate in the development of regional haze SIPs, the BLM has no jurisdiction in Utah. 42 U.S.C. § 7491 (2006). Under CAA, a federal land manager's authority is strictly limited to considering whether a "proposed major emitting facility will have an adverse impact" on visibility within designated Class I areas. 42 U.S.C. § 7475(d)(2)(B) (2006). Oil and gas operations do not meet the definition of a major emitting facility and, thus, federal land managers have even less authority. The BLM has no authority over air quality and cannot impose emissions restrictions, either directly or indirectly, on natural gas operations in Utah, particularly if the overall goal is to reduce potential visibility impacts. Even then, the final decision whether to approve the siting of the facility rests with the state and EPA, not the federal land manager. With respect to oil and gas development, BLM's role is even more limited because oil and gas operations do not meet the definition of a major emitting facility. Further, under the CAA, the regulation of potential impacts to visibility and authority over air quality in general, rests with the UDEQ. 42 U.S.C. § 7407(a) (2006). The goal of preventing impairment of visibility in Class I areas will be achieved through the regional haze state implementation plans (SIPs) that are being developed. 42 U.S.C. § 7410(a)(2)(J). Although federal land managers with jurisdiction over Class I areas may participate in the development of regional haze SIPs, the BLM has no such jurisdiction in Utah. 42 U.S.C. § 7491 (2006). Accordingly, the BLM has no authority over air quality and cannot impose emissions restrictions, either directly or indirectly, on natural gas operations in Utah, particularly if the overall goal is to reduce potential visibility impacts. The BLM cannot attempt to impose air emission regulations through its normal management	

			responsibilities and must revise the objective on page 207 of the Moab DRMP/EIS. Even assuming the BLM had the authority to regulate air quality or emissions, the management goal is unclear and could lead to additional challenges or litigation. Opponents to natural gas development on public lands could, and likely would suggest the above goals prevent the BLM from authorizing actions that may lead to increase emissions within the planning area. Opponents to natural gas development have used similarly phrased language in the existing RMPs in the States of Utah and Wyoming to suggest not only that BLM has authority over air quality, but that the BLM cannot authorize actions which may impact air quality. The BLM must revise its air quality goals to more accurately reflect its lack of authority over air quality. In the event the BLM unwisely retains the potentially illegal objective contained in the Moab DRMP/EIS, the BLM must include clear language in the RMP disavowing any attempt by BLM to regulate air emissions or air quality in the planning area.	
Cabot Oil and Gas Corporation	202	10	The BLM is proposing huge right-of-way (ROW) exclusion and avoidance areas to be created under all of the alternatives. See Moab DRMP/EIS, pg. 2-11. The BLM has, however, not mapped or identified the exclision or avoidance areas under the various alternatives. Given the acreage calculations, it appears that the right-of-way exclusion designation applies to lands closed to oil and gas leasing and that the avoidance designation applies to lands with a no surface occupancy stipulation. See Moab DRMP/EIS pgs. 2-11 and 2-15. Because the proposed avoidance and exclusion areas are not mapped, the BLM has not provided Cabot with sufficient information to analyze how such restrictions may impact its operations.	See response to 214-12.
Cabot Oil and Gas Corporation	202	11	The BLM insufficiently recognizes that existing oil and gas leases within the Moab RA must be honored. The revised RMP for the Moab RA cannot modify or alter	See response to comment 214-14.

			existing lease rights. The BLM should include more accurate and unequivocal statements regarding existing lease rights in the Moab RMP. For example, the BLM stated in the Draft EIS for the Pinedale RMP released earlier in 2007 that, "Surface use and timing restrictions resulting from this RMP cannot be applied to existing leases." See Pinedale RMP Draft EIS (2007), pg. 2-8. The Draft RMP for the Pinedale Resource Area also recognized that surface use restrictions, timing limitation stipulations, and NSO stipulations, as well as the creation of areas unavailable for leasing restrictions cannot be retroactively applied to valid existing oil and gas leases. "Surface use restrictions, including timing limitation stipulations (TLS), NSO stipulations, and controlled surface use (CSU) stipulations, as well as unavailable for leasing designations, cannot be retroactively applied to valid, existing oil and gas leases or to valid, existing use authorizations (e.g., Application for Permit to Drill [APD])." See Pinedale RMP Draft EIS, pg. 4-46. The BLM does not have the authority to modify a lessee's valid and existing rights. Congress made it clear when it enacted FLPMA that nothing therein, or in the land use plans developed thereunder, was intended to terminate, modify, or alter any valid or existing property rights. See 43 U.S.C. § 1701 note (2006).	
Cabot Oil and Gas Corporation	202	12	In the event the BLM designates the Mill Creek Canyon ACEC, the BLM must ensure that operations on adjoining state lands are not impacted. Although it appears BLM intends to either close the Mill Creek Canyon area to oil and gas leasing or impose stringent NSO stipulations, see Moab DRMP/EIS, pg. 2-36, maps 2-14-6, 2-5-6, the BLM must not allow its decisions to inhibit development on nearby State of Utah lands by denying ROWS or other means. The BLM should not close the Mill Creek Canyon area to all oil and gas leasing as it proposes under Alternative B because	See response to comment 120-10.

			some development of federal minerals may be possible from adjoining state lands. The BLM must not select Alternative B and close the Mill Creek Canyon area to all oil and gas leasing.	
Cabot Oil and Gas Corporation	202	13	On page 2-30 of the Moab DRMP/EIS, the BLM states that surface-disturbing activities would be precluded within 100-year floodplains, 100m of riparian areas, public water reserves, and 100m of springs. The BLM should clarify this Management Common to All Action Alternatives slightly to indicate that road and pipeline crossings would be allowed in streams and other potential riparian habitats when approved by the BLM and Army Corp of Engineers. As currently drafted, the management action could be viewed as prohibiting all stream crossings within the planning area.	See response to comment 214-20.
Cabot Oil and Gas Corporation	202	14	Soils and Watershed On page 2-32 the BLM indicate that it will allow no surface occupancy and preclude surface-disturbing activities within 100-year floodplains, 100m of riparian area, public water reserves, and 100m of springs. The BLM must redraft this requirement slightly to indicate that road and pipeline crossings would be allowed in streams and other potential riparian habitats when approved by the BLM and Army Corp of Engineers. As currently drafted, the management action could be viewed as prohibiting all stream crossings within the planning area. The BLM also indicates that it will minimize surface disturbance in areas with sensitive soils. Although the BLM mapped areas with saline soils, it has not mapped sensitive soils. See DRMP/EIS, Map 2-13. The BLM should map sensitive soils within the planning area so that the public better understands how this management action will impact use of the public lands. The BLM must also disclose and analyze how oil and gas leasing and oil and gas development operations would be impacted by this management approach.	See response to comment 214-21.

			Although the BLM indicates that limitations placed on "fragile soils" will adversely impact oil and gas operations, see DRMP/EIS, pg. 4-96, the BLM does not provide any specific information on where fragile or sensitive soils may be located.	
Cabot Oil and Gas Corporation	202	15	Special Designation - National Historic Trail - Old Spanish Trail The BLM describes proposed management actions for the Old Spanish Trial on page 2-39 of the Moab DRMP/EIS. The BLM should include a map showing the location of the Old Spanish Trial so that the public and oil and gas operators such as Cabot understand how the trail designation may impact future uses of the public lands, including the development of oil and gas resources.Special Designation - National Historic Trail - Old Spanish Trail The BLM describes proposed management actions for the Old Spanish Trial on page 2-39 of the Moab DRMP/EIS. The BLM should include a map showing the location of the Old Spanish Trial so that the public and oil and gas operators such as Cabot understand how the trail designation may impact future uses of the public lands, including the development of oil and gas resources.	See response to comment 214-22.
Cabot Oil and Gas Corporation	202	16	It would be inappropriate to require oil and gas lessees to "fully mitigate" impacts from oil and gas operations when oil and gas development is a mandated and appropriate use of the public lands. See, e.g., 30 U.S.C. § 226; 43 U.S.C. § 1702(1). The management action should be eliminated or, at the very least, redrafted as follows: “Reasonably mitigate unavoidable habitat losses for special status species when such losses are anticipated to have a direct, measurable impact on sensitive species.”	See response to comment 214-24.
Cabot Oil and Gas Corporation	202	17	The BLM’s proposed management for Gunnison sage-grouse is similarly unduly restrictive, particularly under Alternative B, which would prohibit most multiple use	See response to comments 203-40, 203-41, & 203-42.

			activities, including oil and gas development, in that vast majority of the Lisbon Valley area. See DRMPIEIS, pg. 2-47, Map 2-20. BLM's proposal to limit most surface occupancy on 175,727 acres of potential habitat under Alterative C, or 246,107 acres of "pre-settlement" habitat under Alternative B is unwise, unnecessary, and potentially illegal. BLM cannot impose limitations inconsistent with Cabot's existing lease rights in the Lisbon Valley area and, therefore, would be precluded from imposing additional timing or controlled use conditions of approval on Cabot's operations if such limitations were inconsistent with the terms of Cabot's leases. Once the BLM has issued a federal oil and gas lease, a lessee has not only the right to utilize the leasehold, but the obligation to develop oil and gas resources therefrom. See 43 C.F.R. § 3101-1-2.	
Green River Ranches	448	1	Our comments are directed to Appendix D, Lands Identified for Disposal in Revised Moab RMP, specifically lands in the Green River area. The lands currently identified for disposal in the draft RMP in the Green River area would be of benefit to the Green River community, as well as improving the manageability for the BLM. We believe there are additional lands in that area that could be considered for disposal which would also benefit the community and help the BLM in its mission to manage the public lands. FLPMA states that the BLM may sell public lands that meet one or more of three criteria as defined in the Act. The lands on the attached list would fall under criteria (2) and (3) in FLPMA. Criteria (2) states, Disposal of such tract shall service important public objectives, including but not limited to, expansion of communities and economic development, which cannot be achieved and prudently or feasibly on lands other than public	Section 102(a) of FLPMA states, "The Congress declares that it is the policy of the United States that – (1) the public lands be retained in Federal ownership, unless as a result of the land use planning procedure provided for in this Act, it is determined that disposal of a particular parcel will serve the national interest." In the draft RMP, BLM identified approximately 9,500 acres of public lands in the Green River area that are isolated tracts (surrounded by private and State Lands) and would meet the criteria for community expansion of the City of Green River. Green River Ranches, LLC has suggested for disposal approximately 32 sections of additional public land that are not isolated tracts and are not difficult or uneconomic for BLM to manage as part of the public lands. It would not be in the national interest for BLM to dispose of these additional lands and they will not be added to the lands identified for disposal in the RMP.

			lands and which outweigh other public objectives and values, including, but not limited to, recreation and scenic values, which would be served by maintaining such tract in federal ownership. Criteria (3) states, Such tract, because of its location or other characteristics is difficult and uneconomic to manage as part of the public lands and is not suitable for management by another Federal department or agency. Some of the lands on the list are isolated from any large blocks of public land would appear to be difficult and uneconomic to manage by the BLM. The other tracts, even though not isolated, would appear to be good disposal lands because they are adjacent to other private and state lands and could be developed in order to expand the community of Green River. In looking through the RMP it appears there are no overriding reasons to keep these lands in public ownership. We could find no reference to recreation or other values that would preclude their disposal. The configuration of the selected lands on the attached list would in our minds make a more manageable boundary for the BLM and private landowners. The selected lands would be critical to development of agriculture in order to perfect water rights allocated from the Green River. The use of allocated water for agricultural purposes could not occur except on the identified public lands. The proposed boundary, for the most part, closely conforms to the topographic changes in the public land to the north and east of the private lands in the area. The flats could be developed and the steeper, rougher country would remain in public ownership. [See attached list of lands for disposal.]	
Cabot Oil and Gas Corporation	202	18	On page 2-54 the BLM indicates that it will be increasing the timing limitation for pronghorn habitat by two weeks by changing the stipulation from May 15 - June 15 to May 1 to June 15 of each year. The BLM	See response to comment 214-4.

			must ensure that this change in the timing stipulation is not imposed on existing leases through COAs on individual well activities. The BLM cannot adjust Cabot's valid and existing rights. Congress made it clear when it enacted FLPMA that nothing therein, or in the land use plans developed thereunder, was intended to terminate, modify, or alter any valid or existing property rights. See 43 U.S.C. § 1701 note (2006). Because the authority conferred in FLPMA is expressly made subject to valid existing rights, 43 U.S.C. § 1701 note, an RMP prepared pursuant to FLPMA, after lease execution and after drilling and production has commenced, is likewise subject to existing rights. See Colorado Environmental Coal, et al., 165 IBLA 221,228 (2005).	
Cabot Oil and Gas Corporation	202	19	The BLM incorrectly describes the purpose and role of the RFD Scenario on page 4-3 of the Moab DRMP/EIS. The BLM suggests that "if the projections used in this impact analysis are significantly exceeded at some time in the future due to a continual increase in oil and gas prices, then the analysis will have to be updated again." See Moab DRMP/EIS pg. 4-3. This language incorrectly suggests that the RFD Scenario is a limitation on future oil and gas development in the Moab RA. Such a position has been rejected by the BLM nationally, and by the Secretary of the Interior through the IBLA. The RFD Scenario is a tool for NEPA compliance, not a decision in the resource management plan. In the event oil and gas development exceeds the level predicted in the Moab DRMP/EIS, the BLM will have the opportunity to prepare appropriate additional NEPA analysis analyzing the impacts of increased development. The BLM will not be required to revise its resource management plan simply because additional development is authorized; project level NEPA analysis will provide the necessary analysis of potential impacts from increased oil and gas development.	See response to comment 214-1,

			The BLM should include specific information in the Final EIS, the Record of Decision, and the actual RMP for the Moab RA confirming the nature of the RFD Scenario and the fact that the RFD Scenario is not a planning decision or limitation on the level of development that can be authorized within the Moab RA. The RFD Scenario is defined by the BLM as a "baseline scenario of activity assuming all potentially productive areas can be open under standard lease terms and conditions, except those areas designated as closed to leasing by law, regulation or executive order." BLM Instruction Memorandum 2004-089, Attachment 1-1 (January 16, 2004). The RFD is neither a Planning Decision nor the "No Action Alternative" in the NEPA document. "In the NEPA document, the RFD based on scenarios adjusted under each alternative to reflect varying levels of administrative designations, management practices, and mitigation measures." BLM Instruction Memorandum 2004-089, Attachment 1-1 (January 16, 2004). The RFD is based on review of geologic factors that control potential for oil and gas resource occurrence and past and present technological factors that control the type and level of oil and gas activity. The RFD Scenario also considers petroleum engineering principles and practices and economics associated with discovering and producing oil and gas. BLM Instruction Memorandum 2004-089, Attachment 1-3 (January 16, 2004). The IBLA has made clear in six separate decisions that the RFD Scenario is not a planning decision, nor is it a limit on future development. National Wildlife Fed'n, 170 IBLA 240, 249 (2006) (holding with respect to the Great Divide RMP that the RFD Scenario is not a limitation on development); Wyoming Outdoor Council, et al., 164 IBLA 84, 99 (2004) (holding with respect to the Pinedale RMP that the RFD Scenario does not establish "a point past which further exploration and development is	

			prohibited"); Southern Utah Wilderness Alliance, 159 IBLA 220, 234 (2003) (holding that the Book Cliffs RMP did not establish a well limit); Theodore Roosevelt Conservation Partnership, et al., IBLA Doclret No. 2007-208, Order at *22 (September 5, 2007); Wyoming Outdoor Council, et al., IBLA Docket No. 2006-155, Order at *26 - 27 (June 28, 2006) (determining RFD Scenario for Pinedale RMP is not a limitation on future development); Biodiversity Conservation Alliance, et al., IBLA No. 2004-316, Order at *7 (Oct. 6, 2004) (citing Southern Utah Wilderness Alliance, 159 IBLA at 234) (holding with respect to the Great Divide RMP that the "RFD scenario cannot be considered to establish a limit on the number of oil and gas wells that can be drilled in a resource area."). As indicated by the number of decisions cited above, the purpose of the RFD Scenario continues to be a source of confusion, and litigation, for some groups and individuals. In order to prevent future litigation and appeals, the BLM must include language in the Moab RMP itself describing the purpose of the RFD Scenario, and the fact that the RFD Scenario is not a planning decision or limitation on future development. Additionally, the BLM must delete or significantly revise the potentially confusing and incorrect language on page 4-3 of the Moab DRMP/EIS.	
Questar Exploration and Production Company	210	1	Questar has become increasingly concerned recently with attempts made via the NEPA process to impose new restrictions on existing legal rights, e.g., leases, rights-of-way, previous Records of Decision, etc. Questar regards this as a serious legal issue and is pleased to note that the Moab DRMP/EIS recognizes that valid existing rights are not subject to new Special Designations, Areas of Critical Environmental Concern (ACECs), wilderness characteristics, wild and scenic rivers, etc. Recommendation: FEIS should continue recognition of valid existing rights.	Valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decision are subject to valid existing rights. The BLM will work with and subject to the agreement of holders of valid existing rights to modify proposed actions or activities to reduce the effect of the actions or activities on resource values and uses. These modifications may be necessary to maintain the choice of alternatives being considered

				during land use plan development and implementation, and may include appropriate stipulations, relocations, redesigns, or delay of proposed actions.
Questar Exploration and Production Company	210	2	The DRMP/EIS contains many restrictions on oil and gas development. Questar finds the following restrictions in the Preferred Alternative to be excessive and in conflict with the Energy Policy Conservation Act of 2000 and Executive Order 13211 which will require identification of and efforts to eliminate impediments to natural gas and oil development: -Lands open to oil and gas leasing under standards stipulations – 59% decrease -Lands with Controlled Surface Use (CSU) and timing limitations – 107% increase -Lands designated No Surface Occupancy (NSO) – 459% increase -NSO imposed on private surface overlying federal minerals The overlapping surface stipulations identified in Appendix C will result in severe and unacceptable adverse impacts on the ability of the oil and gas industry to develop the mineral resource within the Moab Field Office planning area. Recommendation: BLM must ensure that its decisions comply with the Energy Policy Act (EPA 2005), (Energy Policy and Conservation Act (EPCA 2000), the National Energy Policy (NEP), and Executive Order 13212, (66 Fed Reg 28357 May 18, 2001) and reduce rather than increase impediments to federal oil and gas leasing. Under FLPMA, BLM is required to manage public lands under the principles of multiple use and sustained yield to meet the needs of present and future generations. 43 USC § 1701 (a)(7), (8) & (12); 43 USC § 1732(a) & (b); 43 CFR § 1610.5-3. FLPMA identifies “mineral exploration and production” as one of the “principle or major uses” of public lands. See 43 USC § 1702(1). The removal of expansive acreage from leasing and	In accordance with the Energy Conservation Policy Act, the restrictions on oil and gas leasing developed in the DRMP/EIS for the preferred alternative (Alt C) are the least restrictive stipulations necessary to protect the resources under consideration. The RFD indicates that the restrictions in Alt C results in reducing the number of wells from 451 in Alt A to 432 to in Alt C. This is a reduction of 19 wells representing a 4% reduction in development between the two alternatives. See Table 4.2 of the DRMP/EIS (on pg. 4-5) for a summary of wells foregone due to restrictions on oil and gas leasing by alternative. Nineteen wells (out of a total of 451) does not represent an unreasonable restriction on oil and gas operations. The impacts of each of the restrictions on oil and gas development are detailed in Chapter 4 of the DRMP/EIS.

			development in the DRMP/EIS does not comply with BLM objectives.	
Questar Exploration and Production Company	210	3	Right-of-way Exclusion and Avoidance Areas Analysis: The DRMP/EIS Preferred Alternative (Alternative C) designates 370,250 acres as right-of-way (ROW) exclusion and avoidance areas. This restriction of surface access will negatively impact the ability of oil and gas operators to access mineral leases and transport their product to market which, in turn, negatively impacts the local, state, and national economies. The additional restrictions contemplated in the DRMP/EIS are not adequately analyzed in terms of EPA 2005, EPCA 2000, NEP, and Executive Order 13212 and are unnecessarily applied to energy development. The Moab Field Office is primarily comprised of federal land. Management decisions made on those federal lands will not only affect energy development but will also directly impact the ability of state and private landowners to develop their land. The DRMP/EIS should fully analyze and disclose the impacts to state and private landowners if access is denied to their properties due to right-of-way exclusion and avoidance restrictions. Recommendation: Thoroughly analyze and disclose the impacts of the ROW exclusion and avoidance areas on access to valid existing legal rights and state and private lands. Ensure that the RMP provides necessary access.	See response to comments 214-12, 214-13, and 214-14.
Questar Exploration and Production Company	210	4	Areas of Critical Environmental Concern. New ACECs are proposed under each of the alternatives; however, it is unclear how the BLM determined that the proposed ACECs met the “importance and relevance” criteria. The BLM has not demonstrated that existing management practices and designation do not adequately protect the resource values of concern and that an ACEC is necessary. BLM provides no	Alt C proposes to manage 5 areas totalling 63,000 acres as ACECs. Information has been added to Appendix I which details the threats to the ACECs and the rationale for designating or not designating them. See also response to comments 203-8, 203-9 and 203-10.

			justification for fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, or threatened criteria have been met. The information and data used by the BLM to make these determinations should be fully disclosed to the public as required by NEPA and BLM policy. Recommendation: FEIS should disclose the information upon which the proposed ACECs were determined to meet the “importance and relevance” criteria. Eliminate the following proposed ACECs from further consideration based on failure to demonstrate that additional protections are necessary and/or that they meet the importance and relevance criteria: Behind the Rocks Bookcliffs Cisco White-tailed Prairie Dog Complex Colorado River Corridor Labyrinth Canyon Upper Courthouse Westwater Canyon White Wash Wilson Arch	
Questar Exploration and Production Company	210	5	Twelve of the 14 ACECs that are being considered for designation have existing oil and gas leases within them. Though these leases will remain valid until expiration, the ACEC designation limits the potential for future development within these prospective areas. The DRMP/EIS should note that many of the resource values that are meant to be protected by the proposed ACECs are already protected through management prescriptions that are applied to the leases and/or APDs. ACEC designation is unnecessary when other designations are adequate to protect a resource or value. FLPMA states that the least restrictive management technique to protect a resource should be applied. Since many of the resources identified in the proposed ACECs are already protected by current	See response to comments 203-8, 203-9 and 203-10, 203-11, 203-12, 203-13 and 203-14. For a discussion of valid existing rights, see response to comment 214-14. Alt. C designates 5 of the proposed ACECs, totalling 63,000 acres.

			management practices or existing designations, the new ACEC designations would disregard FLPMA.	
Questar Exploration and Production Company	210	6	Non-Wilderness Study Area (WSA) Lands with Wilderness Characteristics. The DRMP/EIS proposes 33 non-WSA lands with wilderness characteristics within the Moab planning area. The Preferred Alternative proposes to manage 47,761 acres to preserve wilderness characteristics. It appears that many of these areas do not meet the criteria for wilderness as described in the DRMP/EIS. Human impacts, primarily consisting of oil and gas development, are evident throughout the proposed areas. IPAMS has submitted information depicting existing human activity within the proposals for wilderness characteristics protection should preclude such a designation. It is interesting to note that BLM's consideration of these as wilderness characteristics areas demonstrates that energy development is temporary and that reclaimed energy development sites can be considered to possess wilderness characteristics. Recommendation: The basis for wilderness-like protections seems tenuous. BLM must disclose the information used to determine that these lands meet the wilderness criteria and how the boundaries were designated. Management of non-WSA lands should continue current practices without additional restrictions to preserve "wilderness characteristics." The document should acknowledge that impacts of energy development are temporary and reclamation technology has progressed to a point that the footprint is imperceptible in later years.	See response to comments 203-5, 203-6 and 203-7.
Questar Exploration and Production Company	210	7	The DRMP/EIS should clearly state that Best Management Practices can only be required or applied when both economic and technical feasibility criteria are met. The DRMP/EIS should also acknowledge that many operators work with the BLM in the permitting and	See response to comment 215-1.

			planning process to develop new BMPs or modify existing BMPs to make them meet the feasibility criteria. Recommendation: Clarify that BMPs are only required when they are both technically and economically feasible.	
Questar Exploration and Production Company	210	8	Reasonably Foreseeable Development. The Reasonably Foreseeable Development (RFD) analysis severely underestimates the potential oil and gas development within the planning area. The Preferred Alternative projects 432 wells in the next 15 years despite the fact that 2006 APD activity alone suggests a figure nearly double that. Instruction Memorandum 2004-089 requires that BLM use the best available information that data at the time of the RFD study. The BLM does not disclose the methodology or information that was used in developing the RFD, nor whether input from the oil and gas industry was solicited, but it appears that recent data may contradict some of the assumptions that went into it. Recent advances in technology, including 3-D seismic surveys, coupled with higher commodity prices would indicate a higher RFD would be more accurate. Recommendation: The predicted magnitude of the energy resource and the resulting number of wells that could be drilled should be reevaluated based on the best available information and data, taking into account new technology and increased gas prices. Information should be solicited from the oil and gas industry to aid in the evaluation.	See response to comments 203-15 and 214-1.
Questar Exploration and Production Company	210	9	The socio-economics analysis does not adequately discuss the role of the planning area in contributing to the nation's natural gas supply. The full positive impact of mineral development in the planning area was not considered, nor was the negative impact that will result from imposing stringent restrictions on energy development. The Preferred Alternative closes nearly 60% of the lands currently open to leasing under	See response to comments 203-25, 203-26, 203-27, 203-28, 203-29, 203-30, 203-31 and 203-32.

			standard stipulations and the amount of land designated NSO increases by an amazing 459%! Added to that are the right-of-way exclusion and avoidance areas prescribed by the document which severely limit operator's abilities to access and develop leases and to transport energy products to market. These actions will result in significantly less benefit to the local communities in terms of employment and economy, as well as to the state and the nation in terms of available energy, and cannot justifiably be characterized as only slightly impacting socio-economics.	
Questar Exploration and Production Company	210	10	Because the oil and gas potential has been severely underestimated in this document, it is likely that the economies of Grand and San Juan counties would be severely impacted. Section 3.13.1.6.7 discusses the contribution of tourism to the Grand County economy, but does not reference the energy industry's contribution. The DRMP/EIS acknowledges that tourism-related revenues have leveled off in Grand County. Because the document also underestimates the Reasonably Foreseeable Development (RFD), the public is not being provided adequate information on the actual impacts to local communities.	See response to comments 203-32, 203-33, 203-34 and 203-35.
Questar Exploration and Production Company	210	11	Questar believes it is important that the DRMP/EIS provide an accurate RFD analysis and fully consider the economic benefits oil and gas activities rather than simply seeking to put huge areas off-limits to responsible energy development. Although Questar realizes that there is usually a lag time between the time of the RFD is prepared and the final Record of Decision, we have recently seen several Draft RMPs that undervalue the energy potential. This is not in the spirit of NEPA and does a disservice to the local communities by underestimating the economic benefits of energy development. BLM should correct this deficiency in the DRMP/EIS. Questar would be happy to	See response to comments 214-1 and 203-15, as well as to the socioeconomic comments 203-25 through 203-35.

			provide BLM with its assessment of those economic impacts if that would be helpful. The socio-economic analysis should more accurately depict the negative socio-economic impacts of the myriad of additional restrictions that the DRMP/EIS would apply to energy development, as well as the positive economic impacts associated with tax revenues, increased employment opportunities, and increased national energy supply from the potential energy development within the Moab Field Office.	
Questar Exploration and Production Company	210	12	The DRMP/EIS uses a grossly overstated average of 15 acres per well surface disturbance associated with oil and gas exploration. Using a normal well pad size of 3 acres, this would mean that the road and pipeline associated with teach well would disturb 12 acres, or approximately 2.5 miles for a 40' easement. This is unrealistic. A more realistic figure of 5 to 7 total acres disturbance would be consistent with other recently published BLM RMPs. An average of 7 acres, allowing 4 acres for the road and pipeline (approximately ½ mile) should be used for the DRMP/EIS. It also important to note that the pipeline disturbance is minimal and temporary. After pipeline construction, the easement would revert to the standard 24' roadway resulting in an immediate reclamation of approximately one acre. The DRMP/EIS also assumes only 1500 acres would be reclaimed over the 15-year life of the RMP and only wells drilled in the first five years would be successfully reclaimed within the life of the plan. This assumption is pessimistic and does not take into account most operators' standard practice of reclaiming a well location back to producing size immediately upon putting the well on production. Recommendation: Use a 5 to 7 acre average per well location for surface disturbance and a 50% interim reclamation assumption per well. Adjust Table 4.3, Summary of Total Predicted Surface Disturbance for	See response to comment 203-28.

			Mineral Development Activities on page 4-7 to reflect this.	
Questar Exploration and Production Company	210	13	Greater and Gunnison Sage-grouse. The conditional surface use (CSU) and no surface occupancy (NSO) buffer expansion to a 0.5 mile radius surrounding Greater Sage-grouse leks and a 0.6 mile radius surrounding Gunnison Sage-grouse for nesting and brood rearing is excessively restrictive and contradicts existing, well established protocol found in recent BLM RMP and EIS decisions and the science upon which those decisions are based (Wallestad and Pyrah 1974, Braun et al. 1977). In areas where relatively higher levels of development occur, monitoring efforts indicate increasing or stable sage-grouse populations. For example, within Questar's Pinedale Anticline Project Area in Southwestern Wyoming, which has seen considerable oil and gas development since 2000, spring 2006 male grouse numbers on the 31 agency-monitored leks were the highest on record since accelerated development began in 2000 (1,559 birds in spring 2000 versus 1,873 birds in spring 2006); relatively consistent monitoring protocol were applied in all years. A 0.25-mile active lek No Surface Occupancy (NSO) buffer and a 2.0-mile CSU seasonal avoidance area are generally applied on the Pinedale Anticline. Furthermore, only 8 of the 31 leks are considered to have declining trends while 7 leks appear to be increasing in abundance (2006 Wildlife Studies, Pinedale Anticline Project by TRC Mariah Associates, Inc. 2007). According to a study by R.C. Kaiser, (2006, Recruitment by Greater Sage-grouse in Association with Natural Gas Development in Western Wyoming, Thesis, University of Wyoming, Laramie, USA), two-mile stipulations are effective in protecting nesting and brood-rearing habitat and preserving breeding behavior. Recommendation: Remove the expansion of CSU/NSO	See response to comments 203-40, 203-41 and 203-42.

			buffers and continue to use the proven adequate nesting and breeding buffer of 0.25 miles.	
Questar Exploration and Production Company	210	14	The DRMP/EIS introduces further restrictions on oil and gas with large portions of the planning area being designated as VRM Class II. The Preferred Alternative designates 365,567 acres as Class II. It is not clear from the document if the Class II restrictions overlap other restrictions; however, because oil and gas development is a temporary disturbance to the surface with temporary visual impacts, the VRM restrictions do not represent a reasonable balance between protecting vistas and developing energy resources needed by the nation.	See response to comment 203-21.
Bill Barrett Corporation	214	1	The Reasonable Foreseeable Development (RFD) Scenario for oil and natural gas development within the planning area is unreasonably low, particulary for development within Lisbon Valley, Eastern Paradox, and Greater Cisco Areas. The BLM's RFD Scenario is based soley on past permitting, not potential development based exclusively on geologic factors as required by BLM Washington Office Instruction Memorandum 2004-089.	The Reasonably Foreseeable Development scenario was prepared in August 2005 and was revised in September of 2006. The revision in 2006 was prompted by a considerable increase in oil and gas prices and on the ground activity. Up to the present time (2008) oil and gas prices have continued to climb and activity has continued to increase. However, the numbers projected in the revised RFD are still within the range of surface disturbance and the impacts analyzed in the DRMP/EIS. If the trend continues the RFD may have to be revised. The RFD was prepared in accordance with BLM Washington Office IM 2004-89. It is based on geoologic factors, past permitting, and many discussion with oil company personnel (geologists, engineers, and mangers). See response to comment 214-28.
Bill Barrett Corporation	214	2	There is no justification and no mandate in the Federal Land Policy and Management Act of 1976 (FLPMA) and no process requirement for engaging in an ongoing Wilderness Inventory and review.	The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the

				Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)).) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics."
Bill Barrett Corporation	214	3	The BLM's Land Use Planning Handbook specifies that RMPs are not normally used to make site-specific implementation decisions. The BLM must ensure that it leaves itself sufficient flexibility to manage the public lands in light of ever-changing resource demands, uses, and technologies. By developing ovelry restrictive management practices, such as specific reclamation of mitigation ratio's, the BLM is limiting its ability to manage the public lands in light of new information. The management objectives, goals, and actions	If conditions change radically the BLM can prepare a land use plan amemdment. The BLM Land Use Planning Handbook (H-1601-1) on pg. 45 states that plan amedments can be promted to 1) respond to new, intensified, or changed uses on public land; and 2) consider significant new information from resource assessments, monitoring, or scientific studies that change land use plan decisions.

			established in the revised Moab RMP must be sufficiently flexible to manage the Moab RA for at least the next decade.	
Bill Barrett Corporation	214	4	The BLM cannot attempt to impose stipulations or conditions of approval (COAs) on BBC's existing leases that are inconsistent with its valid existing rights.	The DRMP/EIS as stated on pg. 1-13 and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), the planning process would recognize the existence of valid existing rights. Subject to valid existing rights, the BLM will work with a lease holder to modify proposed actions or activities to reduce the effect of the actions or activities on resource values and uses and also to protect threatened/endangered species and cultural resources. Additional modifications may be necessary to prevent undue and unnecessary degradation of public lands.
Bill Barrett Corporation	214	5	In developing the Moab RMP, the BLM must provide for and allow itself sufficient flexibility to utilize the categorical exclusions developed by Congress to streamline oil and gas permitting on federal lands.	The application of categorical exclusions for oil and gas operations is determined for site specific proposals. This process does not require a land use planning decision.
Bill Barrett Corporation	214	6	When finalizing the Moab RMP, the BLM should also acknowledge the BLM's recent decision to include geophysical exploration, when no temporary or new road construction is proposed, to the Department of the Interior's list of activities that do not require the preparation of an environmental assessment or environmental impact statement.	The NEPA documentation required for geophysical operations is determined on a site specific basis and does not require a land use planning decision.
Bill Barrett Corporation	214	7	FLPMA requires the Secretary of the Interior to comply with certain procedural mandates prior to closing an area of 5,000 acres or more to mineral development. Among the other requirements imposed on the Department of the Inteiror is the requirement for the Secretary of the Inteiror, as compared to the Director of the BLM or a State Director, to make all withdrawals of federal lands.	There are no withdrawals proposed under any of the alternatives in the DRMP/EIS. Withdrawals only apply to the general land laws which includes the Mining Law of 1872, as amended. The action alternatives do propose removing areas from mineral leasing which is discretionary and does not require a withdrawal.
Bill Barrett Corporation	214	8	FLPMA requires the Secretary of the Interior to comply with specified procedural requirements before making a management decision that totally eliminates a principal	If the BLM decides to eliminate a principal use on over 100,000 acres on a tract of land, then we will approach Congress.

			or major use of the public lands for a period of two or more years on a tract of land more than 100,000 acres in size.	
Bill Barrett Corporation	214	9	The BLM should carefully consider the impacts more restrictive stipulations will have upon oil and gas development in the Moab RA and, as required by the Energy Policy Act of 2005, ensure stipulations imposed are only as restrictive as necessary.	The analysis in Chapter 4 of the DRMP/EIS considers the impacts of restrictive stipulations on oil and gas development. The preferred alternative (Alt C) imposed the least restrictive stipulations necessary to protect the resources of concern while still allowing oil and gas development.
Bill Barrett Corporation	214	10	The BLM does not have any direct authority over air quality or air emissions under the Clean Air Act.. The BLM does not have authority to regulate emissions in Utah. The BLM must eliminate or revise the proposed management action.	We agree that the BLM does not have direct authority over air quality or emissions under the Clean Air Act. The State of Utah has primacy for compliance with the CAA. Permitted activities must meet air quality standards set by the State or the Environmental Protection Agency. The BLM and its permittees are subject to compliance with air quality standards. The goal stated for Air Quality in the DRMP/EIS (pg. 2-7) states "Maintain existing air quality and air quality related values by ensuring that all authorized uses on public lands comply with and support Federal, State, and local laws and regulations for protecting air quality". This statement does not imply that the BLM has the authority to regulate emissions or air quality. However, the BLM must ensure that all permitted activities on public lands are in compliance with air quality standards. Under Management Common to All for Air Quality in the DRMP/EIS pg. 2-7 it states "Manage all BLM and BLM-authorized activities to maintain air quality within the thresholds established by the State of Utah Ambient Air Quality Standards.
Bill Barrett Corporation	214	11	In anticipating potential air quality impacts the BLM also misunderstands the nature of oil and gas emissions. Emissions from oil and gas operations are not simply a matter of the number of wells in a particular area. The BLM should not attempt to impose restrictions on air quality through the RMP process. The BLM must revise	Our estimate of air quality impacts was based on the best available information and basic analysis assumptions. The commentor provides no specific information on how the analysis was in error. Refer to response to comment 214-10.

			its air quality goal to state that BLM's only management goal, objective, or action will be to ensure that the UDEQ is invited to participate in the NEPA process as part of the State of Utah's cooperating agency status.	
Bill Barrett Corporation	214	12	The BLM indicates that huge right-of-way (ROW) exclusion and avoidance areas will be created under all of the alternatives. Because the proposed avoidance and exclusion areas are not mapped, the BLM has not provided BBC with sufficient information to analyze how such restrictions may impact its ooperations. BLM must provide this informtion in the Final EIS for the Moab RMP revision. The BLM has also not adequately explained or justified the ROW avoidance and exclusion areas.	On pg. 2-11 of the DRMP/EIS it states that right-of-way avoidance and exclusion areas would be consistent with the stipulations identified in Appendix C for oil and gas leasing and other surface disturbing activities. The justification for the stipulations imposed are provided in Appendix C. The oil and gas leasing stipulations are shown on Maps 2-5-A, 2-5-B, 2-5-C, and 2-5-D.
Bill Barrett Corporation	214	13	The BLM has not adequately analyzed the impacts ROW avoidance and exclusion areas will have upon exinting oil and gas leases. The BLM must ensure that access is allowed to both existing and newly issued oil and gas leased in the Moab RA.	Refer to response to comment 214-4. Oil and gas leases issued after completion of the land use plan will be subject to the terms and conditions of the plan. The impacts of proposed right-of-way exclusion and avoidance areas is analyzed on pg. 4-64 through pg. 4-68 of the DRMP/EIS.
Bill Barrett Corporation	214	14	Surface use restrictions, including timing limitation stipulations (TLS), NSO stipulations, and controlled surface use (CSU) stipulations, as well as unavailable for leasing designations, cannot be retroactively applied to valid, existing oil and gas leases or to valid, existing use authorizations. The BLM cannot adjust a lessee's valid and existing rights.	Refer to response to comment 214-4.
Bill Barrett Corporation	214	15	The BLM should acknowledge the BLM's recent decision to include geophysical exploration, when no temporary or new road construction is proposed, to the Department of the Interior's list of activities that do not require the preparation of an environmental assessment or environmental impact statement.	Refer to response to comment 124-6.

Bill Barrett Corporation	214	16	The BLM has not analyzed or disclosed the potential impacts the restrictions on future leasing may have upon operations on existing leases. It is not enough for the BLM to simply assert that existing lease rights will be protected, the BLM must analyze how existing lease rights will be impacted by future limitations on leasing and development and what protection it will afford to said existing leases in the above described scenario.	The analysis in Chapter 4 of the DRMP/EIS identifies the impacts to oil and gas development from furture leasing stipulations. Although stipulations imposed on future leasing could impact existing leases, this type of analysis would require site specific information which can not be analyzed on a land use planning level. The commentor has not provided any information regarding the potential impacts to existing leases.
Bill Barrett Corporation	214	17	The BLM has not adequately justified managing areas which were not included in the original Wilderness Study Areas (WSAs) for wilderness qualities.	The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)).) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and

				management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics."
Bill Barrett Corporation	214	18	The BLM received new information from the Southern Utah Wilderness Alliance (SUWA), but does not specify what that new information was. That information should be readily available to the public in order to assess the quality of the information.	Information was received from the Southern Utah Wilderness Alliance regarding wilderness proposals both prior to, and during scoping. A reference to this information is made in Appendix P in the DRMP/EIS. This information is part of the adminstrative record for the land use planning process and is available to the public upon request.
Bill Barrett Corporation	214	19	Many of the non-WSA lands that supposedly have wilderness characteristics do not meet the criteria for wilderness, and should not be managed as wilderness and closed to oil and gas development. Human impacts can be seen throughout the areas, including active wells, plugged and abandoned wells, pipeline ROWs, roads, structures, and other imprints of human activitiy. This arbitrary drawing of boundaries enables the designation of wilderness in land that reallly by any common sense analysis does not meet the criterio of undisturbed land.	Refer to response to comment 124-54 and 121-71.
Bill Barrett Corporation	214	20	The BLM states that surface disturbing activities would be precluded within 100-year floodplains, 110 m of riparian areas, public water reserves, and within 100 m of springs. As currently drafted, the management action could be viewed as prohibiting all stream crossings within the planning area.	In Appendix C (page C-5) of the DRMP/EIS it states that an exception to these restrictions can be granted if 1) there are not practical alternatives or, 2) all long term impacts can be fully mitigated, or, 3) the activitiy will benefit and enhance the resource values. Appendix H provides the guidance for pipelines crossing stream crossings.
Bill Barrett Corporation	214	21	The BLM should map sensitive soils within the planning areas so that the public better understands how this management action will impact use of the public lands. In particular, the BLM should disclose and analyze how oil and gas leasing and oil and gas development operations would be impacted by this management approach.	Map 2-13 of the DRMP/EIS displays moderate to high saline soils. Saline soils are the component of sensitive soils of most concern to the Moab Field Office. A map of these soils is also referenced in Chapter 3. The stipulations for oil and gas leasing and other surface disturbing activities is provided in Appendix C under sensitive soils. The sensitive soils of concern are the saline soils delineated on Map 2-13.

Bill Barrett Corporation	214	22	The BLM should include a map showing the location of the Old Spanish Trail so that the public and oil and gas operators such as BBC understand how the trail designation may impact future uses of the public lands.	The National Park Service is currently preparing the Draft Comprehensive Management Plan/Environmental Impact Statement for the Congressionally designated Old Spanish Trail. Maps will be included in this document when it is issued to the public expected by the end of year 2008. The commentor should refer to this document for detailed maps when it is competed. The DRMP/EIS states on pg. 2-39 that this Old Spanish Trail Comprehensive Management Plan will be incorporated into the Moab RMP based on a Congressional mandate.
Bill Barrett Corporation	214	23	The BLM does not have the authority to require offsite mitigation. Further, offsite mitigation is not appropriate for most oil and gas projects. The BLM's Instruction Memorandum also instructed the BLM not to impose specific ratios for mitigation measures, a provision of the Insturction Memorandum the BLM has ignored in the Moab DRMP/EIS.	See response to comment 120-33 regarding BLM policy on off-site mitigation. The commentor provides no information regarding where off-site mitigation is a management action in any of the alternatives in the DRMP/EIS.
Bill Barrett Corporation	214	24	It would be inappropriate to require oil and gas lessees to "fully mitigate" impacts from oil and gas operations when oil and gas development is mandated and appropriate use of public lands. The management action should be eliminated or, at the very least, redrafted as follows: "Reasonably mitigate unavoidable habitat losses for special status species when such losses are anticipated to have a direct, measurable, and negative impact upon sensitive species." To the extent this requirement is intended to apply to species listed under the Endangered Species Act (ESA), the requirement is unnecessary because the formal conslultation process required by the ESA already contains a requirement to consider "reasonable and prudent alternatives" to mitigate potential impacts. The BLM should clarify this management action, define exactly which species or type of species to which it applies, and indicate that the BLM does not have the authority to reauire offsite mitigation.	The statement on pg. 2-44 of the DRMP/EIS which states "Fully mitigate all unavoidable habitat losses for special status species at a minimum of 1:1 ratio" has been changed from "fully mitigate" to "mitigate".
Bill Barrett	214	25	When developing the Moab RMP, the BLM should not	BLM Manual 6840 states "Ensure actions requiring

Corporation			place unnecessary restriction on management activities for the Gunnison's prairie dog in anticipation of potential listing.	authorizations or approval by the BLM are consistent with the conservation needs of special status species and do not contribute to the need to list any special status species under provision of the Endangered Species Act.". The proposed restrictions in the preferred alternative of DRMP/EIS were developed to meet this Manual requirement. BLM policy is to protect the habitat of the Gunnison's prairie dog so that management actions do not result in listing under the Endangered Species Act.
Bill Barrett Corporation	214	26	The Moab DRMP/EIS does not properly assess the affects restrictive land management decisions will have on the local economy, and the opportunities denied by severely restricting access to energy resources through a whole range of overlapping restrictions including wilderness-like designation of land, NSO, CSU, VRM, timing limitations, and others.	The impacts of imposing restrictions on oil and gas leasing are analyzed in Chapter 4 of the DRMP/EIS. The commentor provides no specific information on where the analysis is insufficient or improper.
Bill Barrett Corporation	214	27	On page 3-113 of the Moab DRMP/EIS, the analysis of the contribution of mineral resources, which as mentioned above does not provide an overall economic contribution of oil and gas, notes that production peaked in 1994 and has declined since. However, the data stops at 2000, just about the time that oil and gas commodity prices started to rise and, coupled with advances in the technology to recover unconventional resources, production throughout Utah and the Intermountain West started to soar.	Chapter 3 of the PRMP/FEIS has been updated to reflect the current trend in oil and gas production.
Bill Barrett Corporation	214	28	The BLM incorrectly describes the purpose and role of the RFD Scenario on page 4-3 of the Moab DRMP/EIS. The BLM suggests that "if the projections used in this impact analysis are significantly exceeded at some time in the future due to a continuing increase in oil and gas prices, then the analysis will have to be updated again." This language incorrectly suggests that the RFD Scenario is a limitation on future oil and gas	The language referred to on pg. 4-3 does not refer to any limitation on oil and gas development. The RFD is merely an analytical tool to assess the impacts of proposed BLM decisions regarding oil and gas leasing. A land use plan amendment would not be required. The BLM has revised the RFD scenario based upon public comment. The RFD scenario is an analytical

			development in the Moab RA. In the event oil and gas development exceeds the level predicted in the Moab DRMP/EIS, the BLM will have the opportunity to prepare appropriate additional NEPA analysis analyzing the impacts of increased development. The BLM will not be required to revise its resource management plan.	model, which estimates oil and gas activity that could potentially occur. The RFD scenario is a reasonable technical and scientific approximation of anticipated oil and gas activity based on the best available information, including the potential for oil and gas resource occurrence, past and present oil and gas activity in conjunction with other significant factors such as economics, technology, and physical limitations on access, existing or anticipated infrastructure, and transportation. The RFD is purely an estimate; it is not a decision document nor does it establish a limiting threshold for future Federal leasing, exploration, or development activities. Rather, it is a scenario or projection of actual and hypothetical oil and gas activities based on the specific circumstances or constraints associated with each alternative and corresponding mitigation measures. This hypothetical framework focuses the impact analysis associated with oil and gas leasing. Because the calculations are based on variables or factors that are difficult to accurately determine, the projection of oil and gas wells can vary greatly. These variables or factors include the price of oil and gas, the success or failure of exploration in unproven areas, and the willingness of investors to invest their money in risky exploration for oil and gas in unproven areas. As project-specific drilling operation are being considered, the BLM performs a land use plan conformance review and determination of NEPA adequacy. If conditions change, the BLM may need to reconsider the land use plan decision and perform further NEPA analysis in either an environmental assessment or an environmental impacts statement.
Bill Barrett Corporation	214	29	In order to prevent future litigation and appeals, the BLM must include language in the Moab RMP itself	The RFD scenario is an analytical model, which estimates oil and gas activity that could potentially occur. The RFD

			describing the purpose of the RFD Scenario, and the fact that the RFD Scenario is not a planning decision or limitation on future development.	scenario is a reasonable technical and scientific approximation of anticipated oil and gas activity based on the best available information, including the potential for oil and gas resource occurrence, past and present oil and gas activity in conjunction with other significant factors such as economics, technology, and physical limitations on access, existing or anticipated infrastructure, and transportation. The RFD is purely an estimate; it is not a decision document nor does it establish a limiting threshold for future Federal leasing, exploration, or development activities. Rather, it is a scenario or projection of actual and hypothetical oil and gas activities based on the specific circumstances or constraints associated with each alternative and corresponding mitigation measures. This hypothetical framework focuses the impact analysis associated with oil and gas leasing. Because the calculations are based on variables or factors that are difficult to accurately determine, the projection of oil and gas wells can vary greatly. These variables or factors include the price of oil and gas, the success or failure of exploration in unproven areas, and the willingness of investors to invest their money in risky exploration for oil and gas in unproven areas. As project-specific drilling operation are being considered, the BLM performs a land use plan conformance review and determination of NEPA adequacy. If conditions change, the BLM may need to reconsider the land use plan decision and perform further NEPA analysis in either an environmental assessment or an environmental impacts statement.
EnCana Oil and Gas (USA) Inc.	215	1	The Moab DRMP appears to make several management decisions that are most appropriately left to site-specific authorizations. For example, the BLM appears to impose best Management Practices	The procedures referred to are based on Washington Office Instruction Memorandum 2007-021 as well as the Gold Book. They will be applied as appropriate.

			regardless of their applicability or feasibility. The text on page C-3 states, "The following appropriate environmental Best Management Practices ("BMP") will be applied on individual Applications for Permit to Drill and associated right-of-way in the Moab Field Office." [emphasis added] EnCana strongly supports use of environmental Best Management Practices for all ail and gas operations ands strives to incorporate all practical BMPs on EnCana operations where applicable and appropriate based on site-specific considerations and reasons. BMPs should more consistently relate to the letter of IM No. 2007-021 and Surface Operating Standards and Guidelines for Oil and Gas Development (Gold Book), 2006 or the policy basis. IM No. 2007-021 states: Field Offices must be cautious to avoid the "one size fits all" approach to the application of BMPs. Environmental BMPs, by their very nature, are dynamic, innovations and must be flexible enough to respond to new data, field research, technological advances, and market conditions. Following implementation, Field Offices should monitor, evaluate, and modify BMPs as necessary for use in future permit approvals. Some of the listed BMPs are not appropriate and/or are impossible to comply with in all cases. For example, compare the statement in the Sixth bullet, "all flower lines will be buried in or immediately adjacent to the access roads" [emphasis added] to the statement in the Gold Book, "Flowline routes should take advantage of road corridors wherever possible to minimize surface disturbance and provide better leak detection and access for installation and repair operations. Consider maintenance needs and safety when burying power and pipelines in or immediately adjacent to the road" [emphasis added]. Notwithstanding those different approaches, currently recommendation from the BLM to	

			minimize surface disturbance on and across solid or rocky surfaces. As a second example, compare the statement in the Eleventh Bullet, "Nose reduction techniques and designs will be used to reduce noise from compressors or other motorized equipment" [emphasis added] to the statement in the Gold boo, "Noise that has the potential to disturb wildlife, livestock and private surface owners or neighbors should be controlled to reduce sound levels" [emphasis added]. Such a blanket requirement over the entire planning area is not justifiable where oil and gas operations and compressors are in very remote areas or areas near mining activity, and have no impact on wildlife, livestock and nearby surface owners.	
EnCana Oil and Gas (USA) Inc.	215	2	The BLM's Reasonably Foreseeable Development ("RFD") Scenario for the Moab Planning Area is inaccurate and would limit the opportunities to explore for new resources. Rather than Relying on outdated USGS data, the RFD Scenario should be based on the current levels of 3-D seismic activity and of the application for permits to drill in the area. The BLM should also include additional information explaining the purpose of the RFD Scenario and its role in the planning process. First, the BLM must update the RFD Scenario in light of the increase in drilling activity since it was developed. For example, Preferred Alternative C projects 435 wells in the next 15 years. Based solely on the 65 APDs approved in 206, the 15-year projection should be at least 975 wells. The Moab FO issued an updated RFD Scenario in August 2005 as part of the RMP revision currently underway. The 2005 RFD Scenario projected that 75 wells would be drilled in Lisbon Valley area over the next 15 years, 56 which would be drilled on BLM lands (see DRMP p.4-84). This equates to less than four wells per year. In 2007 EnCana alone drilled seven wells in Lisbon Valley area, and EnCana	See response to comment 214-1 and 214-28.

			anticipated drilling nine to twelve wells in 2008. The Moab DRMP recognizes that the number of wells drilled has increased significantly due to higher energy prices and projects that twice as many wells will be drilled in 2007 as compared to 2007 (see DRMP p.3-44), yet the Moab DRMP does not take the increased level of activity into account. The BLM's RFD Scenario should be updated to reflect continued growth.	
EnCana Oil and Gas (USA) Inc.	215	3	In addition, the BLM assumption that complex subsurface geologic conditions could result in only 50% of the wells being successful producers likely underestimates the actual number of productive future wells by 50%. EnCana has experienced a 90% success rate in its Lisbon Valley over the last four years.	The success rate in the BLM assumption is based on the entire Moab planning area and not just on drilling in Lisbon Valley.
EnCana Oil and Gas (USA) Inc.	215	4	The assumptions in the RFD underlying projects of geophysical activity are also inaccurate. An assumption of four linear miles of source line for each square mile of 3D seismic activity cannot be uniformly applied. The BLM must make it clear that this number is not a limitation	See response to comment 124-28.
EnCana Oil and Gas (USA) Inc.	215	5	The BLM should adequately identify the purposes of the RFD, which is not a limitation on development. EnCana appreciated the BLM's recognition that "the total number of wells cited in the RFD report does not represent upper limits on the number of wells that could be drilled in the Moab Planning Area during the life of the plan." (DRMP page 4-4) However, the statement on page 4-3, "if the projections used in this impact analysis are significantly exceeded at some time in the future due to a continual increase in oil and gas prices, then the analysis will have to be updated again," incorrectly suggests that the RFD Scenario is a limitation on future oil and gas development. The BLM should include additional, specific information the Final EIS, the Record of Decision, and the actual Resource Management Plan for the Moab Planning Area	See response to comment 214-28.

			confirming the fact that the RFD Scenario is not a planning decision of limitation on the level of development authorized within the Moab Planning Area. The RFD is defined by the BLM as a "basline scenario of activity assuming all potentially productive areas can be open under standard lease terms and conditions, except those areas designated as closed to leasing by law, regulation or executive order." BLM Instruction Memorandum 2004-089, Attachment 1-1 (January 16, 2004). The RFD is neither a Planning Decision nor the "No Action Alternative" in the NEPA document. "In the NEPA document, the RFD is based on scenarios adjusted under each alternative to reflect varying levels of administrative designations, management practices, each alternative to reflect varying levels of administrative designations, management practices, and mitigation measures." BLM Instruction Memorandum 2004-089, Attachment 1-1 (January 16, 2004). The RFD is based on review of geologic factors that control the type and level of oil and gas activity. The RFD also considers petroleum engineering principles and practices and economics associated with discovering and producing oil and gas. BLM Instruction Memorandum 2004-089, Attachment 1-3 (January 16, 2004). On Several occasions the Interior Board of Land Appeals has confirmed that the RFD Scenario is not a limitation on development. In these decisions, the IBLA has made it clear that the RFD Scenario is not a planning decision, nor is it a limit on future development. Wyoming Outdoor Council, 164 IBLA 84, 89 (2004) (holding with respect to the Pinedale RMP that the RFD Scenario does not establish "a point past which future exploration and development is prohibited"); Southern Utah Wilderness Alliance, 159 IBLA 220, 234 (2003) (holding that the Book Cliffs RMP did not establish a well limit); Wyoming Outdoor	

			Council, et al. IBLA No. 2006-155 at *26 (June 28, 2006) (holding that the Pinedale RMP does not restrict the number of wells that can be drilled within the Pinedale Resource Area); Biodiversity Conservation Alliance, et al. IBLA No. 2004-316 at *7 (Oct. 6 2004) (citing Southern Utah Wilderness Alliance, 159 IBLA at 234) (holding that the "RFD scenario cannot be considered to establish a limit on the number of oil and gas wells that can be drilled in a resource area.") As indicated by the number of decisions cited about, the purpose of the RFD Scenario continues to be a source of confusion and litigation. In order to reduce such confusion and litigation, the BLM should include language in the Moab DRMP itself describing the purpose of the RFD Scenario, and the fact that the RFD in the Moab DRMP itself describing the purpose of the RFD Scenario, and the fact that the RFD Scenario is not a planning decision or limitation on future development.	
EnCana Oil and Gas (USA) Inc.	215	6	The 1-hour ozone standard of 0.12 ppm shown in Table 3.2 was revoked by the EPA in June 2005. The table should be corrected. The ozone concentration for Mesa Verde National Park of 0.078 ppm shown in Table 3.2 does not agree with the concentration of 0.070 shown in the table on the National Park service website (http://www2.nature.nps.gov/air/monitoring/exceed.cfm). The source of the data in Table 3.2 is not clear. It is important to note, however, that the comparison to the ozone NAAQS is the 4th highest daily maximum 8-hour average, averaged over three years. For Mesa Verde National Park, using the three-year average of 2001, 2002, and 2003, the average for compliance comparison is 0.067 ppb. In addition, due to rounding, an exceedance of the standard is not binding until a three year average is 0.085 ppb or higher. The statement in the first paragraph on page 3-9, "The	The BLM will comply with whatever air quality standard is in place at the time of permitting actions.

			UDEQ indicated that ozone concentrations in Class I areas of the western states have shown significant increases in the past decade and are approaching the NAAQS level" is not supported by the table from the National Park Service. Only in Rocky Mountain National park did ozone levels peak in 2002 and 2003; the levels have since dropped	
EnCana Oil and Gas (USA) Inc.	215	7	Section 3.14.3.2.2 Salinity (p. 3-112) The second paragraph of this section states that the release of saline groundwater during drilling activities is a point source for salinity. This statement is inaccurate because groundwater is not released during drilling activities in natural gas drilling operations	The reference to the release of saline groundwater during drilling has been deleted from the text of the PRMP/FEIS.
EnCana Oil and Gas (USA) Inc.	215	8	EnCana believes that several of the ACECs do not contain adequate justification for closing those lands to development. Twelve of the 14 ACECs listed in the DRMP have existing leases. While the leases would remain valid until they expire, the potential exists to limit future development in prospective areas because of ACEC designations. This is unjustifiable where there are existing laws, stipulations, and policies to protect sensitive areas identified in many of the ACECs while still developing the energy resource. NEPA and BLM policy require that the BLM make available for public comment the information upon which the decisions to designate ACECs were reached, including the underlying analysis for the proposed and existing ACECs. Isle Royale, 154 F. supp. 2d at 1127; Trout Unlimited, 509F.2d at 1284; BLM ACEC Manual 1613.06-.4. The DRMP does little to disclose to the public how and on what information the proposed ACEC determinations were reached. New ACECs can be nominated by a variety of sources, and indeed, the ACECs considered in DRMP were nominated by various organizations. However, there is a lack of disclosure about these submissions, the	See response to comment 203-9.

			materials serving as the basis of analysis by the BLM interdisciplinary team, and how these procedures compiled with existing bLM policy. The DRMP fails to explain why other management prescriptions or designations in place are inadequate and necessitate the proposed ACEC designations in lieu of less restrictive alternatives. Regardless of how the ACECs were determined, the examination requires much more than merely examining the importance and the relevance criteria. Disclosing this information allows the public to ascertain the quality of information used by BLM, the location of the source of information and the availability of the information for public review.	
EnCana Oil and Gas (USA) Inc.	215	9	43 U.S.C 1702(j) (2006). Because the decision to make an area unavailable for leasing constitutes a withdrawal, the Department of the Interior will be required to comply with the procedural provisions of Section 204 FLPMA. 43 U.S.C 1714 (2006). Among other things, only the Secretary of the Interior-or a designee in the Secretary's office appointed by the President and confirmed by the Senate-has the authority to make withdrawals of federal lands. 43 U.S.C 1714(a) (2006). The Secretary is also required to provide notice of the proposed withdrawal in the Federal Register and conduct hearings regarding the withdrawal. 43 U.S.C 1714(b) (1) and (h). Finally, the Secretary is required to notify both houses of Congress of specific information relating to the proposed withdrawal. See 43 C.F.R. 1610.6; 43 U.S.C. 1714 (c) (2) The Moab DRMP does not contain adequate justification for declining to reissue expired leases under these standards. The DRMP notes that withdrawals "are used to preserve sensitive environmental values, protect major Federal investments in facilities or other improvements, support national security, and/or provided for public health and safety." (See DRMP	See response to comment 214-7.

			page 3-31) But no such analysis is provided. Before the BLM takes such steps, it "must ensure that withdrawals are supported by a definite show of need and must recommend revocation of withdrawals that lack sufficient justification." 43 C.F.R. 231.1-2.	
EnCana Oil and Gas (USA) Inc.	215	10	As development operations are proposed in the future, the BLM cannot attempt to impose new stipulations or conditions of approval (COA) on existing leases that are inconsistent with their valid existing contractual rights. Once the BLM has issued a federal oil and gas lease without a no surface occupancy stipulation (NSO), and in the absence of a nondiscretionary statutory prohibition against development, the BLM cannot completely deny development on the leasehold, nor impose mitigation measures inconsistent with the BLM's authority under 43 C.F.R. 3101.1-2. Only Congress has the right to completely prohibit development once a lease has been issued. On Page 4-8 of the DRMP, the following statement appears: "Due to these existing leases, it is possible that wells could be drilled in areas that are proposed in this plan to be managed as closed or NSO for oil and gas leasing." In the Final EIS, the BLM should expand this statement to discuss the fact that oil and gas lease is a contract between the federal government and the lessee, and that the lessee has certain rights thereunder. See Mobil Oil Exploration & Production Southeast, Inc V. United States, 530 U.S. 604, 620 (2000). The Moab RMP, when revised, cannot defeat or materially restrain valid and existing rights to exploit its leases through COAs or other means. See, eg., 43 C.F.R. 1610.5-3.	See response to comment 214-4.
EnCana Oil and Gas (USA) Inc.	215	11	Section 3.16.2.1.14 on page 3-151 states, "No sightings [of Gunnison sage grouse] have been reported in the past ten years." The imposition of restrictions associated with leks is incongruous with the lack of presence of the species. In addition, the buffer around Sage Grouse leks is excessive. Preferred Alternative C	See response to comment 203-40.

			specifies a 0.6 mile buffer around all Gunnison Sage Grouse leks within approximately 175,727 acres of potential habitat, and a 0.5 mile bugger around all Greater Sage Grouse leks within approximately 3,068 acres of habitat. (See DRMP page 4-105) These buffers are excessive. Normal practice throughout the Intermountain West is reflected Alternative D, 0.25 mile buffers around leks, which should be the buffer specified in the final RMP	
EnCana Oil and Gas (USA) Inc.	215	12	The characterization of geophysical activity in the DRMP as a surface disturbing activity is inaccurate (see p 4-8). The BLM should also acknowledge its recent decision to include geophysical exploration, when no temporary or new road construction is proposed, in the Department of the Interior's list of activities that do not require the preparation of an environmental assessment or environmental impact statement. See DOI Manual, Chapter 11.9.B(6), (516 DM 11.9.B9b)), 72 Fed.Reg. 45504, 45539 (August 14, 2007). The BLM recognized the limited and temporary impacts associated with such activities. The assumption that impacts resulting from geophysical exploration surveys would require 10 years for surface reclamation is also in error and contradicts the premise of the categorical exclusion that such surveys are, in fact, a casual use operation whose impacts are sufficiently insignificant that they may be approved without an analysis by an environmental assessment or environmental impact statement if no new road construction is involved. In fact, geophysical survey operations to reflect the concept of "usage," where no grading and/or blading of the surface are required. The inaccurate characterization of geophysical survey activities should be corrected throughout the DRMP, including pages 4-16, 4-83, and all other references to "seismic disturbance."	See response to comment 214-6. For the purpose of analysis in Chapter 4 of the DRMP/EIS, it is assumed that cross country travel for geophysical operations result in surface disturbace that require about 10 years to fully reclaim. These assumptions are based on BLM experience in the area.
EnCana Oil and Gas (USA)	215	13	The assumptions made by the BLM are inconsistent in some places within the DRMP. Assumptions made to	On pg. 4-16 it states that conservative assumptions were used to better ensure that the findings do not

Inc.			assess impacts should be uniform and consistent throughout the analyses for all resources. See 43 C.F.R. 1610.3-2. The assumption used for the analysis of air quality impacts is that "all proposed wells would go into production within 15 years and then operate at full production levels with no 'dry holes' or 'shut ins'." (see p.4-16) This assumption is contradicted by the assumption for reclamation described in section 4.1.3.10 on p. 4-7 (and also on p. 4-83): "The assumptions for reclamation for oil and gas are that 50% of the wells drilled would be productive and 50% would be abandoned and reclaimed and revegetation would be successful." (See comment on page 3, infra, regarding EnCana's success rate.) Nevertheless, without consistent and defensible assumptions, impacts to resources from each of the alternatives cannot be compared. For example, Table 4.3, which displays predicted surface and disturbance, does not appear to consider the 50% plugging and abandonment rate assumption. It is difficult to determine where the assumption was considered and where it was not.	underestimate future impacts. For example, it was assumed that all proposed wells would go into production within 15 years, and then operate at full production levels with no "'dry hoes or "shut- ins," while in reality a small percentage of dry holes and shut-ins would be expected to occur. This is a full production scenario to determine if air quality standards would be exceeded over the life of the plan. The assumption on surface disturbance associated with wells drilled is more realistic. Although the two assumptions are different they serve different anaytical purposes.
EnCana Oil and Gas (USA) Inc.	215	14	The reference to "proposed wells" is inaccurate. The DRMP analysis should refer to the number of wells projected by the RFD Scenario	The number of wells by alternative utilized in the air quality analysis in Chapter 4 of the DRMP/EIS. In the PRMP/FEIS the wording has been changed from proposed wells to projected wells.
EnCana Oil and Gas (USA) Inc.	215	15	The assumption on page 4-18 that a control efficiency of 37% would be obtained by watering of all exposed disturbance areas is inconsistent with the assumption on page 4-16 that 50% control of particulate emissions would be obtained by watering. The DRM should be corrected to consistently reflect the assumptions actually used in the quantification of impacts	The PRMP/FEIS has been corrected in Chapter 4 on air quality to reflect consistent assumptions.
EnCana Oil and Gas (USA) Inc.	215	16	The assumption on page 4-17 that flaring emissions are primarily NOx and CO is incorrect. Flares are used to dispose of unrecoverable gas emerging concurrently with the crude oil. During flaring, gaseous methane	This assumption was based on the Vernal Air Quality modeling. See Trinity and Nicholls 2006 for justification of assumptions.

			reacts with atmospheric oxygen to form primarily carbon dioxide and water. Other minor emissions from flaring include unburned hydrocarbons, CO, and other partially burned and altered hydrocarbons. Acetylene (non-HAP) is typically formed as a stable intermediate product; however, acetylene formed in combustion reactions may react further to form polycyclic hydrocarbons (HAP). Flaring operations usually achieve at least 98 percent combustion, such that hydrocarbon and CO emissions amount to less than two percent of the hydrocarbons in the gas stream (U.S. Environmental Protection Agency (EPA). 2005. AP 42, Fifth Edition Compilation of Air pollutant Emission Factors, Volume 1: Stationary Point and Area Sources).	
EnCana Oil and Gas (USA) Inc.	215	17	Table 4.10 on page 4-27 estimates the number of compressors at each RFD Scenario area at 0.063 compressor per well within a minimum of 2 compressors per RFS area. Compressors are located in areas where natural gas is produced into pipelines. The broad assumption allotting compressors to all RFD Scenario areas is likely inaccurate for RFD Scenario areas where the predominant mineral produced is liquid hydrocarbons and/or where no pipelines exist for gas transport out of the area.	The RFD is purely an estimate; it is not a decision document nor does it establish a limiting threshold for future Federal leasing, exploration, or development activities. Rather, it is a scenario or projection of actual and hypothetical oil and gas activities based on the specific circumstances or constraints associated with each alternative and corresponding mitigation measures. This hypothetical framework focuses the impact analysis associated with oil and gas leasing. Thus, the number of compressors per well is for analysis purposes only. As project-specific drilling operations are being considered, the BLM performs a land use plan conformance review and site specific NEPA analysis.
EnCana Oil and Gas (USA) Inc.	215	18	The BLM has not adequately explained or justified the right of way ("ROW") exclusion area throughout the Moab Planning Area. EnCana owns numerous oil and gas leases in the planning area and its ability to develop	See response to comment 214-12 and 214-13.

			those leases would be significantly impacted if the BLM inappropriately limits EnCana's ability to access its leases. EnCana is concerned that the proposed restriction and avoidance of future ROWs under all alternatives may prevent it from delivering produced natural gas via pipeline to a distribution system in place. Preferred Alternative C exclusion and avoidance areas comprise over 20% of the planning area (a total of 370,250 acres would be ROW exclusion areas and an additional 217,480 acres where surface disturbance activities are limited would be avoidance areas for new ROWs) (See p 4-67) The DRMP does not have any maps that show all areas where ROWs would be excluded and/or avoided. Consequently, EnCana cannot evaluate possible impacts from proposed ROW monument to its operations. It is also not clear if the creation of the ROW exclusion and avoidance areas was done talking into consideration valid and existing lease rights. While the issuance of the oil and gas leases does not guarantee access to the leasehold, a federal lessee is entitles to use such part of the surface as may be necessary to produce the leases substance. 43 C.F.R. 3101.1-2 (2006)	
EnCana Oil and Gas (USA) Inc.	215	19	There is a typographical error on page 4-68 in the last line of the second full paragraph. The line should read, "Alternative D, and would have corresponding impacts on the construction of future ROWs"	This is a typographical error, and it has been fixed.
EnCana Oil and Gas (USA) Inc.	215	20	The first sentence of this Section (p. 4-93) should be modified to say that no additional BLM lands would be closed to salable and leaseable mineral resource development. Table 4.38 on page 4-85, shows that there are already 392,205 acres (2.1%) of closed BLM lands. This is an inaccurate sentence and needs to be modified to correctly identify that there are closed areas under Alternative A	The wording in this section has been changed to "Under Alternative A, no acres of lands with wilderness characteristics are to be managed to protect these characteristics, resulting in no additional closures of BLM lands to salable and leasable mineral resource development."
EnCana Oil and Gas (USA)	215	21	In this Section, effects on soils and water resources are determined by comparing the Alternatives against one	The mitigation measures identified by the commentor are applied to site specific proposals. The assessment of

Inc.			another. However, there appears to be no determination that any of the four alternatives are so detrimental to soil and water resources as to be unacceptable. Please keep in mind that the BLM has developed standards for stormwater controls and reclamation using certified seed mixtures, etc., and Spill Prevention, Countermeasure and Control Regulations are also applied to this area for soil and groundwater protection. To be consistent with the air quality determination, the following statement should be included in this section: Assuming appropriate application of control measure and strict adherence to existing regulatory and permitting processes, no appreciable cumulative, short-term or long-term, adverse soil and water resource effects are projected specific to oil and gas development.	impacts to soils was based on projections of surface disturbance by alternative. This provides a reasonable basis for the comparison of impacts by alternative. Control measures can reduce impacts such as soil erosion but they do not eliminate the impacts.
EnCana Oil and Gas (USA) Inc.	215	22	EnCana is concerned about the level of personnel and staffing at the Moab Field Office. Operators already experience significant permit delays, and it is not clear to us how the BLM will manage and implement even the Preferred Alternative C absent an increase in personnel	The DRMP/EIS asserts that adequate personnel and staffing will be provided to implement the preferred alternative. This is stated on pg. 4-3 of the DRMP/EIS: "BLM would have the funding and work force to implement the selected alternative."
Delta Petroleum Corporation	220	1	The economic analysis presented in the DEIS is based on old and outdated information with respect to oil and gas development. It relies on data from 2003 and older. The economic picture, development activities and approaches to resource extraction have undergone a major shift in the last 7 years based on several factors including demand for energy resources, federal policy and legislation and rises in the energy costs. It is critical that the DEIS depend on the best and most recent data available. The analysis on oil and gas resources does not rely on available recent data, but primarily on information prior to 2004 which does not reflect changes in the economy, need to increase domestic supplies of energy, impacts of high energy costs on communities and federal resource priorities	The BLM has incorporated updated production data in Chapter 3 of the DRMP/EIS. State of Utah data shows a continuing decline in production in Grand County through 2007. The BLM acknowledges that production could increase in the future, and has incorporated its predictions of future well activity in its RFD. The BLM has also incorporated data from The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry Phase III - Grand County. This recent study (January, 2008), commissioned by the State of Utah and done by the University of Utah, confirms the relatively minor contribution that minerals development makes to the planning area's economy.

			from the Energy Policy Act of 2005. That information is readily available from both State and Federal sources, including some information in 2007, yet non of this recent information has been included in the DEIS. This is a major flaw under NEPA, since readily available information should be used for decision making. This affects economic impacts and projections within all of the alternatives. Since this information is readily available, the BLM should amend the DEIS to reflect that information. A decision that affects land uses for the next 15-20 years should not be based on faulty assumptions and old information	
Delta Petroleum Corporation	220	2	It appears that the BLM policies for establishing an ACEC and demonstrating that existing laws and regulations are inadequate to protect these special areas has not been followed. The information used by the BLM to reach a decision that up to 14 ACECs are needed within the MRA has not been included in the DEIS as required by NEPA The inclusion of existing leases within these areas would suggest that management by stipulation is the appropriate way to consider oil and gas development within these areas. Lease stipulations should be developed that are specific to the purpose of the ACEC and the protections warranted by omission from other laws and regulations. Such analysis of risk versus multiple uses is not present in the DEIS so there is no way to evaluate how the BLM can reach the land restrictions proposed for the ACES's. In addition, there are a number of existing laws, regulations and policies to protect the water, air, cultural and other resources identified in the ACECs. In what appears to be a failure to meet regulatory requirements, the RMP contains little in the way of explaining to the public how the BLM reached the designations and proposed land restrictions.	The preferred alternative manages five ACECs, totalling 63,000 acres. Valid existing rights within these areas are recognized and would be honored. See also response to comments 203-2, 203-9, 203-10, 203-10, 203-11, 203-12, 203-13 and 203-14. None of the ACECs mentioned as having conflicts with utility corridors are proposed for management under the preferred alternative.

			Several of the proposed ACEC's overlie existing utility corridors within the MRA. The existing and future use of these utility corridors needs to be recognized and protected within any new designation of an ACEC. This is particularly true for the proposed Upper Courthouse, Wilson Arch, Cisco White Tailed Prairie Dog Complex, and Colorado River Corridor ACECs	
Delta Petroleum Corporation	220	3	On September 28, 2007, the Utah BLM canceled its November 13th lease sale covering 141,717 acres. The financial impact of this cancellation can be measured by taking the average price per acre paid at the previous lease sale of August 21, 2007 of $31 per acre times 141,717 acres to be sold. The projected value of this sale would have been over $4,500,000. However, that number does not take into account lost wages, royalty payments, taxes and other economic benefits related to production from that acreage. Nor does it take into account the shift in trade balance from domestic production versus foreign importing of oil and gas resources. These are important considerations that must be included within the economic analysis for the DEIS. Finally, the economic value of proposed land restrictions must be evaluated for the economic losses and penalties to the resource industry as well as the economic value produced by protections to those lands ecological or other perceived benefits. Economic impacts occur both from lost extraction as well as ecological and social benefits. The value of a pristine vista must be weighted against the temporary impact to that vista from oil and gas development in implementing land use restrictions. It is not an either or decision, nor an irrevocable commitment of resources in this case. A true valuation of both sides of the equation is needed to reach a truly balanced decision on how to administer	Addressing the economic impacts of a single past lease sale cancellation is beyond the scope of the DRMP/EIS. The BLM acknowledges the (temporary) loss of revenue from this cancelled sale. There is no reason to believe, however, that a future lease sale involving these (or similar) parcels would not generate similar positive economic benefits. The DRMP/EIS attempts to address the impacts over a longer period of time than a single sale, and estimates economic impacts from the projected number of wells expected to be drilled over the 15-20 year life of the plan. There is no way for the BLM to predict the exact timing of these sales, or to predict their results. Data on the fiscal impacts from the various action alternatives have been added to the PRMP/FEIS. The shifts in trade balance suggested by the commentor are influenced by a myriad of local, national and international factors, most of which are beyond the control of the BLM, and certainly beyond the scope of planning for the Moab Field Office. CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management

			multiple land use policies. Such evaluations and considerations have not been presented within the DEIS. The BLM has not presented a rationale for reaching a balance as claimed in alternative C	prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. The BLM, in developing the PRMP/FEIS, can chose management actions from within the range of the alternatives presented in the DRMP/EIS and can create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple-use mandate. The term “multiple use” as defined in FLPMA means “the management of the public lands and their various resource values so that they are used in the combination that will best meet the present and future needs of the American people.” This direction indicates that not all uses need to be accommodated in all areas. The DRMP/EIS includes a detailed evaluation of all options to ensure a balanced approach. This balanced approach will ensure protection of resource values and sensitive resources while allowing opportunities for mineral exploration and production. The PRMP/FEIS will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
Fidelity Exploration and Production Co.	221	1	The BLM's analysis does not provide Fidelity with a sufficient understanding of how its existing lease rights or potential future operations may be impacted by the adoption of the revised RMP. The BLM must present detailed information and analysis in the revised RMP in a coherent and focused format in order to comply with its procedural obligations under the NEPA	See response to comment 214-4.
Fidelity Exploration	221	2	BLM has a responsibility to include a comprehensive socio-economic analysis that is lacking in this DRMP.	In 2007, Grand County provided 0.5% of Utah's total oil production and 1.8% of Utah's total gas production

and Production Co.			The following should be giving more consideration: -Oil and gas are vital sources of energy for the nation. BLM should discuss increasing energy demands, decreasing domestic energy supplies, and the strategic necessity for development of mineral resources. Utah oil and natural gas resources need to be identified as crucial to help offset the deficit between supply and demand. -Federal lands contribute nearly one-third of the nation's natural gas supply; therefore, accounting for every resource rich area is crucial to producers and consumers. The DRMP should discuss the role of the planning area in the nation's natural gas supply -The full, positive economic impact of mineral development in the planning area was not adequately analyzed, nor did the document analyze the negative impact associated with the severe restrictions called for in the Preferred Alternative C. Furthermore, the DRMP states that under Alternative b, the long-term economic benefits from oil and gas development would be slightly less than current circumstances or if Alternatives C or D were adopted (Table 2.2, p.2-78-2-79) This conclusion is counter-intuitive; it defies logic how the extremely restrictive Alternative B would have only slightly lower economic benefits from oil and gas when it would place so many more restrictions on development. Clearly, that analysis is flawed. BLM would greatly benefit from a comprehensive economic analysis of the impact of oil and gas to the region such as is currently underway by the University of Utah's Bureau of Economic and business Research for the Utah Governor's Office of Public Land Policy Coordination Office (The Structure and Economic	(DOGM, 2006). Utah ranks 12th nationally in oil production and 10th nationally in gas production (DOGM, 2008). These figures do not support the commentor's assertion that this is crucial to the nation's energy supply. The impacts of minerals on social and economic conditions are detatiled on pg. 4-259 through pg. 4-264. This analysis provides a reasonable assessment of the socioeconomic impacts. The restrictions imposed on oil and gas leasing in Alt B would result in fewer wells developed than in Alts, C, D, or A. These numbers are 264, 432, 448, 451, respectively. Therefore, Alt B would result in 168 fewer wells over the life of the plan. The well numbers were based on the Reasonably Foreseeable Development scenario for oil and gas and spread by alternative based on the restrictions impased under each alternative. Impacts of minerals on socioeconomics are based on these well numbers. Economic information on royalties, employment, severance taxes, and impacts to State revenues have been augmented in Chapter 4 of the PRMP/FEIS. Information has been added to the PRMP/FEIS using the newly completed study by the University of Utah Bureau of Economic and Business Research (Juanuary 2008) "The Structure and Economic Impact of Utah's Oil and Gas Production and Industry, Phase III - Grand County". Therefore, use of the study in Uintah County suggested by the commentor is not appropriate.

			Impact of Utah's Oil and Gas Exploration and Production Industry Phase I-The Uinta Basin) (Draft, November 2007)) -Each alternative contained in the DRMP includes some lands closed to energy resource development. Such closures re based on BLM's assessment of resource values on those lands. Closure also implications, however, in terms of national energy consumption and commodity prices, foregone employment opportunities, tax revenues, and support for state and local economies. Although BLM must necessarily base land use decisions on consideration of all resources values, social and economic impacts of closure decisions should be estimated to fulfill the agency's mandate under FLPMA, and to comply with guidelines contained in BLM's Land Use Planning Handbook (H-1601-H) and Instruction Memorandum (IM) No. 2002-167	
Fidelity Exploration and Production Co.	221	3	BLM has not adequately addressed the negative impacts to the School and Institutional Trust Lands Administration (SITLA) that would follow adoption of Alternatives B or C. Restrictions imposed by these alternatives would impede access to SITLA minerals, severely reduced the income generated by Federal mineral royalties, and thereby, significantly impact all public schools in the region.	See response to 120-10 and 120-101.
Fidelity Exploration and Production Co.	221	4	Prior to implementing oil and gas stipulations, BLM should conduct a complete cost/benefit analysis of individual stipulations, conduct a thorough data review on the proposed stipulations, and adopt a monitoring program to tract the effectiveness of and continuing need for the stipulations	The BLM analyzed the socioeconomic impacts of the different alternatives on oil and gas leasing and development. This information is presented on pg. 4-259 through 4-265 of the DRMP/EIS. It is neither feasible nor practical to conduct cost/benefit analysis on individual stipulations at the land use planning level. The leasing stipulations applied in the Preferred Alternative of the DRMP/EIS are the least restrictive necessary to protect the resource value of concern. Exceptions, modifications, and waivers can be applied to stipulations based on certain condition (see Appendix C). The BLM conducts

				monitoring during implementation of site specific actions.
Fidelity Exploration and Production Co.	221	5	There should be recognition and disclosure in the DRMP that changes in oil and gas technology will create the benefit of allowing development and operations to take place with less disturbance and impact that might have been the case historically. Some examples include horizontal dripping reducing well numbers, electronic flow measurement reducing trips to the well, coiled tubing operations reduction completion time, etc.	The BLM is aware that changes in industry technology occur and the adjustments to stipulations will take place accordingly. It is not necessary to make a statement as proposed by the commentor in the DRMP/EIS.
Fidelity Exploration and Production Co.	221	6	Several of the Areas of Critical Environmental Concern (ACECs) do not contain adequate justification for closing those lands to development. Twelve of the 14 ACECs listed in the DRMP have existing leases. While the leases would remain valid until they expire, the potential exists to limit future development in prospective areas because of ACEC designations. This is not necessary as there are existing laws, stipulations, and policies to protect resources identified in many of the ACECs. -NEPA and BLM policy require that the BLM make available for public comment the information upon which the decisions to designate ACECs were reached, including the underlying analysis for the proposed and existing ACECs (Isle Royale, 154 F Supp. 2d at 1127; Trout Unlimited, 509 F.2d at 1284; BLM ACEC Manual 1613.06-4.) The DRMP, however, does little to disclose to the public how and on what information the proposed ACEC determinations were reached. -New ACECs can be nominated by a variety of sources, and indeed, the ACECs considered in DRMP were nominated by various organizations. There is a lack of disclosure about these submissions, however, as well as the materials serving as the basis of analysis by the BLM interdisciplinary team and how these procedures	See response to comments 214-4, 203-8, 203-9, 203-10, 203-11, 203-12, 203-13 and 203-14. It should be noted that only 5 of the 14 ACEC proposals are designated in the preferred alternative. The total acreage of those designated in the preferred alternative is 63,000 acres.

			complied with existing BLM policy. THE DRMP fails to explain why other management prescriptions or designation in place are inadequate and necessitate the proposed ACEC designations. -Regardless of how the ACECs were determined, the examination requires much more than merely examining the importance and relevance criteria. Disclosing this information allows the public to ascertain the quality of information used by BLM, of the source of information, and the availability of the information for public review. -The DRMP fails to demonstrate that the proposed ACEC decisions meet the regulatory criteria of importance and relevance (43 VFR 1610-7-2) Secondly many of the identified resource values already receive adequate protection through other management prescriptions: -ACECs may be designated "where special management attention is required…to protect and prevent irreparable damage" (43 USC 1702(a).) -ACECs are unnecessary when other designations are adequate to protect a resource or value (BLM Manual 1613.51-53.)	
Fidelity Exploration and Production Co.	221	7	As development operations are proposed in the future, the BLM cannot attempt to impose new stipulations or COAs on Fidelity's existing leases that are inconsistent with its valid existing contractual rights. In addition to proposed closures or NSO stipulations, the BLM should also note that constraints associated with the management of other resources would not necessarily apply to exploration or development activities on leases that pre-date the DRMP. The DRMP cannot deny Fidelity's valid and existing rights to exploit its leases	Valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decision are subject to valid existing rights. The BLM will work with and subject to the agreement of holders of valid existing rights to modify proposed actions or activities to reduce the effect of the actions or activities on resource

			through COAs or other means.	values and uses. These modifications may be necessary to maintain the choice of alternatives being considered during land use plan development and implementation, and may include appropriate stipulations, relocations, redesigns, or delay of proposed actions.
Fidelity Exploration and Production Co.	221	8	The Reasonable Foreseeable Development (RFD) section, which protects the amount of oil and natural gas development within the planning area is inadequate and would limit the opportunities to explore fore new resources. Preferred Alternative C projects 435 wells in the next 15 years. Rather than relying on outdated USGS data, the RFD should be based on 3-D seismic activity in the area and the current level of application for permit to drill (APD) activity. Just based on 2006 APD data of 65 APDs, the 15 year projection should be at least 975 wells. BLM should also solicit information about the potential for oil and gas development from the operators within the DRMP area to assist in the preparation of a realistic, potential reasonable foreseeable development.	See response to comment 203-15.
Fidelity Exploration and Production Co.	221	9	The RFDS for Big Flat-Hatch Point area is too low. BLM states: "The RFD is a hypothetical scenario which allows the discussion to focus the analysis of potential impacts" (p.4-83) Fidelity strongly urges the BLM to consider revising its RFDS in active cooperation with the oil and gas operators that hold leases in the Moab planning area to increase the projected well count. The Moab Field Office issues RFDS as part of the RMP revision currently underway. The RFDS projected that 60 wells would be drilled in the Big Flat-Hatch Point area over the next 15 years, 50 of which would be drilled on BLM lands (p.4-84) This rate of activity equates to approximately four wells per year. During 2007, Fidelity drilled two federal wells in the big Flat area and plans to drill one additional Federal well and possibly two State wells in 2008. Fidelity anticipates	See response to comment 203-15.

			additional activity in the Hatch Point area in the future. Fidelity is concerned that the level of oil and gas development in the Big Flat-Hatch Point area has been greatly underestimated by the RFDS, and that the level of impacts to other resources that may result within as few as seven years may exceed the level of impacts analyzed in the DRMP. The DRMP was developed without use of the most recent data and/or with input from oil and gas lease holders. The use of 1995 data drawn from the USGS National Assessment of United States Oil and gas Resources to provide the basis for oil and gas activity for the Paradox Basin (p.3-43) has resulted in a substantial underestimation of oil and gas exploration/development in this area. Recent and proposed activity levels in the Big Flat-Hatch Point area, planned infill operation, or possible development of unconventional wells using new technology were not considered in the description of the existing environment in the DRMP. Thus, the analysis of future impacts that may result from oil and gas activity is critically flawed	
Fidelity Exploration and Production Co.	221	10	RFD guidance issued on January 23, 2004, states that an RFDS is not a planning decision, partially because it is speculative to project oil and gas activity fat into the future. In 2004, the BLM issued an Instruction Memorandum (IM 2004-089) to provide clarification of the use of RFDS in planning. The IM states, and the DRMP should reflect, that exceeding the number of projected wells may not result in exceeding the predicted level of associated environmental effects. Further, it states that mitigation of environmental effects through successful reclamation can percent the level of impacts from substantially exceeding the analyzed impacts. The DRMP states that about 10 years may be required for reclamation to be successful (p.4-7)	See response to comment 214-28.

			Fidelity disagrees with a blanket 10-year reclamation period. BLM has not provided any data substantiating this conclusion. While 10 years for successful reclamation may be appropriate for some areas of the Moab planning area, two to three years would be sufficient in other areas (e.g. grassy regions.)	
Fidelity Exploration and Production Co.	221	11	The BLM does not clearly associate possible resource management decision in the text with the maps	No specific comments are provided which can be evaluated.
Fidelity Exploration and Production Co.	221	12	Map 2-5-B Fidelity does not understand with certainty what resource protective measures would be taken under alternative B that would preclude surface occupancy along the Highway 313 corridor, bit it surmises that it relates to visual resource protection. The NSO constraint must be explained for this alternative because VRM II (Visutal Resource Management) assignment would not preclude occupancy. Fidelity is actively seeking options for beneficial use of natural gas that may be produced in association with oil on Big Flat. To that end, Fidelity objects to any management of the Gold Bar area with wilderness characteristics that would disallow issuance of a right-of-way (ROW) that may be required to permit the installation of a natural gas pipeline	The text on pg. 2-52 of the DRMP/EIS states under Alt B "scenic driving corridors would be designated as VRM Class II within a specified viewshed not to exceed 1 mile from centerline. Apply a no surface occupancy stipulation for oil and gas leasing and preclude other surface distrubing activities (see Appendix C) within 1 mile of scenic corridors." In addition this restriction is explained in Appendix C on pg. C-9. Gold Bar is managed for wilderness characteristics only in Alt B.
Fidelity Exploration and Production Co.	221	13	Preferred Alternative C specifies a 0.6-mile buffer around all Gunnison Sage Grouse leks within approximately 175,727 acres of potential habitat, and a 0.5-mile buffer around all Greater Sage grouse leks within approximately 3,068 acres of habitat. These buffers are excessive. Normal practice throughout the Intermountain West is 0.25-mile buffers around leks, which is supported by research data and should be the same in the final RMP.	See response to comments 203-40, 203-41 and 203-42.

Fidelity Exploration and Production Co.	221	14	Preferred Alternative C specifies that timing limitations would apply from March 20th to May 15th each year in the potential habitat for Gunnison Sage Grouse. Also, timing limitations would apply from March 1st to May 15th each year in the potential habitat for Greater Sage Grouse. The DRMP should instead specify a buffer around actual nesting habitat, as is common practice throughout the Intermountain West, rather than a blanket restriction for the entire potential habitat. The highest concentration of nesting is within two miles of a lek. Therefore, the final RMP should only limit activity within a two-mile buffer around leks in the 175,727 acres of habitat for Gunnison and the 3,068 acres for Great Sage Grouse, rather than a blanket timing restriction in areas that may not have sage grouse. According to a study by R.C. Kaiser, (2006, Recruitment by Greater Sage-Grouse in Association With Natural Gas Development in Western Wyoming, Thesis, University of Wyoming, Laramie, USA), two-mile stipulations are effective in protecting nesting and brood-rearing habitat and preserving breeding behavior.	See response to comment 203-40.
Fidelity Exploration and Production Co.	221	15	The DRMP states: "…if projections used in this impact analysis are significantly exceeded at some time in the future due to a continual increase in oil and gas prices, then the analysis will have to be updated again" (p. 4-3). The BLM should clarify the consequences of an RFDS that does not adequately project the number of wells that may be drilled within a 15-year time frame. Does the BLM mean that the final RMP would require amendment? If so, the BLM should re-examine the projections of future well development now that the DRMP would sufficiently address potential impacts from oil and gas development over 15 future years	See response to comment 214-28.
Fidelity Exploration and Production Co.	221	16	The DRMP states: "Only wells drilled during the first 5 years would be successfully reclaimed over the next 15 years…" (p.4-7). Reclamation following the removal of mature sagebrush and piñon-junipers may require	Based on BLM experience in the area, it can take up to 10 years to fully reestablish vegetative communities. Depending on the vegetation disturbed it could take much less time. BLM objectives are to establish vegatative

			several years before the species composition and succession stage is similar to surrounding areas. Fidelity is aware that sagebrush and piñon-juniper communities are slow growing and may take as long as 25 years for sagebrush and up to 75 years for the piñon-juniper communities to reach maturity. Disturbance to grasslands without the presence piñon-juniper or sagebrush would facilitate reclamation much more quickly, perhaps in as little as five years with the addition of amendments or reclamation procedures that facilitate accelerate vegetative growth. Such practices are amount the best management practices that may be used by Fidelity on a site-specific basis and should be recognized by BLM in the DRMP.	diversity and not a monoculture of grass.
Fidelity Exploration and Production Co.	221	17	The DRMP reads: "For geophysical exploration the assumptions are that reclamation of disturbance would be successful within a scope of 10 years depending on reclamation times related to soils, vegetation, and rainfall…" (p.4-8). The Federal Register notice dated August 18, 2007, allows the approval of geophysical exploration surveys with a categorical exclusion. The assumption that impacts resulting from geophysical exploration surveys would require 10 years for surface reclamation is in error and contradicts the premise of the categorical exclusion that such surveys are, in fact, a casual use operation whose impacts are sufficiently insignificant that they may b approved without an analysis by an environmental assessment or environmental impact statement if no new road construction is involved. In fact, geophysical survey operations primarily require use of the surface, not disturbance of the surface. The BLM should alter its language in addressing impacts that may result from geophysical survey operations to reflect the concept of "usage," where no grading and/o blading of the surface are required. The inaccurate characterization of geophysical survey activities should be corrected	See response to comment 214-6.

			throughout the DRMP, including pages 4-16, 4-83, and all other references to "seismic disturbance."	
Fidelity Exploration and Production Co.	221	18	The DMRP fails to note that the use of alternative drilling technologies, particularly directional/horizontal drilling, typically greatly increases the time required to drill and results in increased emissions from drilling rigs	The analysis in Chapter 4 of the DRMP/EIS could not consider all the potential alternatives for drilling that could result in different drilling times and air emissions. On a land use planning level, the analysis must be made on some general assumptions.
Fidelity Exploration and Production Co.	221	19	Assumptions made to assess impacts should be uniform and consistent throughout the analyses for all resources. The DRMP does not make clear if this assumption was sued throughout the remainder of the document for the analyses of impacts to resources other than air quality. Another assumption states: "The assumptions for reclamation for oil and gas are that 50% of the wells drilled would be productive and 50% would be abandoned and reclaimed and revegetation would be successful" (p.4-7. p. 4-83). Without consistency, impacts to resources from each of the alternative cannot be compared. For example, Table 4.3 displays predicted surface disturbance without considering the 50% P&A assumption.	See response to comment 215-13.
Fidelity Exploration and Production Co.	221	20	The DRMP reads" "Flaring emissions applicable to this analysis were assumed to be primarily NOx and CO" (p.4-17). This assumption is incorrect. Flares are used to dispose of unrecoverable gas emerging concurrently with the crude oil. During flaring, gaseous methane reacts with atmospheric oxygen to form primarily carbon dioxide and water. Other, minor emissions from flaring include unburned hydrocarbons, CO, and other partially burned and altered hydrocarbons (HAP). Flaring operations usually achieve at least 98 percent combustion, such that hydrocarbons and CO emissions amount to less than two percent of the hydrocarbons in the gas stream (U.S. Environmental Protection Agency (EPA). 2005. AP 42, Fifth Edition Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources)	This assumption was based on the Vernal Air Quality modeling. See Trinity and Nicholls 2006 for justification of assumptions.

Fidelity Exploration and Production Co.	221	21	The DRMP reads: "It was assumed that watering of all exposed disturbance areas…would occur as appropriate…a conservative control efficiency of 37%...was assumed…" (p.4-18). This statement is contradicted in the DRMP: "It was also assumed that…50% control of particulate emissions would be obtained by watering" (p.4-16) The DRMP should be corrected to consistently reflect the assumptions actually used in the quantification of impacts	Analysis assumptions relating to control efficiencies have been made consistent within the document and with modeling done for the Vernal FO. The assumptions include a 25% efficiency for watering and a 75% efficiency for graveling of roads. It is assumed that 10% of roads would be watered and 40% of roads would be graveled.
Fidelity Exploration and Production Co.	221	22	Table 1.10 in the DRMP estimates the number of compressors at each RFDS area at 0.063 compressor per well with a minimum of two compressors per RFS area (p.4-27) Compressors are located in areas where natural gas is produced into pipelines. The broad assumption allotting compressors to all RFDS areas may be inaccurate for RFDS areas where the predominate mineral produced is liquid hydrocarbons and/or where no pipelines exist for gas transport out of the area. For example, the Big Flat area currently has no pipelines with which to transport natural gas. Compressors would not be installed in this area unless a pipeline was constructed.	See response to 215-17.
Fidelity Exploration and Production Co.	221	23	Table 4.10 of the DRMP assumes that NSO areas are not open for development (p.4-27). This assumption is used inconsistently throughout the DRMP. On page 4-84, the text reads: "Because the resource underlying SNO-stipulated surfaces are more difficult and costly to extract, developers are less likely to opt to develop…." Fidelity contends that in those areas where geological/reservoir conditions would facilitate production from a horizontal/directional well bore and when economic conditions, including well costs, are favorable, horizontal/directional will be used and would likely be considered for NSO areas. Consideration of horizontal/directional drilling is site specific; to assume, however, that the minerals beneath all NSO areas will not be developed likely underestimates the surface	On pg. 4-27 of the DRMP/EIS it states "for the purpose of analyzing impacts of mineral decisions on the total number of oil and gas wells, BLM lands designated as no surface occupancy were not considered for development. This is an analysis assumption regarding the impact of restrictions on the number of wells. The BLM contends that the other analysis assumption the commentor refers to involving the greater difficulty and cost of drilling areas designated as no surface occupancy is accurate and is not inconsistent with the first assumption.

			disturbance resulting from oil and gas activity over the next 15 years as well as the resultant production	
Fidelity Exploration and Production Co.	221	24	The DRMP reads: "The potential risks associates with oil and gas development include geologic hazards…include seismic activity…" (p.4-61) "Seismic activity" should be replaced with "geophysical survey activity."	The statement referred to by the commentor is accurate and refers to the possiblility of seimic activity in the form of small earthquakes.
Fidelity Exploration and Production Co.	221	25	The DRMP reads: "A total of 370,250 acres would be ROW exclusion areas under Alternative C. An Additional 217,480 acres where surface disturbance activities are limited are avoidance areas for new ROWs" (p.4-67) The proposed restrictions/exclusions of future ROWs under all action alternatives may prevent Fidelity from delivering produced natural gas via pipeline to a distribution system already in place. Moreover, in areas such as Big Flat where oil is the primary produced hydrocarbon, there is no distribution system for associated natural gas. Fidelity may be forced to examine other means of disposal/use for the natural gas if ROWs were not available. Preclusion of the issuance of ROWs may result in a loss of federal or state revenues, or a total los of the productive value of the resource. Preferred Alternative C represents exclusion/restriction areas that comprise over 20% of the planning area. Fidelity has not been provide sufficient information in the text in the form of maps that would allow it to evaluate possible impacts from proposed ROW management to its operations. The DRMP lacks maps that show all areas where ROWs would be excluded and/or avoided. To ascertain the effects of the implementation of the differing management strategies under each alternative, Fidelity must search through several maps describing proposed ACECs, non-Wilderness Study Area (WSA) lands with wilderness characteristics, wildlife habitat, high recreation use areas, scenic driving corridors, etc. Fidelity cannot evaluate the possible impacts to its	See response to comments 203-22, 203-24, and 214-12.

			current and future operations without the inclusion of maps that clearly illustrate the ROW exclusion areas	
Fidelity Exploration and Production Co.	221	26	The DRMP reads: "29,678 acres on split-seate lands, of which 9,617 acres (or 0.5% of all Federally leased lands) would be subject to NSO or closed to leasing" (p.4-87) Fidelity fails to understand how BLM can impose on NSO condition to the surface of a land which it does not own/administer. The minerals may be closed to leasing because on split-estate lands, the management of the mineral resource lies within federal authority. BLM cannot, however, impose conditions on the sue of a surface that is not federal outside of the National Historical Preservation Act and Endangered Species Act	See response to comment 120-98.
Fidelity Exploration and Production Co.	221	27	Under Alternative B, DRMP read: "An estimate of wells foregone is…8 wells in the Big Flat-Hatch Point RFD area…" (p4-94) The area within this RFD where wells would be foregone cannot be determined with certainly from Map 2-24-B: however, to the extent that this area where wells would be foregone overlaps Fidelity's existing leases, the BLM estimate is likely in error. Fidelity will operate pursuant to its valid existing rights	See response to comment 124-4.
Fidelity Exploration and Production Co.	221	28	The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry Phase I-The Uinta Basin Prepared for: Public Land Policy Coordination Office Utah Governor's Office 5110 State Office Building PO Box 141107 Salt Lake City, UT 84114 Prepared by: Bureau of Economic and Business Research University of Utah 1645 East Campus Center Drive	The BLM is aware of this study. In addition, the Moab BLM has been given an advance copy of the study done for Grand County on the same subject. This study was done by the University of Utah for the Public Land Policy Coordination Office. Results from the Grand County study of oil and gas development have been added to chapter 4. See also response to comment 203-25.

			Salt Lake City, UT 84112 November 2007	
Ruby Ranch	264	1	The maps outlining the White Wash "open area" are not in enough detail to make any detailed analysis of your proposals.	The White Wash open area comprises 1,866 acres east of the Ruby Ranch road. It primarily encompasses the sand dunes proper.
Ruby Ranch	264	2	It is very clear that BLM intends to make a large area in White Wash "open" to motorized use. We request that any "open" areas do not directly border our private property and that there is an adequate buffer between our private property and any designated open area. Please include a .25 - .5 mile buffer to minimize the vandalism and destruction of property that has been occuring (fence vandalism-- wires cut, posts used for firewood, gates destroyed-- also property shot at, livestock hassassment, etc). See attached map.	The BLM proposes an open area of fewer than 2,000 acres in White Wash. The open area is primarily the sand dunes themselves. Everywhere else, all travel would be limited to designated routes. The acreage of open area in the PRMP/FEIS has been greatly reduced from the acreage of open area in the No Action (current) alternative. The southwest boundary of the open area has been adjusted to provide a buffer between the open area and the private property to accommodate the commentor.
Ruby Ranch	264	3	It is very clear that BLM intends to make a large area in White Wash "open" to motorized use. Noise level limits should be implemented. We have been kept awake all hours of the night. It disturbs wildlife and livestock as well. Even other motorized recreationists have commented to us on this. Cities and Counties have been using noise level restrictions in areas of OHV use as far back as the 1970s.These should be implented. Is it possible to implement an hour restrictions for the open area? Even if the actifity in the open area as allowed bdetween 6 AM and 11 PM and closed from 11PM to 6 AM, it would be a huge benefit to us and the majority of OHV people who come out here.	Noise level limits on machines are a matter of state law. See response to comment 122-7.
Ruby Ranch	264	4	Please consider making sure there are at least several strategic locations on each BLM grazing permit where there is no OHV use allowed. This would allow cattle that are being harassed to have some areas they could go to escape.	All OHV use outside the Dunes themselves have been limited to designated routes. This would provide cattle with escape from motorized uses.
Ruby Ranch	264	5	We are requesting that the area close to the Ruby Ranch and north of the Ruby Ranch Ranch road , where there are no currently roads or designated trails	The area referred to by the commentor is not within the Dee Pass Motorized Focus Area in Alt C. The area has been limited to designated routes in the PRMP/FEIS. New

			be left closed to OHV use so that livestock and wildlife have a safety zone.	route construction would be minimized in this area because it is not within a focus area intended to provide for such uses. Any new route authorized in this area would be required to undergo site specific NEPA analysis. The Dee Pass Motorized Focus Area was drawn to specifically exclude the area to the north of the commentor's property.
Ruby Ranch	264	6	White Wash and Salt Wash are definitely riparian zones. They are acknowledged as such in the EIS for the Ruby Ranch Allotment. However, it seems that this fact is minimized in the Moab RMP. In section 4.3.11.2, page 4-241, it states that "stipulations require that no surface disturbing activities within 100 meters of riparian areas". In many other areas of the Moab RMP, it highlights and emphasizes the fact that the riparian areas within the Moab RMP area are both rare, unique and should be protected. They are in fact critical zones for watersheds, veg and wildlife, but in the past 20 years, White Wash has been horribly desecrated and Salt Wash is showing significant damage form OHVs.	The BLM acknowledges that motorized travel in washes can impact riparian values. By limiting travel to designated routes, many washes will be spared motorized travel. There are some washes, however, that would be designated for motorized travel in the Travel Plan.
Ruby Ranch	264	7	On pages 2-37 of the RMP it talks about how permits for motorized recreational use may be required if monitoring indicates long-term damage. Overwhelming long-term damage by OHV use has already been documented in the EIS for the Ruby Ranch Allotment. Permits should definitely be required for motorized use in high impact areas, especially riparian zones.	The statement referred to by the commentor applies to Ten Mile Wash. Within Ten Mile Wash, motorized travel is limited to the marked, designated route. The statement on pg. 2-37 of the DRMP/EIS means that if there were continued use off the Ten Mile route, permits for this one route could then be required.
Ruby Ranch	264	8	I would suggest closing the upper portion of White Wash to all motorized use.	The commentor provides no specific evidence as to why the upper portion of White Wash should be closed, nor is the "upper portion" of White Wash defined.
Ruby Ranch	264	9	There are many roads and trails that have been created in these areas in the last 20 years. Many of the roads and trails have been included in BLM planning and have been included on the Moab BLM planning maps. Many of these roads and trails were created in violation of BLM policy. Many were included in the inventory after	The BLM acknowledges that the singletrack motorcycle routes included in the DRMP/EIS analysis were user made. Those that were made in "open" areas were not in violation of any law. Those that were made in "limited" areas may have been in violation, but it is difficult to prove what was "existing" prior to 1985, which was the

			someone on an OHV logged their favorite trails on a GPS and brought them into the Moab FO. Have these newly constructed roads and trails has to undergo any significant scrutiny?	timeframe of the RMP which limited travel to existing routes in some areas of the Moab planning area. This difficulty is one reason why the current plan revision does not propose that any area be limited to existing roads -- all routes in the travel plan are to be limited to mapped, designated routes. Appendix G explains the Travel Plan process. County-submitted route data was verified by BLM using random sampling techniques. All route data submitted by the public was verified on the ground by BLM staff. Those routes that actually existed on the ground were considered in the Travel Plan formulation. Those routes that presented resource conflicts (those resources are listed in Appendix G) were not designated in one or more alternatives. Thus, the BLM provided scrutiny" regarding those routes that are to be designated in the Travel Plan accompanying the PRMP/FEIS. After the Record of Decision, all new routes must undergo a case by case NEPA analysis. Travel off those routes designated in the Travel Plan will be illegal. The legal routes will be known, mapped and incontrovertable.
Red River Canoe Company	283	1	The 90-day comment period was entirely too brief to allow the average public time to peruse the draft RMP.	See response to comment 124-1.
Red River Canoe Company	283	2	Many routes on the travel plan map (Alt C) run within a half-mile or less from one another and arrive at the same destination. (See areas north of Dead Horse Point S.P., Mineral Point, Gemini Bridges area, Black Ridge, and Canyon Rims for instance) This cannot possibly be a defined purpose and need (as required by the BLM instruction memoranda on designating routes) for each of these redundant routes. If there is a low purpose and need for a route, even if there are no resource conflicts present, the routes need to be taken out. Its mere existence is not grounds for designation. A	A purpose and need was identified for each road not eliminated from Alt. C. Oftentimes, this determination was made by seeing that the route had been used for travel within the past time frame. Adjustments to the travel plan can be made a later date, should it be demonstrated the route is not in use.

			purpose and need must be present.	
Red River Canoe Company	283	3	While travel-planning looks at impacts generated by each individual route segment, the cumulative impact of a 3,693-mile route network (alt C) is not addressed. Even though the impact of road construction already exists out there, BLM is not taking into account the additional and probably impacts of people traveling off-trail (there are countless incidences of this), nor the benefit to wildlife, soils, and habitat of allowing currently constructed roads to reclaim themselves.	Off route travel constitutes illegal activity, and is not the focus of the analysis of the RMP. The BLM has removed over 2500 miles of routes for the reasons mentioned by the commentor.
Red River Canoe Company	283	4	BLM mandates state that new route construction must first go through rigorous environmental assessments before construction may begin. Why is that existing routes never underwent such assessments and never will? This is an inconsistency in management regulations, to the detriment of uninventoried resources.	Routes that were constructed prior to FLPMA (1976) were not subject to NEPA analysis.
Red River Canoe Company	283	5	Routes to the Labyrinth Canyon area also conflicts with current river management and use. The Price FO wrote the plan for the river and found it to have Wild and Scenic values, but such values are blatantly ignored by the Moab FO which plans to designate routes along the river, from Mineral Bottom upstream. Nothing precludes motorized recreationalists from camping on the river – a direct conflict with existing river use – and motorists aren't required to follow the same rules as river users (like using fire pans, hauling out trash, collecting human waste, etc).	Should vehicle camping along the Green River be deemed a resource conflict, this type of camping can be curtailed without a plan amendment being required. The instances of camping use from the Mineral Bottom boat ramp upstream to Hell Roaring Canyon are not common, nor has a conflict been reported to the BLM from this type of activity.
Red River Canoe Company	283	6	On the subject of local business, BLM makes blanket assumptions about the economic impacts of its plan (i.e. that motorized access and extractive industry opportunities will enhance Moab's economy) with no study to back up these postulations. In fact, in looking at the NVUM data, more motorized use and extractive industry will drive away the bulk of Moab's visitors who come here for a quiet, natural experience. As BLM turns more backcountry areas into front country managed recreation sites (alt C creates five new campgrounds in	See response to comments 124-2, 124-133 and 124-134.

			areas farther a field than current sites), visitors are setting up camp and recreating farther away from Moab and are less likely to even come into town and spend money. Everyone from restaurants to retail shops to gas stations will be affected.	
Lisbon Valley Mining Co	286	1	The draft RMP documents coordination with adjoining RMP's including Vernal, Grand Junction, Uncompahgre, Dolores, and Price Fos (BLM 1985b, 1985c,1985d, 1987, 1989a, 1993a). These documents were developed in the 1980's and early 1990's. It is difficult to tell whether these reviews included newer mineral development and recent commodity price increases.	The Mineral Potential Report and the Reasonably Foreseeable Development Scenario were prepared for the current planning effort. These two reports were done in conjunction with the Utah Geological Survey, and are dated 2005.
Lisbon Valley Mining Co	286	2	Scoping appears top emphasize environmental protection over the intended multiple use concepts mandated by FLPMA. Example- BLM asks for "nominations for Areas of Critical Environmental Concern (ACEC's) and nominations for rivers for potential inclusion in the National Wild and Senic Rivers System. No where in the process is there similar opportunity to nominate or designate mineral areas or mining districts." One example is the overlapping development potential for lacatable minerals (copper, uranium, and limestone) and oil & gas in Lisbon Valley.	The Mineral Potential Report (2005) prepared for the Moab RMP details the mineral potential of the planning area. This report was done in conjunction with the Utah Geological Survey.
Lisbon Valley Mining Co	286	3	How has Critical Issue #2. (What areas will be available for mineral development, and what restrictions should be imposed?) Related to mineral development in the draft RMP been evaluated?	The Utah Geological Survey assisted in the preparation of the Mineral Potential Report and the Reasonably Foreseeable Development Scenario. These reports were prepared in 2005 for the Moab RMP revision effort. Both of these reports are available on the Moab RMP Internet site. Hard copies of these reports are also available on request.
Lisbon Valley Mining Co	286	4	The RMP references three EIS's within the Moab Field Office Area that were developed as part of planned economic development. This tends to skew results, management and recommendations towards the preservation of environmental and wilderness characteristics.	Socioeconomic Baseline Report for Grand County and a Socioeocnomic Baseline Report for San Juan County were prepared specifically for the current planning effort. These reports were prepared in 2004; they are available on the Moab RMP Internet site, as well as by request.

Lisbon Valley Mining Co	286	5	The Minerals Section of Chapter 3 covers 22 pages of data on the minerals in the Moab FO Area. This section appears comprehensive and well documented. The mineral potential is clearly significant when compared to other resource descriptions, yet other disciplines appear to receive a higher ranking of importance with management.	The Minerals Section of Chapter 3 represents a summary of the information found in the background documents concerning minerals -- the Mineral Potential Report and the Reasonably Foreseeable Development Scenario. The "minerals discipline" has received much attention in this RMP.
Lisbon Valley Mining Co	286	6	In the assumption used for mineral development (Section 4.1.3) there is discussion of the fact that the Oil and Gas section needed to be revised due to escalating prices due to demand. However, there is no similar consideration for minerals. If you look at the prices and projections for the demand of copper, uranium, gold, aggregate, and other minerals, the demand world wide is expected to increase and warrents greater expansion consideration than what was presented in the Draft RMP. If you look at copper alone, the permitting of Lisbon Valley was done when copper prices were around $0.70/pound. Current prices are more than 4 times greater than in 1996. The BLM should provide the back-up for their projections (especially prices and projected acreage). These estimates should be a function of geology, reported reserves, and prices.	The BLM is aware of the fact that minerals prices have risen over the past year. However, the commensurate contribution of hard rock minerals to the economic analysis in the RMP remains stable. Furthermore, copper, uranium and gold are all locatable minerals. The RMP makes no decisions regarding locatable minerals.
Lisbon Valley Mining Co	286	7	The Draft RMP tends to project "adverse impacts" to mineral development, including "unquantifiable risk" to cultural resources. It fails to balance this with the favorable impacts. Aside from economic benefits to both private and public sectors, mineral development expends greater resources to study the affected environment. Modern mineral development provides a vast amlount of environmental information. This leads to a better understanding of a particular area/discipline, and provides the framework for land use management. Not all impacts from mineral development are adverse. BLM has worked closely with LVMC to mitigate environmenal impacts in Lisbon Valley. Specific favorable impacts include detailed hydrologic studies,	The land use plan analyzes activities on a broad, landscape level. The actions mentioned by the commentor have been developed on a site specific, project level. The BLM does not deny the contribution of such mitigating actions by mineral development companies.

			geochemical studies, and comprehensive cultural studies. Hydrologic work has served to characertize groundwater occurrence, quality and movement in an area previously devoid of comprehensive technical information. Geochemical studies address soil conditions and potential amendments necessary to reclaim rangeland to higher standards. Wildlife mitigation includes rangeland rehabilitation, surface water harvesting and spring rehabilitation plans with specific objectives to offset the impacts of ongoing drought. Cultural work includes detailed inventories of cultural resources, and comprehensive synthesis of Prehistoric Archaeology. These collaborative efforts are clearly favorable impacts of mineral development.	
Lisbon Valley Mining Co	286	8	The seperation of mineral impacts with other geologically related resources (i.e., paleontological resources) is erroneous, as they are related. Pitting one discipline against another is wrong in this instance. As stated earlier, the ability to gather information as part of a proposed development project affords the best ability to obtain data for management decisions.	The RMP analyzes the impacts of decisions concerning one discipline with the effects upon another discipline. There is no attempt to "pit" disciplines against one another. The site-specific instances mentioned by the commentor are mitigations developed at the project level. They are not analyzed in the RMP process.
Lisbon Valley Mining Co	286	9	The evaluation and designation of ACEC's is a one-sided look at impacts. In the Draft RMP, the BLM has looked at development impacts on ACEC's. In the case of mineral and other resource development, ACEC's could adversly impact potential resource development adjacent to ACEC's. As such, it appears the BLM would intend to place greater restrictions on the proposed development.	The preferred alternative manages 63,000 acres in five ACECs. There are restrictions placed on leasable and saleable minerals (but not locatable minerals) in these areas. The effects of restrictions on minerals in these 63,000 acres are disclosed in Chapter 4 of the DRMP/EIS.
International Adventure Tours	287	1	Installing fences around the cottonwood trees and “water sources” at the White Wash Sand Dunes is impractical and not necessary and will only add unnecessary costs. It has been our experience that the public at large are interested in being responsible users. Therefore, making it an educational matter seems more relevant – install a marker/sign indicating the value of protecting the trees and water sources would be as	See response to comments 208-3 and 479-6.

			effective both in purpose and cost.	
International Adventure Tours	287	2	The open area at White Wash in Alt C and D must be expanded.	See response to comment 123-35.
International Adventure Tours	287	3	We would like to see BLM seek answers through a more active effort to involve these resources [various interest groups] rather than closing use due to BLM's inability to provide the needed resources to keep the land open and appropriately managed.	Involving interest groups and volunteers does not require a planning decision. BLM is required to keep lands open to cross country travel only when there are no resources at risk. Vegetation, cultural resources, wildlife habitat and other natural resources are generally at risk when cross country travel is allowed.
International Adventure Tours	287	4	There has to be other answers or solutions that do not exclude the greater majority of the users that the proposed alternatives do. We ask that you reconsider alternatives outside of the ones proposed that will allow broader multiple user access.	There are over 3,000 miles of route open to travel in the preferred alternative. Almost all lands within the Moab Field Office are readily accessible by motorized travel. The commentor offers no specifics as to the "broader multiple use" being referred to.
Delta Petroleum Corporation	306	1	Alternatives B and C in their present forms, fail to satisfy direction, mandates, and principles articulated in the Energy Act of 2000, the Energy Policy Act of 2005 and Executive Orders 12898 and 13211. Alternatives B and C do not adequately represent a balance between conservation, resource development and other multiple uses and would severely impact and limit growth of the economy within this region. If implemented, Alternative B and C would also significantly restrict oil and natural gas development throughout the planning area due to overly burdensome and unnecessary land use restrictions.	See response to comment 210-2.
Delta Petroleum Corporation	306	2	The BLM is mandated under FLPMA to encourage multiple uses of federal land. The multiple uses are not mutually exclusive and can co-exist in a number of ways. With appropriate planning, mitigation, and management of impacts, the BLM can allow these uses to occur in ways that conserve and protect the environment for the enjoyment, use, and benefit of all and future generations.	See response to comment 121-1.
Delta	306	3	The multiple use mandate can achieve a diversification	The economic benefits of oil and gas development have

Petroleum Corporation			and expansion of the local economies. Encouraging resource development and all the other myriad uses that may be undertaken on public lands should be paramount concerns of the BLM. The result will be stable local economies and potentially bright futures for the residents of these communities and the country. The BLM needs to recognize within the RMP that the balancing of multiple uses must still provide for economic growth and stability in the planning area and not overly restrict those uses in favor of ones that limit or eliminate the few economic opportunities that exist for residents of the MRA.	been fully disclosed in the DRMP/EIS on pgs. 4-259 through 4-265.
Delta Petroleum Corporation	306	4	The BLM should not consider the description provided for in alternatives B and C since they do not accurately portray what is included in each alternative. Under NEPA a no action alternative is included to establish a basis for evaluating impacts from changes to the existing management plan.	The commentor has not provided any information on how the descriptions of the alternatives are not an accurate portrayal.
Delta Petroleum Corporation	306	5	We do not believe that the full economic impact of Alternative C was adequately considered, particularly with respect to both resource development and motorized recreation.	The commentor has not provided any infomration regarding the inadequacy of the economic impacts discussed in Chapter 4 of the DRMP/EIS.
Delta Petroleum Corporation	306	6	The economic analysis presented in the DEIS is based on old and outdated information with respect to oil and gas development. It relies on data from 2003 and older. The economic picture, development activities and approaches to resource extraction have undergone a major shift in the last 7 years based on several factors including demand for energy resources, federal policy and legislation and rises in energy costs. It is critical that the DEIS depend on the best and most recent data available. The analysis on oil and gas resources does not rely on available recent data, but primarily on information prior to 2004 which does not reflect changes in the economy, need to increase domestic supplies of energy, impacts of high energy costs on	See response to comment 220-1. Additional data has been added to Chapter 4 of the PRMP/FEIS pertaining to oil and gas employment, potential impacts to State revenues from oil and gas restrictions, information on property taxes and information on severance taxes. On pgs. 4-259 through 4-265

			communities and federal resource priorities from the Energy Policy Act of 2005. That information is readily available from both State and Federal sources, including some information in 2007, yet none of this recent information has been included in the DEIS. This is a major flaw under NEPA, since readily available information should be used for decision-making. This affects economic impacts and projections within all of the alternatives. Since this information is readily available, the BLM should amend the DEIS to reflect that information. A decision that affects land uses for the next 15-20 years should not be based on faulty assumptions and old information.	
Delta Petroleum Corporation	306	7	Alternative C contains five Areas of Critical Environmental Concern (ACEC) that do not seem to have adequate justification for closure to development. Twelve of the fourteen ACECs already have existing leases. While the ACEC has been identified the information used to determine the need for the ACEC and the area to include in it has not been provided and is required by NEPA.	See response to comment 203-9 and 203-10.
Delta Petroleum Corporation	306	8	Analysis of risk versus multiple use is not present in the DEIS, so there is no way to evaluate how the BLM can reach the land restrictions proposed for the ACEC's. In addition, there are a number of existing laws, regulations and policies to protect the water, air, cultural, and other resources identified in the ACECs. In what appears to be a failure to meet regulatory requirements, the RMP contains little in the way of explaining to the public how the BLM reached the designations and proposed land restrictions.	See response to comment 203-13.
Delta Petroleum Corporation	306	9	Several of the proposed ACECs overlie existing utility corridors within the MRA. The existing and future use of these utility corridors needs to be recognized and protected within any new designation of an ACEC. This is particularly true for the proposed Upper Courthouse, Wilson Arch, Cisco White Tailed Prairie Dog Complex,	None of the ACECs identified by the commentor are within the Proposed Alternative. There is not a conflict with the utility corridor identified for the Proposed Alternative in the PRMP/FEIS.

			and Colorado River Corridor ACECs.	
Delta Petroleum Corporation	306	10	The DEIS uses an estimate of 15 acres per well for impact analysis. However, in other recent RMP's a 5 acre estimate is used. The basis for using a figure 3 times larger than used in other RMP's has not been provided. The impact analysis should reflect a 5 acre impact as used elsewhere by the BLM or a justification should be provided in the DEIS for the need of a policy change for this MRA.	See response to comment 203-38.
Delta Petroleum Corporation	306	11	There is ongoing reclamation of impacts from exploration and development. This is often required within site specific lease stipulations and should be recognized in the DEIS.	On pg. 4-83 of the DRMP/EIS it states that revegetation will be successful within a scope of 10 years (for oil and gas development).
Delta Petroleum Corporation	306	12	The Energy Policy Act of 2005 and Executive Orders 12898 and 13211, asked that the BLM identify and remove roadblocks to energy development on federal lands.	See response to comment 210-2.
Delta Petroleum Corporation	306	13	On September 28, 2007, the Utah BLM canceled its November 13th lease sale covering 141,717 acres. The financial impact of this cancellation can be measured by taking the average price per acre paid at the previous lease sale of August 21, 2007 of $31 per acre times 141,717 acres to be sold. The projected value of this sale would have been over $4,500,000. However, that number does not take into account lost wages, royalty payments, taxes and other economic benefits related to production from that acreage. Nor does it take into account the shift in trade balance from domestic production versus foreign importing of oil and gas resources. These are important considerations that must be included within the economic analysis for this DEIS.	This action does not pertain to the current land use planning process. See also response to comment 220-3.
Delta Petroleum Corporation	306	14	The economic value of proposed land restrictions must be evaluated for both economic losses and penalties to the resource industry as well as the economic value produced by protections to those lands ecological or	See response to comment 220-3.

			other perceived benefits. Economic impacts occur both from lost extraction as well as ecological and social benefits. The value of a pristine vista must be weighted against the temporary impact to that vista from oil and gas development in implementing land use restrictions. It is not an either or decision, nor an irrevocable commitment of resources in this case. A true valuation of both sides of the equation is needed to reach a truly balanced decision on how to administer multiple land use policies. Such evaluations and consideration shave not been presented within the DEIS. The BLM has not presented a rationale for reaching a balance as claimed in alternative C.	
Slate River Resources	312	1	We believe the lands in Townships 16 South, Ranges 24 and 25 east should not be designated as lands with wilderness characteristics, but should be left in multi-use designation. I have enclosed a plat that shows the number of existing wells in the area of Sections 2-4 and 6-T16S-R25E and Sections 9 and 10-T16S-R24E. *See attached map.	These lands (in the Hell's Hole area) are not designated as lands with wilderness characteristics in the preferred alterantive.
Slate River Resources	312	2	In addition to the well activity, Monument Ridge Road runs through these sections eventually connecting with Seep Ridge road. This is a major agricultural and oil field access between Vernal and Fruita.	Hell's Hole is not designated to be managed to protect its wilderness characteristics in the preferred alternative.
Dolar Energy	423	1	The Reasonable Foreseeable Development (RFD) scenario for oil and natural gas development within the planning area is inadequate. The Alternative C (which is the preferred alternative) projects 435 wells in the next 15 years. I believe this to be far below the levels that should be anticipated.	See response to comment 214-1.
Dolar Energy	423	2	With respect to oil and gas resources, BLM Manual 1624, Planning for Fluid Minerals, specifically directs BLM not only to identify which areas would be subject to different categories of restrictions as included in the DRMP/EIS, but also to show that the least restrictive lease stipulation that would offer adequate protection of a resource has been selected. BLM failed to provide	See response to comment 214-9.

			this critically important analysis in the planning document. This omission is of critical concern because it demonstrates that BLM has not carefully considered the effect of restrictive lease stipulations or permit conditions of approval (COA) on current and project future oil and gas activities in the area. Given the fact that the plan will be used to make future decisions on activities, this lack of analysis is a fatal flaw.	
Dolar Energy	423	3	Alternative B is very restrictive for human use, and I am very concerned about the proposal to manage so-called "non-Wilderness Study Area (WSA) lands with wilderness characteristics" to maintain wilderness. There is no justification and no mandate in the Federal Land Policy and Management Act (FLPMA) and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the "603 Process" was completed, the agency was done with its Wilderness Review. The question of which lands should be included in the National Wilderness Preservation System will be a decision of Congress. Other than the management of existing WSAs, the BLM should have no part of this issue. To do so would obviate that FLPMA mandate, USC § 1702 (c) ("Section 103(c)"), of multiple use and result in a loss of economic development in the local community and a denial of energy resources for the state and nation.	See response to comments 214-17, 214-18, 214-19, 120-8 and 121-10.
Dolar Energy	423	4	In the Moab DRMP/EIS, the BLM has failed to adequately consider reasonable access to federal and private minerals and to consider the effects its proposed management strategy will have on current and future oil and gas exploration and development activities, and on the rural economy. A recent study by the University of Utah's Bureau of Economic and Business Research found that the oil and gas industry provides for jobs that receive wages 86% higher than the average wage for recreation jobs. Artificially limiting energy development in the Moab Planning Area will deny the local economy	See response to comment 203-25.

			of similar benefits. The Moab BLM also must take into consideration the loss of income the state of Utah is denied from rental payments, royalties, and taxes that industry and business provide, that are lost when lands are locked away.	
Dolar Energy	423	5	I would also suggest the BLM sell No Surface Occupancy leases rather than lock up areas with no leasing opportunities. Future technology may allow the ability to reach minerals to develop them without disturbing the surface.	The preferred alternative uses the "no surface occupancy" restriction (rather than closed) wherever possible to protect resources. The only discretionary areas that are closed to leasing in the Preferred alternative (25,306 acres) are those that are further than one mile from lands on which occupancy can occur. The DRMP/EIS specifically states (on pg. 2-15) that "should technology change, a Plan Amendment would be initiated to place these 25,306 acres under an NSO stipulation for oil and gas leasing.".
Intrepid Potash	435	1	In the Moab DRMP/EIS, the BLM has failed to adequately consider reasonable access to federal and private mineral resources and to consider the effects its proposed management strategy will have on current and future mineral exploration and development activities, and on the rural economy. Artificially limiting mineral development in the Moab Planning Area will deny the local economy of substantial economic benefits.	Access to federal minerals has been considered throughout the RMP process. The impacts of restrictions on mineral activity to mineral production are outlined in Chapter 4 of the DRMP/EIS in Section 4.3.7. The economic benefits of mineral development are analyzed in Chapter 4 of the DRMP/EIS and are detailed in Section 4.3.12.2.7. The contribution of mineral development in the economy of the Moab Planning area has been studied by the University of Utah. The BLM has also incorporated data from its study, "The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry: Phase III - Grand County." This recent study (January, 2008), commissioned by the State of Utah, confirms the relatively minor contribution that minerals development makes to the planning area's economy.
Intrepid Potash	435	2	There is no justification and no mandate in the Federal Land Policy and Management Act (FLPMA) and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the "603 Process" was completed, the agency was done with its Wilderness Review. The question of which lands should	See response to comments 120-8 and 121-10.

			be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so would obviate the FLPMA mandate, USC § 1702 (c) ("Section 103(c)"), of multiple use and result in a loss of economic development in the local community and a denial of mineral resources for the state and nation.	
Intrepid Potash	435	3	The designation of areas within the Cane Creek Known Potash Leasing Area ("KPLA") as Closed or Open Subject to No Surfance Occupancy in the DRMP/EIS will unnecessarily limit the development of potash resources within the Cane Creek KPLA and within the Moab Planning Area as a whole. According to the DRMP/EIS, the analysis of "Open Subject to No Surface Occupancy" stipulations "assumes that development and production of the underlying mineral resources are administratively available by directional drilling from outside the area." Although some mineral resources may be efficiently extracted with directional drilling, directional drilling may not always be possible or feasible. Some "Open Subject to No Surface Occupancy" designation within the Cane Creek KPLA could effectively close the designated areas to potash exploration and development. Cane Creek KPLA is the most significant of the three existing KPLAs in the Moab Planning Area, and the site of the only commercial production of potash in the Moab Planning Area. Notwithstanding the fact that it is the largest KPLA, Cane Creek KPLA covers a very small percentage of the Moab Planning Area. Closing portions of the Cane Creek KPLA to the development of potash resources through the imposition of either "Closed or "Open Subject to No Surfact Occupancy" restrictions would provide little over all benefit to the	Valid existing rights are not affected by the current planning effort. See response to comment 214-4. New leases would be subject to the restrictions imposed in the PRMP/FEIS. The Cane Creek Known Potash Leasing Area is partially open to leasing with no surface occupancy. It is true that the mineral resources in these areas would only be available by directional drilling. The areas in the KPLA that are closed are within the Behind the Rocks WSA and have been closed since that WSA was established. The determination has been made in the DRMP/EIS that the other values in the area outweigh the value of the mineral resource.

			Moab Planning Area, while effectively stifling the only viable commercial potash production within the Moab Planning Area. Regarding the Cane Creek KPLA, the agency should implement the Oil and Gas Leasing Stipulations set forth in Alternatives A or D.	
Intrepid Potash	435	4	The DRMP/EIS contemplates the establishment of several Areas of Critical Environmental Concern "ACEC" which encompass portions of the Cane Creek KPLA. Only a very small portion of the MPA contains workable potash deposits, the most significant of which are located in the Cane Creek KPLA. Restrictions on potash mining attendant to the establishment of ACECs could significantly limit the exploration for and development of potash resources within the Cane Creek KPLA. The agency should designate any ACECs in or near the Cane Creek KPLA in a manner that does not substantially interfere with the extraction of potash.	The Shafer Basin/Highway 279/Long Canyon ACEC partially overlays the Cane Creek KPLA. This ACEC is established to protect the scenic values of the area, including the views from Dead Horse Point State Park, as well as wildlife values. Restrictions on potash mining were considered in the designation of this ACEC; the relevant and important values of the ACEC were deemed to be more important than the potash deposits.
Intrepid Potash	435	5	Under Alternatives B and C of the DRMP/EIS, portions of the Cane Creek KPLA are designated as VRM I and II. As noted in the DRMP/EIS, "designation of an area as VRM Class I essentially closes the area to mineral resource activity" and "meeting VRM Class II objectives imposes additional costs on mineral resource developers." Exploration for and development of potash deposits are valid and important uses of the area within the Cane Creek KPLA. The Visual Resource management designations proposed in Alternatives B and C will significantly limit the development of the largest and most viable KPLA in the MPA.	See response to comment 214-4 for the issue of valid existing rights. Any rights currently held in the KPLA would not be affected by the PRMP/FEIS. VRM restrictions in the area of the Cane Creek KPLA were imposed to protect the scenic values of the area. The visual resources of the area are of importance nationally and internationally, and VRM restriction have been imposed in this RMP to protect those important values.
	637	1	Trail segments that should be included: Flat Iron Mesa – From about 4346450 N 636300 E heading NW to the pipeline road. From about 4345600 N 634700 E going SW to Plan trail 2. From 4246200 N 633400 E going SW to the county B road 4. From about 4242400 N 633400 E south then east to the plan road.	See response to comment 206-17.
	637	2	Trail segments that should be included: Strike Ravine – A portion of the "Big Ugly" hill at about	The Strike Ravine Jeep Safari route in its entirety is in all travel plan alternatives.

			4254500 N 636600 E. The north-to-south section accessing and traversing the property purchased by Kiley Miller (note: San Juan County has continuously supported this right of way in claim court).	
	637	3	Trail segments that should be included: 3-D Trail – From about 4285900 N 609900 E north then west to 4286400 N 609300 E	See response to comment 206-11.
Union Telephone Company	751	1	In the Final EIS and revised RMP, The BLM should continue to leave most of the Moab Resource Area open for wireless communications infrastructure. Specifically, the BLM should adopt Alternative A or Alternative D because they would allow the siting of wireless communications infrastructure on a large percentage of BLM-administered land, while adopting fewer restrictions on the types o f uses and facilities.	Any application filed for establishment of a new communication site wiould be evaluated on a case-by-case basis. Generally, communication sites require locations with a high elevation for site distance, adequate access, and a power source. Where the infrastructure is not already present, these needs must be considered as part of the project that is analyzed through the NEPA process. The resources identified for protection in Alternatives B and C may be a factor in decisions affecting new communication sites regardless of which plan alternative is selected.
Holiday Expeditions	980	1	I would like BLM to consider designating some buffer zones next to the quality lands that should exist along the borders of State and National Parks. These buffer zones would guard against the pollution of sight, smell, and noise that are going to exist on certain BLM lands. Also, BLM should provide buffer zones along the Green River and the undeveloped lands that are left next to the Colorado and Dolores Rivers in the Moab District.	The preferred alternative manages lands along the Green, Colorado and Dolores rivers as no surface occupancy for oil and gas development as well as all other surface disturbing activities. A no surface occupancy stipulation has also been placed on BLM lands surrounding Dead Horse Point State Park. In addition, a VRM II designation has been placed along the border of Arches National Park.

GOVERNMENT				
Organization	Record ID & Comment Number		Comment Text	Response to Comment
Arches National Park	8	1	In Section 3.2, Table 3.2 of the draft RMP/EIS, there are only ozone concentrations for La Plata County and Mesa Verde National Park in Colorado included, though ozone has been monitored at Canyonlands National Park for a number of years and is considerably nearer the area of interest. Those data shouuld be included in the EIS, as well. NPS data shows a deteriorating trend for ozone, which may reflect more current data than that used for the RMP. Data for 2005 are available at www2.nature.nps.gov/air/monitoring/ads/ADSReport.cfm.	This data has been added to applicable table in Chapter 3 of the PRMP/FEIS.
Arches National Park	8	2	The oil and gas leasing maps for Alternatives B, C, and D (Maps 2-5-B, C, and D) show some land as open to leasing in Arches NP (No Surface Occupancy), along the southwest boundary of the park adjoining highway 191. We believe this is an error and should be deleted.	The oil and gas leasing maps are in error in showing a portion of the park open to leasing with no surface occupancy. These maps have been corrected in the PRMP/FEIS.
Arches National Park	8	3	Map 2-6 shows a Known Potash Leasing Area adjacent to the southwest corner of Arches NP, and possibly jutting slightly across the boundary into the park. We assume that this designation is not the same as an actual lease, which is shown in a different color on the map. If this KPLA does indeed cross into the park, and it is possible to remove the designation inside the park boundary, we would request that this change be made.	The Known Potash Leasing Area is a classification that delineates where there are known potash resources that can be economically recovered. However, area included in the National Park is closed to leasing and will never be developed. This classification was made prior to the establishment of the Park and can not be easily modified.
Arches National Park	8	4	The plan states (page 2-48) "Any routes that are not baseline would be signed "closed" on the ground. " Since this suggest that anything not signed "closed" would be considered open, which could be an incentive for removal of "closed" signs, we would prefer a policy of signing roads as open and if not signed, roads are closed.	The BLM will use a combination of "closed" and "open" signing, along with a required Travel Plan map, to inform the public of which routes are designated for travel.

Arches National Park	8	5	Several roads are shown within Arches NP that are not park roads. These are circled on the attached map;please delete them. Alternately, since the RMP does not apply to Arches, we would prefer that the park simply be shown as a "blank spot" on the map, with all roads removed.	All routes within Arches National Park have been deleted from the Travel Plan maps accompanying the PRMP/FEIS.
Arches National Park	8	6	Various routes or spurs that approach Arches (Salt Valley, Yellow Cat, Lost Spring Canyon and Cache Valley/Dry Mesa areas) are shown as class D roads in alternative C but not in alternative B. We would prefer, as in alternative B, that these routes not be designated roads.	The desire of Arches National Park for Alt. B route designations near the Park has been noted.
Arches National Park	8	7	We would suggest that the visual impact analysis consider night lighting and effects on night sky.	Night lighting is a component of Visual Resource Management and would be considered on a case by case basis as projects are analyzed for impacts to visual resources. Impact to night skies would be considered a cumulative impact within these site-specific analyses.
Arches National Park	8	8	The RMP states (page 2-50) that "Restoration and rehabilitation would use native seed-mixes wherever possible. Non-native species may be used as necessary for stabilization or to prevent invasion of noxious or invasive weed species." We would request that only native species be used near Arches and Canyonlands.	The desire for only native seed mixes to be used near the National Parks has been noted.
State of Utah - Public Lands Policy Coordination	120	1	The BLM should consider the potentially large economic effects the oil and gas industry might have on Grand and San Juan Counties as shown in the Economic and Business Research Study (Phase I) for oil and gas in the Uintah Basin.	The BLM acknowledges the oil and gas study referenced for the Uintah Basin. However, the applicability to Moab is limited. The Moab Field Office prepared a Reasonably Foreseeable Development (RFD) scenario for oil and gas development over the next 15 years. The development predicted in the RFD was utilized to generate the economic impacts in the Draft RMP/EIS as detailed on pg. 4-259 through 4-264.
State of Utah - Public Lands Policy Coordination	120	2	Utah State law indicates that river segments proposed for Wild and Scenic designation should contain water at all times.	According to the “Wild and Scenic River Review in the State of Utah Process and Criteria for Interagency Use” (July 1996), “there are no specific requirements concerning minimum flow for an eligible segment”. The BLM is aware that there are specific State laws relevant

				to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA requires that BLM's land use plans be consistent with State and local plans “to the extent practical” where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved. The BLM will identify these conflicts in the FEIS/PRMP so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options.
State of Utah - Public Lands Policy Coordination	120	3	The state is concerned about suitability findings for those streams where there are significant water diversions upstream.	According the “Wild and Scenic River Review in the State of Utah Process and Criteria for Interagency Use” (July 1996), Congress has allowed for the existence of some human modification of a riverway, the presence of impoundments or major dams above or below a segment under review (including those that may regulate the flow regime through the segment). The existence of minor dams, diversion structures, and rip-rap within the segment shall not by themselves render a reach ineligible.
State of Utah - Public Lands Policy Coordination	120	4	The state contends that while federal reserve water rights are not asserted prior to designation, those stream reaches found suitable are managed as if they were designated.	Barring congressional action, there is no effect on water rights or instream flows related to suitability findings made in a land use plan decision. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no effect on existing water rights. Section 13(b) of the Wild and Scenic River Act states that jurisdiction over waters is determined by established principles of law. In Utah, the State has jurisdiction over water. Although the Wild and Scenic Rivers Act implies a federal reserved water right for designated rivers, it does not require or specify any amount, and as noted above, confirms that Utah has jurisdiction over water rights. The BLM would be required to adjudicate the water right, in the same manner as any other entity, by application through state processes. Thus, for congressionally designated rivers, BLM may

				assert a federal reserved water right for appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. The Draft RMP/EIS states (pg. 2-39) that the BLM would not seek water rights as part of a suitability determination made in the Record of Decision for the RMP.
State of Utah - Public Lands Policy Coordination	120	5	State policy discourages permanent closure of grazing allotments for improving watershed health, wildlife habitat, and the economic benefits of livestock production. The state strongly suggests that BLM support flexibility within the management provisions for livestock grazing time (duration) and timing (season of use) in the final plan.	Allotments proposed for closure on page 2-12 are not permanent and the decision to close these allotments or areas may be revisited in the development of subsequent RMPs or the revision of this one. However, certain allotments may not be available for grazing over the life of the plan. The allotments considered, as not available are spread by alternative. Subsequent revisions of the land use plan may consider opening these areas to livestock grazing. The vast majority (over 95%) of the Moab Planning Area is available for livestock grazing. For those limited number of allotments shown on page 2-12 of the DRMP/EIS, the BLM is proposing that other uses of the BLM land are the highest and best use of these areas. Both FLPMA and BLM's Land Use Planning Handbook authorizes BLM to close specific areas to livestock grazing to place an emphasis on these areas for other purposes or values, such as wildlife use, watershed protection, and recreation. As indicated by the variable uses of the BLM lands, as shown in the proposed action, it is BLM's intention to emphasize "multiple use" of the public lands within the planning area. As stated in the DRMP/EIS (pg. 2-12), for those areas open to livestock grazing, grazing would be managed on an allotment basis according to the Guidelines for Livestock Grazing Management to meet the Standards for

				Rangeland Health (see Appendix Q), including duration and adjustment in season of use. This will provide the manager flexibility to adjust the permitted numbers of livestock, and the season and duration of use on specific allotments after the careful evaluation of monitoring and inventory data in full compliance with appropriate rules and regulations and BLM policy.
State of Utah - Public Lands Policy Coordination	120	6	The State supports the conversion of livestock AUMs to wildlife AUMs for the Diamond, Cottonwood, Bogart, and Pear Park allotments.	The BLM has recognized (Alts A, B, & C) the wildlife value of the Cottonwood, Diamond, and Bogart allotments as acknowledged in the 1994 Memorandum of Agreement among the BLM, UDWR, and the Nature Conservancy. The Pear Park allotment, which is unavailable in Alts A & B, has been made part of the PRMP/FEIS.
State of Utah - Public Lands Policy Coordination	120	7	The State believes the BLM should only employ the term "critical habitat" when referring to the legal habitat desigantions for endangered and threatened speicies under the Endangered Species Act. The State requests that the BLM use the "crucial habitat" designations mapped by the UDWR.	The term critical has been reserved to Threatened and Endangered (T &E) species. Corrections in the text have been made in the PRMP/FEIS. For non-T&E species the BLM relied on the UDWR crucial habitat designations.
State of Utah - Public Lands Policy Coordination	120	8	The State asks BLM to provide a detailed explanation of the rationale and authority for management of lands solely because of wilderness characteristics, and why such management does not circumvent the provisions of the statutorily required wilderness review process.	The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202©(2) (43 U.S.C. §1712©(2)).) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, section 103© (43 U.S.C. §1702©).) The FLPMA intended for the Secretary of the Interior to use land use planning as a

				mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics."
State of Utah - Public Lands Policy Coordination	120	9	The BLM should give strong consideration to recommendations submitted by local government and not manage lands to protect wilderness character where such management would, in the opinion of local governments, be contrary to the interests of local residents.	Sections 103, 201, and 202 of FLPMA direct the BLM to take into account the national interest, as well as the local interest. In accordance with FLPMA and BLM rules, regulations, and policies, the BLM must provide for the balanced management of all resources and resource uses on public lands. The BLM gave strong consideration to the concerns of local governments throughout the planning process. In particular, Grand and San Juan Counties are cooperating agencies and have been active cooperators, including during the development of alternatives where Non-WSA areas with wilderness characteristics were considered. See also response to comment 121-70.
State of Utah - Public Lands Policy Coordination	120	10	The State strongly disagrees with the BLM's analytical assumption at page 4-3 of the Draft RMP/EIS that non-BLM lands would suffer minimally direct impacts from RMP decisions. SITLA lands may have reduced revenue potential or management obectives that differ from the BLM. The BLM planning decisions on rights-of-way, withdrawals from mineral leasing, special	Non-BLM lands could be indirectly impacted by RMP decisions both positively and negatively. The analysis in Chapter 4 of the PRMP/FEIS has been modified accordingly. For specifics regarding the impacts on mineral revenue see comment 120-101. The BLM does provide for reasonable access to all SITLA

			designations, and other determinations impact state trust lands.	lands under all alternatives (pg. 4-3). A sentence will be added to Chapter 2, Lands and Realty : Non-BLM lands could be indirectly impacted by RMP decisions both positively and negatively. The analysis in Chapter 4 of the PRMP/FEIS has been modified accordingly. For specifics regarding the impacts on mineral revenue see comment 120-101. The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). Information will be added to Chapter 2, Lands and Realty, Management Common to all action alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79). In addition, the Moab DRMP/DEIS travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision. Also, please see the revised analysis under Socio-Economics in Chapter 4 of the PRMP/FEIS.
State of Utah - Public Lands Policy Coordination	120	11	The need for BLM to give priority to state-federal land exhanges has been recognized. The disposal land list is inadequate and lands should be added to this list including 1) all lands proposed for BLM disposal in the pending Utah Recreation Land Exchange Act; 2) the block of BLM lands west of the Canyonlands airport that are currently subject to Potash preference right leases, and 3) all lands in Lisbon Valley.	The Federal Land Policy and Management Act (FLPMA) Section 203 requires the BLM to use the land use planning process to identify lands for disposal through sales. Indentifying lands for Section 203 sale requires the BLM to meet certain criteria set out specifically in the Statute. FLPMA allows the BLM to identify lands that would be available for exchange (both disposal and acquisition) more generally. The DRMP/EIS has identified lands generally available for exchange, including identifying State lands that are currently available for acquisition. The DRMP/EIS does not contain a schedule or prioritize these lands, but the BLM understands that State in-lieu and other exchanges are a high priority for the State and

				for the BLM.
State of Utah - Public Lands Policy Coordination	120	12	The BLM should commit to utilizing the State's expedited energy permitting process.	Federal laws, rules, regulations, and policies govern the procedures for processing all Federal projects.
State of Utah - Public Lands Policy Coordination	120	13	The State encourages the BLM to impose air emission standards as lease conditions and conditions of approval for Applications for Permit to Drill.	The BLM does not have the responsibility to set air emission standards. That responsibility lies with EPA and the State of Utah. The BLM can only approve actions that meet the National Ambient Air Quality Standards as set by EPA or the State. Site specific mitigation or conditions of approval may be applied at the APD or implementation phase but not during land use planning and leasing.
State of Utah - Public Lands Policy Coordination	120	14	Future air quality analysis should include modeling with the following factors: 1) oil and gas proponents should assume that leasing and exploration will result in full field development, 2) air quality analyses should be cumulative and include not only planned development but existing omission sources, 3) air quality analyses should be based on anticipated worst-case meteorological conditions for each dispersion scenario, 4) air quality analyses should address compliance/attainment with all applicable air quality-related requirements and standards, and 5) air quality analysis should specifically address impacts to sensitive visual resources and other air quality-related values.	The BLM may consider the commentor's recommendation for future air quality modeling and analyses.
State of Utah - Public Lands Policy Coordination	120	15	Under the preferred alternative (Alt C), certain existing routes that provide the only physical access to trust lands would be terminated. The Draft RMP does not address the impact of these closures on the economic value of the affected trust lands in either this section or its section on socioeconomic impacts.	The travel plan provides restrictions to the public for recreational purposes, but does not restrict uses permitted or authorized by the BLM. State inholdings may or may not currently have access, depending upon whether or not exisitng vehicle routes lead to them. Under different alternative scenarios, existing routes may be proposed to closure. BLM policy, as required by the Cotter decision (State of Utah v. Andrus, 10/1/79), is that "the state must be allowed access to the state school trust lands so that those lands can be developed in a manner that will provide funds for the common school…" This decision confined the issue of access to situations

				directly invlovling economic revenues generated for the school trust. The recreation restrictions do not prohibit the State from reasonable access to its lands for economic purposes through separate permit authorization as specified by the Cotter decision. Routes to State sections may not have been identified for recreation purposes due to resource conflicts or actual route conditions.
State of Utah - Public Lands Policy Coordination	120	16	The State asks the BLM to explain its intention to designate D roads, and explain why different D roads may be designated across alternatives. Please clarify the authority under which BLM would designate county roads, and what happens to a D road if BLM chooses not to designate it… pursuant to RS 2477.	A "D" route does not equate to a County road assertion. The routes identified as "D" routes in the land use plan are routes located on public lands and managed by the BLM until properly adjudicated. The DRMP/EIS proposes four different alternatives for which to manage these routes As specified in the Draft RMP/EIS (pg. 1-12), addressing RS 2477 assertions is beyond the scope of this planning effort. However, nothing extinguishes any right-of-way or alters in any way the legal rights the State and counties have to assert and protect RS 2477 rights. The Proposed RMP/Final EIS will not address RS 2477 assertions. Such assertions will be settled administratively on a case-by-case basis or a s confirmed through other legal means.
State of Utah - Public Lands Policy Coordination	120	17	The use of vehicles along the course of the Green River impacts natural resources and other recreational users of the corridor far beyond the traveled path due to noise.	The BLM assessed the impacts on natural resources and recreation conflict between motorized access and river based recreation. The BLM determined that the purpose and need associated with the route outweighed the specified conflict.
State of Utah - Public Lands Policy Coordination	120	18	No mention is made of water rights. The State Engineer recommends that the BLM consider the impact its actions may have on water rights in general and non-BLM water rights in particular.	On pg. 1-13 of the Moab DRMP/EIS under Planning Criteria, it is noted 1) the planning process recognizes the existence of valid existing rights, and 2) the BLM would adhere to all applicable laws (including State water laws). The text was clarified to ensure that valid water rights are recognized as valid existing rights.On page 1-13 of the

				DRMP/EIS under Planning Criteria, the BLM states 1) the planning process would recognize the existence of valid existing rights, and 2) the BLM would adhere to all applicable laws (including state and local laws). The text has been edited to ensure that water rights are recognized as valid existing rights. See response to comment 120-4.
State of Utah - Public Lands Policy Coordination	120	19	The proper description of deer and elk crucial winter habitats and Rocky Mountain bighorn habitat should occur regardless of the alternative.	As required by NEPA, the BLM considered a range of alternatives. For non-special status species the alternatives varied by the size of the habitat and the timing restrictions. The management of habitat is consistent with the goals and objectives of each alternative. In the Draft RMP/EIS, Alt B has a timing limitation for what is referred to as "winter habitat." This habitat actually includes both crucial and high value winter habitats (635,774 acres). These habitats, although not separated in the draft, have been properly described in the PRMP/FEIS. Alts C and D provide timing limitations for crucial winter habitat only (349,955 acres), not for both crucial and high value habitats. The text has been changed to correct the error of confusing crucial and high value winter habitats.
State of Utah - Public Lands Policy Coordination	120	20	None of the alternatives address the fact that desert bighorn sheep wander between Crystal Geyser, Duma Point, and the Blue Hills. This migration corridor should be recognized in the final RMP.	Duma Point and Blue Hills habitat and migration corridors are recognized in the Draft RMP/EIS. Crystal Geyser is a small satellite population of recognized habitat located more than 10 miles across flat terrain from Duma Point. Defining a migration corridor across this flat terrain is unknown at this time. No known habitat exists between Duma Point and Crystal Geyser. Current studies are underway that may identify a migration corridor.
State of Utah - Public Lands Policy	120	21	The estimate of disturbed acreage to white-tailed prairie dogs as identified on page 4-315 is under estimated. Increased volume and speed of traffic, frequent road	Table 4.91 (pg. 4-315) has been changed to clarify that the acreage of disturbance from oil and gas development includes ancillary facilities such as roads, pipelines, and

Coordination			upgrades, and construction of utility poles and storage tanks, noise from wells and compressors, and increased recreational use will negatively impact prairie dogs.	powerlines. The BLM acknowledges in the impact analysis that there may be additional loss of individuals due to increased volume and speed of traffic.
State of Utah - Public Lands Policy Coordination	120	22	It is unclear how State comments will be sought for new rights-of-way for pipelines or service-access roads.	Where applicable, coordination with other Federal, State, and local entities will be sought as mandated under FLPMA, NEPA, and individual program requirements. All current NEPA documents prepared by the Utah BLM are posted on the Environmental Notification Bulletin Board via the BLM internet site. Access to this database is available to the State and the public.
State of Utah - Public Lands Policy Coordination	120	23	Surveys for wildlife are not considered to be a vaild form of compensatory mitigation.	The language on pg. 4-315 has been clarified to state: "The results of these surveys will be used for avoidance and other mitigating measures."
State of Utah - Public Lands Policy Coordination	120	24	The BLM should recognize that prairie dogs create important habitat for many other wildlife species. There is room to enhance the discussion in the Proposed RMP/Final EIS.	The Proposed RMP/Final EIS (pg. 4-314) includes discussion about the benefits provided by prairie dog habitat to other important habitat.
State of Utah - Public Lands Policy Coordination	120	25	The BLM should only allow the use of utility poles in areas where underground conduits are not practical. Raptor excluders should be placed on utility poles where needed.	Upon receipt for proposed development, the BLM will analyze the impacts to prairie dogs and other wildlife as part of the NEPA process and would apply the appropriate mitigation measures as necessary. This may include underground conduits and raptor excluders.
State of Utah - Public Lands Policy Coordination	120	26	The BLM should work with the U.S. Department of Agriculture Wildlife Services to reduce nesting by ravens on storage tanks and other oil and gas infrastructure (i.e. design structures to be less suitable for nests).	Refer to comment 120-25.
State of Utah - Public Lands Policy Coordination	120	27	Enforce a 45 mile-per hour speed limit on secondary roads in oil and gas development areas from July through September to prevent deaths of young hawks and owls due to vehicle impact.	The speed limit on secondary roads is 25 mph unless otherwise posted.
State of Utah - Public Lands Policy	120	28	When existing roads in raptor areas where they are likely to experience greatly increased trafffic due to oil and gas well development, roads should be relocated	Refer to comment 120-25.

Coordination			as far as practical from the raptor nests regardless of whether or not the wells themselves are within a nest buffer.	
State of Utah - Public Lands Policy Coordination	120	29	On pg. 3-143, the RMP states "the planning area is not considered a suitable reintroduction area for black-footed ferrets due to dramatic declines in prairie dog populations". DWR considers the Cisco Desert the number 2 priority for black-footed ferret reintroduction in Utah and request that this language be removed from the RMP/EIS	The language in the text (pg. 3-143) of the Proposed RMP/Final EIS that states "the planning area is not considered a suitable reintorduction area for black footed ferrets" has been deleted .
State of Utah - Public Lands Policy Coordination	120	30	The BLM should consider including the parcel surrounding the Gunnison's prairie dog habitat northwest of Bridger Jack Mesa as part of the Behind the Rocks ACEC.	When the BLM developed alternatives, the commentor did not identify this area as Gunnison's prairie dog habitat. Furthermore, most of the area referred to is State land.
State of Utah - Public Lands Policy Coordination	120	31	Parcel R-11 which is identified for disposal under all alternatives contains Gunnison's prairie dog habitat. The State urges caution regarding the disposal of this land because the Gunnison's prairie dog may become petitioned for listing under ESA.	Parcel R-11 has been dropped from the disposal list (Appendix D, pg. D-3).
State of Utah - Public Lands Policy Coordination	120	32	Map 2-25 does not delineate pronghorn fawning habitat south of I-70 in the Cisco Desert.	Although pronghorn habitat is identified south of I-70, the BLM and UDWR agreed that the majority of fawning occurs north of I-70 due high population densities. UDWR habitat data from 2003 does not identify any pronghorn habitat south of I-70. Pronghorn habitat south of I-70 was added by BLM due to known and potential occupancy.
State of Utah - Public Lands Policy Coordination	120	33	Fragmentation of crucial big game winter habitat due to oil and gas development should be mitigated through restoration at 4 acres for every 1 acre disturbed.	According to Washington Office Instruction Memorandum 2005-069, the BLM may identify off-site mitigation opportunities to address impacts of the project proposal, but is not to carry them forward for detailed analysis unless volunteered by the applicant.
State of Utah - Public Lands Policy Coordination	120	34	Reference the Utah Comprehensive Wildlife Strategy as the Utah Wildlife Action Plan.	This reference has been changed on pg. 2-44.
State of Utah -	120	35	The State recommends listing the following nine	These species are listed on pg. 3-146 to 3-148.

Public Lands Policy Coordination			species of concern: Allen's big-eared bat, American three-toed woodpecker, big free-tailed bat, cornsnake, ferruginous hawk, spotted bat, and Townsend's big-eared bat.	
State of Utah - Public Lands Policy Coordination	120	36	The State recommends a 2 mile buffer within active sage grouse leks. The habitat reclamation ratio should be 4:1. There are currently no alternatives or reparations known to suitably replace a sage grouse lek.	There are currently no active Gunnison or greater sage- There are currently no active Gunnison or greater sage-grouse leks in the Moab Field Office. In 2005, the BLM and UDWR signed the Gunnison Sage-grouse Rangewide Conversation Plan. One of the conservation measures identified in the plan to minimize impacts from mineral development was "apply a lease stipulation of No Surface Occupancy within 0.5 miles of occupied lek sites year round". Since the Moab Field Office currently has no active leks a Controlled Surface Use/Timing Limitation stipulation of 2.0 miles was applied so that any leks discovered in the future could be protected. This stipulation also precludes permanent surface occupancy within 2.0 mile of an active lek and no surface disturbing activities allowed within 0.5 miles year round. To be consistent with the Utah State Sage-grouse strategy, the controlled surface use/timing limitation lek buffer for greater sage-grouse has been changed from 0.5 mile to 2.0 mile in the Preferred Alternative (Alt C). The BLM agrees that sage-grouse leks are irreplaceable, and Alts B and C offer the greatest degree of protection for them (2 mile lek buffer). Alt B, if selected in the final decision document, would provide the greatest level of protection for any leks identified, while Alt D would provide the least amount of protection. See the response to comment 120-33.
State of Utah - Public Lands	120	37	It is stated on pg. 4-453 that interim and final reclamation will use native seeds. The State believes	On pg. 2-50 it is stated that "Restoration and rehabilitation would use native seed mixes wherever possible. Non-

Policy Coordination			there are situations and circumstances where non-native plants may be the only tool to mange non-native weeds.	native species may be used as necessary for stabilization or to prevent invasion of noxious or invasive weed species." The reference on pg. 4-453 has been changed to reflect this.
State of Utah - Public Lands Policy Coordination	120	38	Seasonal restrictions and spatial buffers should be required of energy development. Use the U.S. Fish and Wildlife Services Raptor Protection Guidelines.	On pg. 2-53 it is specified that raptors are to be managed in accordance with the Best Management Practices (BMPs) included in Appendix O. These BM's implement the Utah Field Office Guidelines For Raptor Protection From Human and Land Use Disturbances (F&WS, 2002) and provide for modifications of spatial or temporal raptor nest buffers, if an established set of criteria can be met. The document specifies that the BMPs, or specific elements of the BMPs, which pertain to the proposal, should be attached as Conditions of Approval to all BLM use authorizations that have the potential to adversely affect nesting raptors, or would cause occupied nest sites to become unsuitable for nesting in subsequent years. Therefore, the raptor BMPs can be applied to any surface disturbing action, including energy development activities, where raptor nesting may be affected. As specified in the U.S. Fish and Wildlife Service "Guidelines" document, modifications of spatial and seasonal buffers for BLM-authorized actions would be permitted, so long as protection of nesting raptors is ensured. State and/or Federally-listed, proposed, and candidate raptor species, as well as BLM State-sensitive raptor species, should be afforded the highest level of protection through this BMP process; however, all raptor species would continue to receive protection under the Migratory Bird Treaty Act. Modification of the buffers for threatened or endangered species would be considered pending results of Section 7 Consultation with U. S. Fish and Wildlife Service.
State of Utah - Public Lands	120	39	The economic impacts summary table 2-2 (pg. 2-78) for minerals is incomplete. It only mentions lease rental	The economic benefits of severance taxes to the State of Utah as a whole are referenced on pg. 4-262. Information

Policy Coordination			royalty payments for oil and gas. Severance tax and property tax should be addressed as economic benefits. The same table discusses the economic impacts of recreation through sales tax and employment (2,000 jobs), but fails to indicate whether or not those are low or high paying, seasonal or permanent jobs.	on the economic benefits of severance tax have been added to table 2-2. Property taxes levied on natural resources can be broken by commodity and county and this has been added to table 2-2 (pg. 279). The economic benefits of property taxes (ad valorem) are also discussed on pg. 4-262. Information on wage distribution for recreation jobs has been added to Chapter 3 (pg. 3-104).
State of Utah - Public Lands Policy Coordination	120	40	The summary of impacts section should be expanded to discuss constraints upon mineral development when all requirements proposed under each alternative are considered concurrently. This should include the acreage available under each alternative, but the viability of development in light of restrictive but not prohibitive requirements such as Class II Visaul Quality.	The summary of impacts section is a summary and does not provide a detailed discussion. The acreage provided under each alternative is provided in the summary. A discussion of the impacts to minerals from visual resource restrictions is provided on pg. 4-107.
State of Utah - Public Lands Policy Coordination	120	41	The discussion of locatable minerals notes that the anticipated effect of uranium development would be the same under all alternatives because the acres open to extraction would be the same across all alternatives (see pg. 4-259).	On pg. 4-106 to 4-108, it is acknowledged that special stipulations (timing and visual restrictions) impose additional constraints and costs to locatable mineral operations. The actual costs depend on many factors and can not be quantified on a landscape level document.
State of Utah - Public Lands Policy Coordination	120	42	None of the alternatives adequately analyze the loss of revenue from formally or effectively from eliminating mineral development in many of the lands subject to Special Designations and restrictive viewshed.	On pg. 4-264 the royalty revenues generated under each alternative are provided for oil and gas. The Moab Field Office has only one producing locatable mineral mine (Lisbon copper mine) and revenues (severance and property taxes) from this do not vary across alternatives.
State of Utah - Public Lands Policy Coordination	120	43	The air quality analysis assumed all new compressors would operate at a NOx emission rate of 0.7 g/hp-hr (pg. 4-17). How will the BLM ensure this projection for newly permitted compressors.	This figure (0.7 g/hp-hr) was used as an analysis assumption and is based on the best available control technology. Air quality impacts will be analyzed for specific proposed oil and gas development on a case by case basis during the NEPA process. Air quality emission restrictions can be imposed at that time.
State of Utah - Public Lands Policy Coordination	120	44	The air quality analysis assumed well spacing of 40 acres and 40 kilometers. Please confirm this analysis spacing.	The analysis assumption was based on 40 acre well spacing as stated on pg. 4-20. This spacing was utilized because it represents a conservative estimate for the oil and gas operations conducted within the Moab Field Office. The spacing varies by area.
State of Utah - Public Lands	120	45	Assumptions regarding the number of compressors and dehydrators listed on page 4-20 are inconsistent with	The BLM recognizes this discrepancy and has made appropriate changes to both the table and the text (pg. 4-

Policy Coordination			those shown in Table 4.7. If the numbers in Table 4.7 are correct and the analysis was based on the numbers discussed in the text, the analysis could significantly understate air quality impacts.	20) in the Proposed RMP/Final EIS.
State of Utah - Public Lands Policy Coordination	120	46	The State recommends the BLM undertake a final check to ensure that other potential areas of high cultural resource densities or values are examined for potential conflicts. The MFO should use techniques such as GIS, existing site databases.	In accordance with the BLM Land Use Planning Handbook (1601.1), a Class I cultural survey was conducted. For site specific actions the BLM conducts a Class III cultural survey as appropriate. On pg. 4-30 a model of cultural resource site density is described that was used to predict potential impacts to cultural resources. This model identified high, medium, and low site densities and this information was used to quantify the impacts. The model was tested by intersecting 4,259 known cultural sites with the probability coverage in GIS.
State of Utah - Public Lands Policy Coordination	120	47	The State suggests that the BLM develop a specific ongoing program to identify and target identification efforts under Section 110 of the National Historic Preservation Act.	These type of actions are administrative and do not require land use planning decisions to accomplish. However, on pg. 2-8, cultural resource inventory areas under Section 110 are prioritized.
State of Utah - Public Lands Policy Coordination	120	48	The State suggests enhancing and strengthening the density analyses utilized in the Draft RMP/EIS. These techniques could be significantly enhanced and strengthened in implementation of the Final Plan for high cultural resource value areas which include Sego Rock Art, Wall Street/Colorado River Rock Art, Behind the Rocks, Tenmile Wash, Mill Creek Canyon/South and North Forks of Mill Creek, the Wall Street portion of the Highway 279/Shafer Basin/Long Canyon proposed ACEC, Westwater Canyon, Kane Springs Canyon, Sevenmile Canyon, Bartlett/Hidden Canyon, Hell Roaring Uplands, and the Dolores River Canyon.	The BLM will continue to enhance the inventory and density techniques for high cultural value areas identified in the final plan. Each of the cultural high value areas mentioned by the commentor has been included in the Proposed Plan for inventory in the Final EIS including Sevenmile Canyon (refer to pg. 2-8).
State of Utah - Public Lands Policy Coordination	120	49	The State requests that a cultural resource management plan be developed for Special Recreation Management Areas.	In Management Common to All Action Alternatives for Cultural Resources (pg. 2-7), several specific areas are mentioned for cultural resource management priority; Ten Mile Wash, Mill Creek Canyon, Behind the Rocks, and Wall Street. These 4 areas coincide with high visitation

				areas managed as SRMAs. The text has been changed to state that Cultural Resource Management Plans will be a component of the implementation plans for the SRMAs that include the 4 cultural areas.
State of Utah - Public Lands Policy Coordination	120	50	The State suggests that BLM specify in the RMP the subsequent development of specific cultural resource management plans, especially in areas with potential resource conflicts between cultural and recreation/travel. These plans could provide for potential heritage tourism development where warranted.	See response to comment 120-49. In addition, potential heritage tourism development would be a component of the aforementioned Cultural Resource Management Plans (pg. 2-7).
State of Utah - Public Lands Policy Coordination	120	51	The BLM should clarify the criteria utilized to determine which areas with wilderness characteristics (WC) were included in the preferred alternative.	Four alternatives for managing public lands, including lands with wilderness characteristics, are present in the Draft RMP/EIS. The range of alternatives considered issues and concerns raised during the scoping period, planning criteria, and the guidance applicable to resource uses. The alternatives constitute a range of management actions that set forth different priorities and measures to emphasize certain uses or resource values over other uses or resource values under the multiple use and sustained yield mandate of FLPMA to achieve certain goals and objectives. The preferred alternative, Alternative C was crafted by an interdisciplinary team and cooperating agencies to provide a balance between commodity production and resource uses while providing protection to a wide spectrum of resource values. These resource values include those associated with wilderness characteristics, ACECs, Wild and Scenic Rivers, sensitive soils, watersheds, visual resources, wildlife values, and floodplain/riparian areas.
State of Utah - Public Lands Policy Coordination	120	52	The BLM needs to consider the new information on roads (2007) to reevaluate the findings of the 1999/2003 wildereness inventory.	The 2003 Revision Document for the Moab Field Office made adjustments to Wilderness Inventory Areas based on county road data, none of which differs from the current county inventory. BLM stands by its 1999/2003 data.
State of Utah - Public Lands	120	53	The BLM inconsistently applied road data between the 1999 inventory and the 2007 WC review.	The BLM did not inconsistently apply the road data, but used the policies and procedures applicable at the time of

Policy Coordination				review. The Wilderness Study Area Interim Management Policy (IMP, H-8550-1; BLM 1995). The “IMP” or “WSA Handbook”) was used during the inventory process conducted prior to 2004. The WSA IMP emphasized the difference between “roads” and “ways”. Under that policy, the presence of a “road” was considered to negatively affect the wilderness characteristics of an inventory unit, therefore, the road and affected area needed to be excluded. The presence of a “way” however, was not considered, in and of itself, to have a sufficient negative affect on naturalness of an area to disqualify all or part of an inventory unit. In 2004, the BLM settled the ongoing litigation with the State of Utah (Utah v. Norton Settlement Agreement). It was acknowledged that the BLM may continue to inventory public lands for resources or other values, including wilderness characteristics, as a part of managing the public lands and land use planning. Inventories conducted post-2004 applied current policy, which is based on Washington Office Instruction Memorandum 2003-275, Change 1, which emphasizes naturalness and does not distinguish “roads” from “ways”. The BLM has evaluated wilderness characteristics since 2004 on the basis of affects to the naturalness of an area, which could either be from roads or ways.
State of Utah - Public Lands Policy Coordination	120	54	On page 4-157, the DEIS states that under Alt B, all 266,485 acres of non-WSA lands with wilderness characteristics would be managed as VRM class II. Table 4.55 indicates some WC lands that would be managed as VRM class I, please clarify.	The VRM I acreage within WC areas in Alt B results from other decisions made under Alt B. For example, Beaver Creek, Fisher Towers, Mary Jane Canyon, and Mill Creek Canyon contain rivers found suitable as "wild" for Wild and Scenic River status. Wild Rivers are managed as VRM I. Portions of the other areas are managed as scenic ACECs under Alt B resulting in VRM I management in that alternative. WC management alone does not result in VRM I management under any alternative.
State of Utah -	120	55	On pages 4-158 and 159, the DEIS states that under	New water developments would be precluded under Alt B

Public Lands Policy Coordination			Alternative B, new water development facilities for wildlife would likely be precluded within non-WSA lands with wilderness characteristics. Please discuss the extent to which Alt C would preclude development of water facilities.	since non-WSA lands with wilderness characteristics (WC) are closed to surface disturbing activities. However, in Alt C WC lands are managed as No Surface Occupancy which provides an exception if the use is consistent and compatible with protection or enhancement of the resource values (see Appendix C). Under Alt C, a new wildlife water development could potentially be considered an enhancement of the natural values based on future NEPA analysis for such a proposal.
State of Utah - Public Lands Policy Coordination	120	56	Many of the WC areas were divided into sub -units based on "substantially noticeable routes". Is this division appropriate?	In Appendix P (pg. P-2), the BLM discusses the size criteria for areas with WC. The size criterion of 5,000 acres was applied only to stand alone units. Units contiguous with other Federal lands with WC were evaluated for naturalness alone.
State of Utah - Public Lands Policy Coordination	120	57	Portions of Arches Adjacent WC subunits 4-6 are not identified on the map. The text discussing unit five identifies wilderness characteristics for 625 acres, but the map does not show contiguity with the Park.	Placement of the labels on the WC supplemental maps have been refined for clarity.
State of Utah - Public Lands Policy Coordination	120	58	The text for the Diamond Canyon WC indicates that unit six does not meet wilderness characteristic requirements but the map appears to indicate otherwise.	The WC supplemental map for the Diamond Canyon WC shows a small portion of unit 6 as possessing WC. This is a mapping error which has been corrected; the text is correct.
State of Utah - Public Lands Policy Coordination	120	59	The map for the Goldbar WC show two exclusions from the analysis area (blue circles) that are not discussed in the text. What are these areas? Area six is discussed in the text but not identified on the map.	These exclusions are "doughnuts" in the data provided by the proponent and are meant to be exclusions due to impacts on naturalness. Unit six is shown on the map but the label has been improved.
State of Utah - Public Lands Policy Coordination	120	60	Portions of the Labyrinth Canyon and Lost Spring WC area determined to possess wilderness characteristics in the 1999-2003 review appear to have high route density. Please explain why these routes do not compromise either naturalness or the outstanding opportunities for solitude or a primitive and unconfined type of recreation.	Refer to response to comments for 120-52 & 53 for an explanation of roads vs. ways and the withdrawal of the Wilderness Handbook. The 2003 Revision Document removed from the original Wilderness Inventory Area those portions with "way" density so high as to preclude such opportunities. The routes in the remaining Wilderness Inventory Area are sufficiently unnoticeable and unused that their inclusion does not substantially detract from the wilderness characteristics.

State of Utah - Public Lands Policy Coordination	120	61	Area four of the Labyrinth Canyon WC is mapped as having WC but the text is contradictory.	The label for Area 4 has been repositioned to be more clear.
State of Utah - Public Lands Policy Coordination	120	62	The Mary Jane Canyon WC area appears to have high route density. Please explain why these routes do not compromise either naturalness of the outstanding opportunities for solitued or a primitive and unconfined type of recreation.	See response to comments G-120-52,53, & 60 on route density. Most of the routes depicted in the Mary Jane Canyon area are substantially unnoticeable oil and gas seismic lines which are not being designated for travel under any of the Action Alternatives (B, C, & D). Alt C removes from WC management virtually all of the lands in the Mary Jane Canyon WC area in which these routes are located.
State of Utah - Public Lands Policy Coordination	120	63	The text and map for the Mill Creek WC area conclude that the analysis area lacks wilderness characteristics, but the wilderness characteristics review form shows that "some or all of the area has wilderness characteristics as shown on the attached map".	The 1999/2003 review found 3,388 acres of the Mill Creek WC area to possess wildlerness characteristics. Subsequent review in 2007 found no additional areas to possess WC. The supplemental WC files on the BLM website state this in the text and on the map.
State of Utah - Public Lands Policy Coordination	120	64	The State is opposed to the establishment of ACECs overlapping Wilderness Study Areas (WSAs). The State also does not favor creation of ACECs that exceed the scope of the resources they are designed to protect.	The BLM has separate policies and guidelines, as well as criteria, for establishing ACECs and WSAs. These differing criteria make it possible that the same lands will qualify as both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies. The values protected by WSA management prescriptions do not necessarily protect those values found relevant and important in ACEC evaluation, and vice versa. The relevant and important values of ACECs within or adjacent to WSAs were noted in the ACEC Evaluation (Appendix I). The ACECs are evaluated and ranked based on the presence or absence of the stated relevant and important values. None of these values includes wilderness characteristics. Additionally, the management prescriptions for the ACECs is limited in scope to protect the relevant and important values, and the BLM maintains that the size of the ACEC areas is appropriate for protection of the relevant and important values identified.

State of Utah - Public Lands Policy Coordination	120	65	State Parks currently has an R&PP lease for land along the east side of Dead Horse Point State Park that is within both the Colorado River SRMA and the Highway 279 Corridor/Shafer Basin/Long Canyon ACEC. The State would like to request an exception for the land currently under R&PP lease that would eventually allow this land to be pantented to the Division.	The R&PP lease is a valid existing right and therefore the State of Utah has the right to go to patent upon completion of its plan of development.
State of Utah - Public Lands Policy Coordination	120	66	The State seeks information on developing and approving Recreation Area Management Plans (RAMP) and River Management Plans.	After completion of the RMP, those SRMAs that do not currently have RAMPs will be subject to the development of a site specific RAMP, subject to NEPA. The process is identifcal for River Management Plans.
State of Utah - Public Lands Policy Coordination	120	67	The Draft RMP/EIS states that where a specific focus area is not identified with a Special Recreation Management Area, the focus of that area is motorized, backcountry touring on designated roads. This statement appears to indicate that those portions of SRMAs that are not subject to a mor specific focus area will be managed to emphasize motorize recreation. This appears inconsistent with designating SRMAs to emphasize non-motorized recreation and mountain bike backcountry touring. Please also explain haw management of focus areas specifically designated for "motorized backcountry touring" would differ from the default management of SRMA for motorized backcountry touring.	The BLM acknowledges that there are entire SRMAs that are focused on a particular type of recreation. The decision on pg. 2-18 has been changed to reflect this; "where a specific type of SRMA or focus area is not identified, the focus of that area is motorized backcountry touring on designated routes". Focus areas particularly for backcountry motorized touring would be managed more intensively than the default management. For example, focus areas for motorized backcountry touring could be considered for new route creation.
State of Utah - Public Lands Policy Coordination	120	68	The Draft RMP/EIS makes repeated reference to "destination SRMAs" (pg. 2-19). Please explain what a "destination SRMA" is and how such areas would be managed.	Destination SRMAs are those where the majority of visitation is from without the local area. A destination SRMA definition has been added to pg. 2-18.
State of Utah - Public Lands Policy Coordination	120	69	The Cottonwood-Diamond Watershed Potential ACEC notes that the proposed designation would remain in force, "until the watershed is restored to a healthy and functioning condition". Please clarify what management conditions would apply once the desired future condition is attained and the mechanism used to change prescriptions.	The Draft RMP/EIS states on pg. 4-320 that the ACEC would be designated until "the watershed is restored to a healthy functioning condition". The text has been changed to state that the ACEC would be designated until a determination is made by an interdisciplinary team that the Cottonwood and Diamond Watersheds are in propoperly functioning condition (PFC).

State of Utah - Public Lands Policy Coordination	120	70	Clarify launch limits in Westwater Canyon.	Table 4.69 (on pag. 4-207) states that the daily launch limit for Westwater Canyon is 75 people. This has been changed to state "75 people for the commercial sector and 75 people for the private sector". This equals the 150 person launch limit shown on the BLM website.
State of Utah - Public Lands Policy Coordination	120	71	The State is concerned that Wild and Scenic River designations may limit water development by communities for future growth, limit industrial and agriculutrual growth, and reduce funding for the Colorado River Salinity Control program.	TThe Wild and Scenic Rivers Act implies a Federal reserved water right; however, it must be the minimal amount necessary for purposes of the Act, it must be adjudicated through State processes, and it would be junior to existing water rights. The amount of Federal water right will vary from river to river, depending on the river's flows, the un-appropriated quantities in the river, and the values for which the river is being protected. There is no effect whatsoever on water rights on in-stream flows related to suitability findings made in a land use plan decision, barring Congressional action. Even if Congress were to designate rivers in the National Wild and Scenic Rivers System, any such designation would have no affect on existing, valid water rights. Section 13 (b) of the Wild and Scenic Rivers Act states that jurisdiction over waters is determined by established principles of law. In Utah, the State has jurisdiction over water. Although the Wild and Scenic Rivers Act implies a Federal reserved water right for designated rivers, it does not require or specify any amount, and instead establishes that only the minimum amount for purpose of the Act can be acquired. Because the State of Utah has jurisdiction over water, BLM would be required to adjudicate the right as would any other entity, by application through State processes. Thus, for Congressionally designated rivers, BLM may assert a Federal reserved water right to appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation.

				During the suitability phase of the Wild and Scenic River process, both Grand and San Juan Counties, as well as the State of Utah and SITLA, were asked to supply information on uses, “including reasonably foreseeable potential uses of the area and related waters, which would be enhanced, foreclosed, or curtailed if the area were included in the national system of rivers, and the values which could be foreclosed or diminished if the area is not protected as part of the national system.” (Appendix J-12). Attachment 4 of Appendix J summarizes suitability input by the public as well as local communities. Suitability decisions were made considering the results of this input. For example, the agricultural, residential, commercial and municipal development in and around the town of Green River was cited as a reason that segments 3 and 4 of the Green River were not suitable for consideration. In 1994, Public Law 98-569 amended the Colorado River Basin Salinity Control Act and directed the Secretary to develop a comprehensive program for minimizing salt contributions from lands administered by BLM and to provide a report on this program to the Congress and the Advisory Council. The BLM’s Colorado River Basin Salinity Control program is designed to provide the best management practices (BMP) of the basic resource base. Successes with the resource base will translate to improved vegetation cover, better use of onsite precipitation, and stronger plant root systems. In turn, a more stable runoff regime and reduced soil loss should result, thus benefiting water quality of the streams in the Colorado River Basin including the Green River and San Rafael River. In Section 1(b) of the Wild and Scenic Rivers Act, Congress states that one of the objectives of the Act is to protect the water quality of designated rivers. Congress further specified that the river-administering agencies cooperate with the EPA and State water

				pollution control agencies to eliminate or diminish water pollution (Section 2(c)). Comparing the two, it is clear that the Wild and Scenic Rivers Act and the Colorado River Basin Salinity Control Act are not only complementary of one another, but share the same objective with regard to water quality. The Wild and Scenic Rivers Act directs the Secretary of the Interior or any government agency to prohibit any loan, grant, license, or otherwise construction of any water resources project that would have a direct effect on the values for which such river designation was established. The law also states that it cannot preclude licensing of, or assistance to, developments below or above a wild, scenic, or recreational river area or on any stream tributary thereto that will not invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area on the date of designation of a river as a component of the National Wild and Scenic Rivers System. However, projects intended to comply with the Colorado River Salinity Control Act are those that would generally benefit stream segments instead of affecting or unreasonably diminishing its values including water quality.
State of Utah - Public Lands Policy Coordination	120	72	The State believes that the BLM should disclose the reasons and rationale for determinations of eligibility and suitability for proposed additions to the National Wild and Scenic River System, and to fully meet the requirements of state and federal law in doing so.	Appendix J of the DRMP/DEIS details the steps undertaken in the eligibility review process including the identification of outstandingly remarkable values as well as the Suitability Considerations by eligible river segments. The BLM complied with all applicable Federal laws, regulations, and policies in the Wild and Scenic Rivers Study Process. The BLM is aware that there are specific State laws relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA requires that BLM's land use plans be consistent with State and local plans “to the extent practical" where

				State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved. The BLM will identify these conflicts in the FEIS/PRMP so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options.
State of Utah - Public Lands Policy Coordination	120	73	The State is concerned that the Draft RMP/EIS does not state the authority for protection of river segments while studies are underway.	Section 5(d) of the Wild and Scenic Rivers Act requires that Federal land management agencies make wild and scenic river considerations during land use planning. Two stages of review are involved. Eligibility is an inventory, solely involving river values. Suitability involves consideration of manageability and resource conflicts. As per BLM Manual 8351-Wild and Scenic Rivers-Policy and Program, Section .32C, all eligible rivers are considered in the EIS for the planning effort as to their suitability for congressional designation into the National Wild and Scenic Rivers System. With any suitability determination made in the ROD for the PRMP/FEIS, the free-flowing, outstandingly remarkable values, and tentative classification of rivers would continue to be protected until Congress makes a decision on designation. Appendix J describes the process and authority for the Wild and Scenic Rivers Study. The FLPMA gives the BLM broad authority to manage the public lands, including management of eligible and suitable river segments. For eligible rivers, it is BLM's policy to protect certain values identified in the eligibility determination process to ensure that a decision on suitability can be made. To accomplish this objective, the BLM's management prescriptions must protect the free-flowing character, tentative classifications, and identify outstandingly remarkable values of eligible rivers according to the prescriptions and directions of the

				current, applicable land use plan per BLM Manual Section 8351.32C. The BLM Manual further states that should a determination on suitability not be made during the planning process, “the RMP must prescribe protective management measures to ensure protection shall be afforded the river and adjacent public land area pending the suitability determination” (Section 8351.33A). The NEPA specifies that while work on the EIS is in progress, BLM cannot undertake or authorize any actions in the interim that would prejudice the RMP decision or, in this case, the suitability determination (40 CFR 1505.1 (c)(3)). A case-by-case evaluation of potential impacts resulting from a proposed action must be made to ensure that all eligible rivers are not limited from being considered for suitability among the range of RMP alternatives, thus eliminating the opportunity to prejudice the decision. Implementation of the interim management to protect eligible rivers, therefore, is applied through site-specific NEPA analysis of environmental impacts on a case-by-case basis. The NEPA compliance, required for all Federal actions that could significantly affect the environment, ensures that BLM consider alternatives to the proposed action and provides BLM an opportunity to apply mitigation measures that will reduce impacts on a given resource such as an eligible stream. This mechanism of applying management must be in conformance with the current land use plan. Protective prescriptions would be applied to rivers determined suitable in the ROD for the Field Office RMP. Resource allocations (such as those for visual resources, OHV use, and mineral leasing) compatible with protecting river values would be prescribed for suitable river corridors as part of the decision. In addition, no special management objectives would be applied to eligible rivers determined not to be suitable in the ROD. Instead, they would be managed without additional consideration according to the provisions of the plan.

State of Utah - Public Lands Policy Coordination	120	74	The BLM has not sufficiently divulged the proposed management prescriptions for river segments identified in the Draft RMP/EIS.	Table 4.102, Management Proposed for River Segments Considered for WSR Designation by Alternative, details these management prescriptions. The Oil and Gas Leasing Stipulations detailed in Table 4.102 by river segment are applicable to all surface disturbing activities authorized in the plan as explained in Appendix C. These prescriptions have been moved to the Wild and Scenic River section of Chapter 2.
State of Utah - Public Lands Policy Coordination	120	75	Reference is made to 29 eligible segments that will be further reviewed for suitability; however, at several places, including pages 2-4, ES-5 and ES-6, 28 eligible sements are indicated. The Draft RMP/EIS identifies the number of eligible rivers as 13 at several places and 12 at many other locations.	There are 29 eligible river segments. On Salt Wash, which adjoins Arches National Park, the suitability determination has been delayed pending Park Service action. Therefore, 28 river segments were found suitable in one or more of the alternatives. This has resulted in some inconsistencies in the text which have been corrected. The same reasoning applies to the number of rivers which has also be corrected.
State of Utah - Public Lands Policy Coordination	120	76	The term "designation" in place of "classification" on pgs 2-4 and 2-91, is inappropriate.	The term "designation" has been changed to "determine" in accordance with the BLM Land Use Planning Handbook (H 1601-1).
State of Utah - Public Lands Policy Coordination	120	77	The cumulative effects analysis would be enhanced by developing a map depicting the cumulative effect of all use restrictions imposed under each alternative. Such a map could resemble maps 4-1 through 44 in the Kanab Field Office Draft RMP/EIS.	The maps referred to for the Kanab Draft RMP/EIS depict oil and gas restrictions by alternative. The same maps are contained in the Moab Draft RMP/EIS and are referred as Maps 2-5A-D. The oil and gas restrictions shown on these maps apply to all surface disturbing activities (see Appendix C). These maps have been referred to in the cumulative impact section for minerals (pg. 4-504) and other applicable resources.
State of Utah - Public Lands Policy Coordination	120	78	The BLM should clearly identify all reasonably foreseeable non-BLM actions within the planning area. As written, it is unclear what -- if any -- non-BLM actions were considered.	The BLM has added the following reasonably foreseeable non-BLM actions to the cumulative impact analysis: minerals extraction on private and SITLA lands; on going residential growth and business development throughout the planning area; and expansion of U.S. Highway 191.
State of Utah - Public Lands Policy Coordination	120	79	Please clarify the identification of alternatives. For example, pgs 2-2 through 2-5 identify Alternative A as th No Action Alternative, Alternative B as the Preferred Alternative, Alternative C as the Alternative	Our review of these sections shows that the terminology for the alternatives is consistent and is summarized as follows: Alternative A is No Action. Alternative B emphasizes

			emphasizing Resource Protection and Alternative D as the Alternative emphasizing Development. Page 4-1 identifies Alternative B as the Alternative emphasizing Resource Protection, Alternative C as the Preferred Altenraitve, and Alternative D as the Alternative emphasizing Development.	protection/preservation of natural resources. Alternative C is the Preferred Alternative, as it provides for a balanced approach of protection/preservation of natural resources while providing for commodity production. Alternative D emphasizes commodity production.
State of Utah - Public Lands Policy Coordination	120	80	Pages 2-2 through 2-5 indicates that under Alternative C, 31 percent of the MPA would be closed to oil and gas development and only five percent of the MPA would be open under standard lese terms and conditions. In comparison, Alternative B would close only 14 percent of the MPA and leave 48 percent of the planning area open under standard terms and conditions. However, Table 4-3 indicates that despite the less stringent stipulations applied under Alternative B, 2,652 fewer oil and gas wells are anticipated compared to the more restrictive Alternative C. Please clarify this discrepancy.	The only reference to oil and gas restrictions is Summary Table C which shows 370,250 acres closed to oil and gas development in Alt C. This amounts to 20 percent of the BLM lands within the planning area. It should be noted that 19% of the BLM lands within the planning area are closed to oil and gas leasing by BLM policy. Also, as shown on this table, 427,273 acres are open with standard lease terms and conditions for Alt C. This amounts to 23% of the BLM lands within the planning area. On the same table, Alt B closes 36% of the BLM lands and leaves 14% of the BLM lands open with standard terms and conditions. Table 4.3 shows the total predicted surface disturbance for mineral development in acres by alternative. The more restrictive Alt B results in 3,321 fewer acres (not wells) of surface disturbance than Alt C for oil and gas development.
State of Utah - Public Lands Policy Coordination	120	81	The BLM should designate OHV "training trails" near dispersed camp sites to reduce OHV damage in those area.	As stated in the Draft RMP/EIS (pg. 2-48) routes may be modified through subsequent implementation planning on a case by case basis. No specific trails or suggestions for "training trails" were submitted during the scoping period. After the RMP is completed and on a site specific basis, the BLM could consider training trails near dispersed camp sites in areas designated in the limited or open to OHV category.
State of Utah - Public Lands Policy Coordination	120	82	To avoid having routes closed in the future which cross properties owned by SITLA, rights-of-ways should be placed in public ownership for OHV access.	The BLM recognizes that under Utah v. Andrus the State is entitled to reasonable access across public lands to school trust lands, including those located within WSAs and other areas where management prescriptions would restrict general public access. Any restrictions such as

				route closures within these management areas pertain to general public access. Public access to OHV routes on public lands is accomplished through travel management planning. We make a distinction between closures to the public, and State access entitlements and access needs of others that can be addressed as specific needs arise. Land tenure adjustment efforts including pending and anticipated land exchanges between the BLM and the State should properly focus on SITLA lands located within WSAs and other special management areas identified in RMPs. Therefore, the BLM does not believe it is necessary or prudent to globally grant rights-of-way or designated routes to school trust lands for public use. The BLM is happy to work with the State to process any FLPMA Title V ROW application the State feels is necessary to protect ingress and egress to State property. The concern about DRMP/EIS access restrictions other than those for general public access, such as the designation of right-of-way avoidance or exclusion areas, can be clarified with specific mention in the PRMP/FEIS that these designations are subject to State access entitlements under Utah v. Andrus, as described above.
State of Utah - Public Lands Policy Coordination	120	83	The White Wash sand dunes OHV open area should be larger than proposed under Alternative C. There should be a larger mix of sand and slick rock with a logical boundary.	A larger OHV open area for the White Wash area is proposed in Alt D. A portion of this larger open area has been added to the PRMP/Final EIS which consists of the popular camping area to the west of the sand dunes and just east of the Ruby Ranch Road.
State of Utah - Public Lands Policy Coordination	120	84	The State asks the BLM to explain its intention to designate D roads, and explain why different D roads may be designated across alternatives. Please clarify the authority under which BLM would designate county roads, and what happens to a D road if BLM chooses not to designate it… pursuant to RS 2477.	See response to comment 120-16.
State of Utah - Public Lands Policy	120	85	Table 4.54 on page 4-147 indicates that, under Alternative C and D, no portion of Lost Canyon would be either "open" or subject to "limited" OHV use.	The limited acreage is identical in Alternatives B, C, & D. Table 4.54 has been corrected.

Coordination				
State of Utah - Public Lands Policy Coordination	120	86	Driving off designated routes to access dispersed camp sites would be in violation of the proposed travel plan. This plan should address this issue so that legitimate camp spots can be accessed from a legal route.	Driving off designated routes to access dispersed campsites would be a violation. Access to dispersed campsites is addressed on pg. 2-48 of the Moab DRMP/DEIS; “designated routes and spurs were identified specifically for dispersed camping” under all action alternatives. Many of the designated routes lead to or access dispersed campsites. Dispersed camping was considered in designating routes in all of the action alternatives. So that the public is aware of these sites, the dispersed campsites would be signed. Additional routes to dispersed campsites can be considered after the RMP process is completed on a case-by-case basis in areas designated as limited or open to OHV use.
State of Utah - Public Lands Policy Coordination	120	87	Duplicate routes may provide beneficial recreation experiences to OHV users of varying skills and interests.	No information was provided during the scoping phase identifying specific duplicate routes for consideration in this planning effort. During the development of the travel plan with Grand and San Juan Counties, consideration of these types of needs was discussed. However, most duplicate routes not designated were routes receiving little or no use and thus presumably not providing the experience suggested in the comment. After the RMP process is completed, additional routes can be considered on a case-by-case basis in areas designated as limited or open to OHV use.
State of Utah - Public Lands Policy Coordination	120	88	The BLM is encouraged to coordinate route alignments with other jurisdictions including the border with Colorado in the Rabbit Valley/Bitter Creek area.	During development of the travel plan, the Moab BLM coordinated with Grand and San Juan Counties, the National Park Service, the Forest Service, SITLA, and all adjoining BLM offices, including the Grand Junction Office concerning the Rabbit Valley area.
State of Utah - Public Lands Policy Coordination	120	89	There are a few additional connecting routes needed in the travel plan for Alt C to create loops for ATVs and full-sized vehicles	All route data received during scoping was considered in the alternatives for the travel plan. No specific information is provided about these "additional connecting routes". Any new routes can be considered for addition to the travel plan after the RMP is completed on a case by

				case basis in areas designated as limited to OHV use.
State of Utah - Public Lands Policy Coordination	120	90	There are no ATV/motorcycle only routes proposed in the preferred alternative. This is a useful designation to complete the array of OHV alternatives. The initial inventory and subsequent designation of motorcycle routes was inclomplete.	During the scoping period, the BLM received data on routes proposed for motorcycle use. The majority of these routes are included in the Travel Plan for Alt C or Alt D. During the comment period for the DRMP/EIS, some of the motorcycle route proposals were modified by their proponents to indicate that a few of these motorcycle routes were also suitable for ATVs. The map has been corrected in the PRMP/FEIS to delineate these ATV/motorcycle routes where they are identified in the Travel Plan for Alt C and Alt D. The BLM incorporated all route data received during scoping into formulation of travel plan alternatives.
State of Utah - Public Lands Policy Coordination	120	91	There are no designated routes in the Duma Point area under any of the alternatives and there is no explanation as to why these routes were omitted.	The BLM received several route submissions in the Duma Point area during the scoping period. Several of these routes were not identified in any of the action alternatives due to resource conflicts, particularly with big horn sheep and sensitive soils. The BLM received a comment from UDWR regarding the bighorn sheep herd in this area with respect to human disturbance. The BLM Manual 8342.1 requires that OHV designations must "minimize harassment of wildlife and/or significant disruption of wildlife habitiat".
State of Utah - Public Lands Policy Coordination	120	92	The State requests that the OHV riding area just north of the Airport on the Blue Hills Road remain open. The area is well-suited to the existing use (shale soils with no vegetation) and provides an authorized area for hill climbing.	The area described is actually west of the airport. This area was limited to existing roads and trails in the 1985 RMP due to concerns with sensitive soils. There are no identified routes within any of the alternatives for the travel plan. However, in Alt C, provisions are made for the Airport Hills Motorcross Focus Area (285 acres) to be established upon application by local government under the Recreation and Public Purposes Act.
State of Utah - Public Lands Policy Coordination	120	93	Please clarify whether page G-11's reference to wildlife habitat includes habitat for all species or is it intended to apply to habitat for more significant species or groups of species.	Page G-11 refers to the guidance found in BLM Manual 8342.1 which states that OHV designations "must minimize harassment of wildlife and/or significant disruption of wildlife habitat". On pg. G-25 BLM lists the relevant species considered in formulation of the alternatives for the travel plan.

State of Utah - Public Lands Policy Coordination	120	94	Page G-11, uses the term "extreme". Explain what constitutes an "extreme" hazard which can be considered an element of subjectivity.	This language is verbatim from BLM Manual 8342.1 which states "designations must minimize or eliminate OHV use in areas of extreme natural or man-made hazards".
State of Utah - Public Lands Policy Coordination	120	95	Page G-15, Emergency Limitation or Closure: Perhaps "immediately closed" should read, "immediately mitigated or closed" or some similar wording.	The Federal regulations at 8341.2(a) state "the authorized officer shall immediately close the areas affected to the types of vehicle causing the adverse affect". The wording on page G-15 is derived directly from the referenced regulations.
State of Utah - Public Lands Policy Coordination	120	96	The implementation process section on page G-29 should stress the need for maps and signing as both are needed.	On pg. G-30, the Draft RMP/EIS states "in the final RMP decisions, designated OHV routes will be portrayed by a map. This map will be the basis for signing and enforcement. The implementation goals include completing signage, maps, public information, kiosks, and working with partners".
State of Utah - Public Lands Policy Coordination	120	97	SITLA requests a detailed reference under Issue 8 of the Issues Identified for Consideration in the Moab RMP concerning inheld state lands within speical areas such as WSAs, ACECs, and lands managaged for wilderness characteristics.	See response to comments 120-101, 103, and 106. It is not necessary to have this specific language stated in the description of the issue.
State of Utah - Public Lands Policy Coordination	120	98	Section 1.3.3-Development of Planning Criteria (pg. 1-13). The BLM states that the RMP will "apply only to public lands and, where appropirate, split estate lands where the subsurace mineral estate is managed by the BLM". The BLM should reconsider whether it can impose its standard on split estate lands where it does not own the surface as mentioned in the Planning Criteria on pg. 1-13.	Information regarding leasing and development on split estate lands is found at the following Washington Office website: www.blm.gov/bmp/Split_Estate.htm. Instruction Memorandum No. 2003-202 outlines the policy, procedures and conditions for approving oil and gas operations on split-estate lands. In particular, the BLM will not consider and Application for Permit to Drill or a Sundry Notice administratively or technically complete until the Federal lessee or its operator certifies that an agreement with the surface owner exists, or until the lessee or its operator complies with Onshore Oil and Gas Order No. 1. Compliance with Onshore Oil and Gas Order No. 1 requires the Federal mineral lessee or its operator to enter into good-faith negotiations with the private surface owner to reach an agreement for the protection of surface resources and reclamation of the

				disturbed areas, or payment in lieu thereof, to compensate the surface owner for loss of crops and damages to tangible improvements, if any. In addition, the BLM will invite the surface owner to participate in the onsite inspection and will take into consideration the needs of the surface owner when reviewing the Application for Permit to Drill. The BLM will offer the surface owner the same level of surface protection BLM provides on Federal surface (Instruction Memorandum No. 89-201).
State of Utah - Public Lands Policy Coordination	120	99	Paragraph 3.6.2.1 - Land Tenure Adjustments (Pg. 3-28). This paragraph should specifically reference the need for Federal acquisition of State school trust lands that are captured by Federal reservations and withdrawals such as wilderness study areas will be a priority , in accordance with applicable BLM policy guidance. In addition State selection should be mentioned as an equally preferred method of land disposition as land exchanges.	See response to comments 120-106 and 120-11. The FLPMA Section 203 requires the BLM to use the land use planning process to identify lands for disposal through sales. Identifying lands for Section 203 sale requires BLM to meet certain criteria set out specifically in the statute. The FLPMA authorizes BLM to identify lands that would be available for exchange (both disposal and acquisition) more generally. The Moab DRMP/DEIS has identified lands generally available for exchange, including identifying State lands that are currently available for acquisition. The DRMP/DEIS does not contain a schedule or prioritize these lands, but BLM understands that State in-lieu and other exchanges are a high priority for the State and for BLM.
State of Utah - Public Lands Policy Coordination	120	100	Section 3.6.2.1.2-Exchanges and Acquisitions (pg. 3-29). The State encourages the BLM to add a new paragraph after the first paragraph, as follows: Facilitating acquisition of state trust lands inholdings in wilderness study areas and other sensitive areas through land exchange is considered an important public objective, and will be given priority.	See response to comments 120-106 and 120-11.
State of Utah - Public Lands Policy	120	101	Paragraph 4.1.2 - Analytical Assumptions (pg. 4-2/3). The BLM's second to last analytical assumtion, that non-BLM lands would be minimally directly impacted by	The BLM acknowledges that the closure of adjoining public lands to oil and gas leasing may have a potentially negative impact on SITLA's mineral revenue. The

Coordination			RMP decisions, since BLM does not make land decisions on non-BLM lands, is incorrect with respect to state trust lands. The largest source of revenue for the Utah school trust is from oil and gas bonuses and royalties. In much of Utah, in order to establish an economic oil and gas resource play, the exploration company needs a large areal footprint. It is likely that multiple sections would have to be leased and developed in order to develop the necessary reserves to make the play economic. BLM decisions from mineral lands from leasing in WSAs, areas with wilderness characteristics, ACECs, and other areas directly affect the economic viability of state trust lands inholdings.	assumption on pg. 4-3 has been changed to reflect this fact. In Alternative C, the closure of the 354,015 acres managed as WSA or Wilderness Areas is nondiscretionary and beyond the scope of this plan. In Alternatives A, C, and D there are no SITLA lands affected by discretionary closure. Chapter 4 of the PRMP/FEIS has been revised to reflect the impacts in Alternative B on SITLA inholdings of the discretionary closures of 266,485 acres of public land. It should be noted that under any Alternative, the proposed ACECs are not managed as closed to mineral leasing. Areas with wilderness characteristics are recommended as closed under Alternative B and No Surface Occupancy in Alternative C.
State of Utah - Public Lands Policy Coordination	120	102	BLM's last analytical assumption, that reasonable access to state lands , across BLM lands, would be provided under all alternatives, needs to be specifically repeated in Table 2.1 under the heading "Management Common to All Alternatives" with a notation that access to state strust lands will be granted even if an area is otherwise an avoidance or exclusion area for ROWs.	See response to comment 120-10.
State of Utah - Public Lands Policy Coordination	120	103	Section 4.1.3.1/Table 4.2-Oil and Gas. The BLM withdrawals and special designations directly affect development of oil and gas on SITLA lands. The BLM should assume that, in addition to the loss of oil and gas wells on BLM lands, there would be an additional loss of wells on SITLA lands in proportion to the amount of SITLA land within the proposed special designations under each alternative.	As explained in comment 120-101, the only discretionary oil and gas closures imposed by this plan that negatively impact SITLA inholdings are in Alt B where 266,485 acres are closed to protect wilderness characteristics. An estimate of oil and gas wells foregone on SITLA lands as a result of the BLM closure has been added to the text on pg. 4-94.
State of Utah - Public Lands Policy Coordination	120	104	Section 4.3.5-Lands and Realty (pgs. 4-63/69). The second paragraph of section 4.3.5.1 (Impacts Common to All Alternatives) incorrectly states that 354,015 acres within WSAs and the Black Ridge Wilderness Area are closed to surface disturbing activities and thus excluded to new ROWs.	Narrative has been added to the text on these pages to clarify that the BLM has an obligation to grant reasonable access to inheld State lands in WSAs subject to Utah v. Andrus and the Interim Management Policy. There are no State lands within the Black Ridge Wilderness Area.
State of Utah -	120	105	Section 4.3.12-Socioeconomic Resource (pgs 4-	See comments 120-101 & 120-103 for an explanation of

Public Lands Policy Coordination			252/277). BLM decisions to withdraw mineral lands from leasing (WSAs, etc.) directly affect the economic viablility of state trust lands inholdings. This should be acknowledged appropriately in the discussion of socioeconomic impacts. In particular, the BLM should assume that in addition to the decline in the number of wells drilled on BLM lands, there will be a proportionate decrease in the number of wells drilled on trust lands if Alternative B is adopted.	closed acreage by alternative. In Alt B, the loss of revenue from SITLA wells foregone has been calculated and added to the analysis on page 4-264.
State of Utah - Public Lands Policy Coordination	120	106	Appendix A.1.1. Land Tenure Adjustment Criteria. Add a new numbered paragraph stating that facilitating acquisition of state trust lands inholdings in wilderness study areas and other sensitive areas through land exhange is considered an important public objective, and will be given priority in accordance with existing BLM policy direction.	Current BLM Utah State Policy is to give priority to State of Utah exchanges and such exchanges do not require a land use planning decision.
State of Utah - Public Lands Policy Coordination	120	107	Delete numbered paragraph 9 in A.1.1. It is inconsistent with county plans and may hinder necessary exchanges to acquire state inholdings.	This paragraph refers to retaining 1,806,413 acres in public ownership including all lands in WSAs, ACECs, SRMAs, and other designated areas. This paragraph has been restated as follows: "Retain all public lands within WSAs, ACECs, SRMAs, and other designated areas".
State of Utah - Public Lands Policy Coordination	120	108	Please consider adding a new section, A.1.5, State Selections, which should read as follows: "State selections under the Utah Enabling Act and other applicable law will also be given prioity pursuant to BLM Manual 2621.06A-C. All lands not encumbered by a withdrawal or other special designation will be available for state selection."	See the response to comment 120-106.
State of Utah - Public Lands Policy Coordination	120	109	Under the Mill Creek Canyon Potential ACEC, Alternatives B and C propose to "maintain 3 cfs in the South Fork of Mill Creek below the Shelly diversion" (pg. 2-37). Please explain whether BLM possess a water right applicable to this area, how BLM would maintain this level of flow at the Shelly diversion, how it would prevent appropriation of instream flows below this point, and who would hold instream flow rights.	The BLM does not have instream flow rights on Mill Creek. The BLM would maintain 3 cfs through a stipulation in the right-of-way grant to the Grand County Water Conservancy District. The BLM does not control appropriation of water rights. Water rights are appropriated by the State of Utah. In Utah, the only agencies that can hold instream flow rights are the UDWR and the Utah State Parks.

State of Utah - Public Lands Policy Coordination	120	110	The enhancement of riparian and wetland areas will increase the depletion of water within the Moab FO. The State requests the BLM modify its goal to require mitigation of any increased water depletion that may result from its activities. Such mitigation may require the acquisition and change of a valid existing water right. As part of a mitigation effort, it is suggested the BLM consider the institution of a program to eradicate tamarisk and other highly water consumptive, non-native species and their replacement with native species. Water required for any enhancement effort will need to be obtained in accordance with State law.	Restoration of riparian vegetation will not result in water depletion. In fact, this activity should increase the amount of available water. Enhancing riparian vegetation results in a decrease in stream temperature, a decrease in evaporation, and the storage of water in the bank for low flow seasons (summer). In addition, the replacement of tamarisk and Russian olive by native vegetation results in reduced water use and higher stream flow. If any additional water should become necessary, the BLM will obtain this water in accordance with Utah State law. On pg. 2-50 under Management Common to All for Vegetation, it states "Reduce tamarisk and Russian olive where appropirate using allowable vegetation treatments. Restore riparian habitat to native willow and cottonwood communities".
State of Utah - Public Lands Policy Coordination	120	111	The UDWQ suggests the following practices identified in the TMDL that would reduce Mill Creek water temperatures to bring conditions into compliance with standards for Class 3A waters. These practices include: 1) provide higher stream flows during summer by maintaining 3 cfs flow below the Ken's Lake diversion, 2) increase water depth by narrowing the stream channel with restoration techniques involving use of heavy equipment, and 3) plant and protect riparian vegetation to increase shading a minimum of 11 percent to attain water quality standard.	The Draft RMP/EIS on pg. 2-31 states under Management Common to All Alternatives for Soils and Watershed: "Coordinate with Grand Water and Sewer Service Agency to ensure required minimum instream flow of 3.0 cfs in Mill Creek below the Sheley diversion". Through ongoing restoration and management actions stream channel dimensions are improving without the use of heavy equipment. The use of heavy equipment is not appropriate due inaccessibility, the size of the stream system, and other sensitive resources. On pg. 2-50 under Management Common to All for Vegetation, the Draft RMP/EIS states "Reduce tamarisk and Russian olive where appropirate using allowable vegetation treatments. Restore riparian habitat to native willow and cottonwood communities". Mill Creek has been and will continue to be a high priority for such restoration efforts due to its TMDL status.
State of Utah - Public Lands Policy Coordination	120	112	Onion Creek is impaired for temperature. To attain a temperature reduction in Onion Creek, the TMDL recommends restricted access to the stream channel by off road vehicles and riparian restoration to facilitate	Under all alternatives, travel within the Onion Creek stream corridor is restricted to the "B" road. Riparian restoration in this area has been ongoing; as a TMDL, Onion Creek is a priority for restoration efforts. In

			canopy cover. To restore the beneficial use in the creek, a more protective alternative than those described by the BLM/Moab RMP may be required.	addition, the BLM has worked with the Grand County Road Department to improve the stability of the "B" road, thus improving riparian and water quality conditions in Onion Creek.
State of Utah - Public Lands Policy Coordination	120	113	Ken's Lake should be protected for cold water species of game fish and other cold water aquatic life. It is impaired for temperature. The protection of riparian vegetation may improve conditions around the lake.	The Ken's Lake TMDL concludes that stream temperatures are appropriate for the beneficial uses. The impairments are due to natural conditions and not management actions. Ongoing recreation management efforts for Ken's Lake have involved promoting native vegetation.
State of Utah - Public Lands Policy Coordination	120	114	Best Management Practices should be included in the plan for impaired water bodies.	The BLM is adopting the State's TMDL recommendations for impaired waterbodies. These constitute the best management practices for those streams.
State of Utah - Public Lands Policy Coordination	120	115	Monitoring should be defined for the plan, including water quality and biological parameters. Monitoring of recreation events should also be conducted to help provide data of the impacts.	The Federal regulations at 43 CFR 1610.4-9 require that land use plans establish intervals and standards and evaluations based on the sensitivity of the resource decisions involved. The Record of Decision (ROD) for the RMP will commit to a monitoring plan the specifics of which will be developed subsequent to the signing of the ROD.
State of Utah - Public Lands Policy Coordination	120	116	A statewide social survey was conducted by Utah State University in 2007. The State provides the key survey results for Grand County (146 responses) and for San Juan County (124 responses).	The commentor provides an additional source of data not considered in the Draft RMP/EIS, due to the unavailability at the date of publication. The commentor has identified this data as preliminary and no conclusions are provided. This is a study done by Utah State University for the State of Utah (USU). The USU study surveyed residents of all Utah counties on an equal (equal sample size per county) basis. The commentor has not provided BLM with the raw data, but has compiled summary statistics by county. The survey is described as a social survey, and it "attempts to assess the ways in which Utah residents use and value public land resources, and their views about public land management". Because it is a survey of a sample of the population, the results are not directly comparable to most of the state government agency-generated data used in the Draft RMP/EIS. Portions of

				the study do not distinguish among types of public lands; in the study, this label includes all state and Federal lands, and not just BLM lands. This makes some of the results more difficult to use in BLM planning and analysis since both counties in the MPA contain significant amounts of state, NPS and USFS lands. Nonetheless, the study provides interesting results not available elsewhere, and the summaries for Grand and San Juan counties incorporated in Attachment B may be useful in future implementation actions. None of the results provided affect either the formulation of alternatives in Chapter 2, nor the analysis of impacts in Chapter 4. Where appropriate, pertinent results are incorporated in Chapter 3 of the PRMP/FEIS.
San Juan County	121	1	The BLM 's interpretation of the Multiple Use mandate where all uses occur someplace but not togetether is flawed. Landscapes can be managed so that a broad spectrum of resource uses can create social, economic and ecological wealth simultaneously. Multiple use management results in benefits to various resources. For example, grazing can be a tool to benefit wildlife and their habitats.	In developing land use plans, the BLM is mandated by FLPMA to observe the principles of multiple use and sustained yield. FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people…..the use of some land for less than all of the resources, a combination of balanced and diverse resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources….with consideration given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output". The final land use plan for the Moab Field Office will define multiple use for this area.
San Juan County	121	2	More emphasis should be placed on monitoring the plan decisions both to measure the results of the plan and to insure that actions are taken to incorporate any changes needed. Watershed function, livestock use, recreation, OHV use and wildlife populations are uses that should be monitored more closely. The plan should	The Federal regulations at 43 CFR 1610.4-9 require that land use plans establish intervals and standards and evaluations based on the sensitivity of the resource decisions involved. The Record of Decision (ROD) for the RMP will commit to a monitoring plan the specifics of which will be developed subsequent to the signing of the

			have greater flexibility to adapt to changing conditions.	ROD.
San Juan County	121	3	San Juan County asks for more cooperation and collaboration with local, state, and federal agencies (as well as interest groups) in actions and decisions within the Field Office. Misunderstandings could then be worked out in advance -- in the field rather than the courtroom. Within the framework of this RMP, the BLM should provide more opportunities to facilitate cooperative relationships and foster better collaboration efforts.	The State of Utah, Grand County, and San Juan County are cooperating agencies involved in the preparation of the RMP. The BLM has involved the cooperating agencies in all aspects of the land use planning process including participation in the interdisciplinary team meetings. Cooperation and collaboration will continue on site specific projects after the RMP is completed and this does not require a plan decision to accomplish.
San Juan County	121	4	San Juan County feels more emphasis should be placed on sustaining and developing healthy watersheds. The functionality of watersheds underlies all resources values. The best way to improve the functionality of watersheds is by increasing the ground cover. Well managed grazing is one of the best, most economical, large scale tools for increasing ground cover.	The BLM actively supports efforts to improve watersheds. The BLM is a partner in the Healthy Lands Initiative for Utah. The RMP, under all action alternatives, specifies that restoration efforts be undertaken in cooperation with the Utah Partners for Conservation and Development (pg. 2-50). The RMP, under all alternatives, also specifies that grazing would be managed according to the Guidelines for Livestock Grazing Management to meet the Standards for Rangeland Health. Implementation of these standards would improve watershed health and functioning.
San Juan County	121	5	San Juan County supports livestock grazing in a prescriptive manner to accelerate progress toward improved rangeland health and reduction of catastrophic fire. The BLM should reassess timing and season of use for grazing.	The BLM Land Use Planning Handbook (H-1601-1) requires the BLM to identify lands available or not available for livestock grazing. This is the only planning decision within the RMP. Decisions concerning timing and season of use are made on an allotment basis using the Standards for Rangeland Health and Guidelines for Grazing Management.
San Juan County	121	6	San Juan County feels that social/economic analysis for livestock grazing is inadequate, as many allotments have been reduced or closed. The county urges BLM to look at grazing on a watershed basis vs. an allotment basis so that livestock operations would have opportunities to be more profitable but also to benefit wildlife and other resources.	Only one livestock allotment is proposed under any alternative for non-availability in San Juan County (Mill Creek: 3,921 acres). Of those proposed for non-availability (including those in Grand County) under Alt C, only Mill Creek is available for grazing now. Most of the other allotments have been unavailable for grazing since 1994, and some since the 1985 Grand RMP. The socioeconmic impacts of lost grazing opportunities is analyzed on pg. 4-258.

				Decisions concerning numbers of livestock and seasons of use are made on a allotment basis using Standards for Rangeland Health and Guidelines for Grazing Management during the permit renewal process.
San Juan County	121	7	San Juan County supports Alt C for travel management. The county wants the BLM to highlight specific prescriptions to promote responsible use, such as areas that would be highlighted for OHV use, maps, signing, kiosks etc. In addition, BLM does not mention impacts from hikers or mountain bikers.	The RMP proposes many areas to be focus areas or SRMAs emphasizing responsible motorized use. These include Cameo Cliffs SRMA, Gemini Bridges/Poison Spider Mesa Motorized Touring Area, Utah Rims SRMA, Dee Pass Motorized Trail Area, and the Airport Hills Moto Cross Area. These areas are proposed for specialized management emphasizing that activity. The RMP would designate these areas but a Recreation Area Management Plan will follow the RMP, where specific prescriptions suggested by the county would be detailed. The Travel Plan (Appendix G, pg. 30) details mapping, signigng, and construction of kiosks as actions that would be part of implementation of this Plan. Mountain bikes are restricted to the designated route system under all action alternatives. Impacts of mountain bikes vs. motorized travel were not separated out in the discussion. All impacts of off-route travel were combined for all types of wheeled vehicles. The impacts of hikers were not considered because no decision in this plan requires hikers to stay on trail.
San Juan County	121	8	BLM erroneously uses the term critical habitat (defined as applicable only to threatened and endangered species). This error occurs on Maps 2-27 B and C/D, on pages 3-169 and 3-171 and on page N-6. The term crucial habitat is used too loosely; UDWR uses crucial habitat as descriptive designations. They are not intended to mislabel resource concerns and result in a limitation of compatible uses. San Juan County disputes the acreage identified for crucial elk and deer winter range in San Juan County and submits information from Dr. Charles Kay in that regard.	Maps 2-27B and C/D refer to the term crucial winter range and the term critical is not used. The term critical is used erroneously on pgs. 3-32, 3-38, 3-39, 3-40, 3-125, 3-127, 3-169, 3-171, 3-174, 3-177, and N-6. This term will be changed to crucial in the final RMP/EIS. The UDWR is the jurisdictional agency for wildlife management within the State. The BLM relied on the expertise of this agency for delineating wildlife habitats, estimating population numbers, and recommending wildlife restrictions.

				Also, refer to comment response 121-39.
San Juan County	121	9	San Juan County is opposed to "layering" or the establishment of ACECs or SRMAs over WSAs or Wild and Scenic Rivers.	“Layering” is planning. Under FLPMA’s multiple use mandate, BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple use concept, the BLM doesn’t necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands. The process of applying many individual program goals, objectives, and actions to the same area of public lands may be perceived as “layering”. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Inconsistent goals and objectives can lead to resource conflicts, failure to achieve the desired outcomes of a land use plan, and litigation. Whether or not a particular form of management is restrictive depends upon a personal interest or desire to see that public lands are managed in a particular manner. All uses and values cannot be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses can be considered together to determine what mix of values and uses is responsive to the issues identified for resolution in the land use plan. Layering of program decisions is not optional for BLM, but is required by the FLPMA and National BLM planning and program specific regulations. FLPMA directs BLM to manage public lands for multiple use and sustained yield (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and

				prescribe land uses through its land use plans. BLM's Land Use Planning Handbook requires that specific decisions be made for each resource and use (See, Appendix C, Planning Handbook "H-1601-1"). Specific decisions must be included in each of the alternatives analyzed during development of the land use plan. As each alternative is formulated, each program decision is overlaid with other program decisions and inconsistent decisions are identified and modified so that ultimately a compatible mix of uses and management prescriptions result. For example, the BLM has separate policies and guidelines as well as criteria for establishing Areas of Critcal Environmental Concern (ACECs) as when the Wilderness Study Areas (WSAs) were established. These differing criteria make it possible that the same lands will qualify for both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies. The values protected by WSA management prescription do not necessarily protect those values found relevant and important in ACEC evaluation, and vice versa. The relevant and important values of ACECs within or adjacent to WSAs were noted in the ACEC evaluation (Appendix I). The ACECs are evaluated and ranked based on the presence or absence of the stated relevant and important values. None of these values include wilderness characteristics. Additionally, the management prescriptions for the ACEC are limited in scope to protect the relevant and important values and the BLM maintains that the size of the ACEC areas is appropriate to the relevant and important values identified. SRMAs are not restrictive of resource uses but rather are utilized to control recreation use. The South Moab

				SRMA does overlay the Mill Creek and the Behind the Rocks ACECs, but the management proposed in each is for differing purposes. Please see Response 120-64
San Juan County	121	10	Managing Non-WSA Lands for so-called wilderness chracteristics violates FLPMA, Utah Code 63-38d-401(6)(b), the San Juan County master plan, the Norton-Leavitt Agreement and other agreements.	The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially

				similar to the manner in which such lands are protected as WSAs. The BLM is aware that there are specific State laws relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA requires that BLM's land use plans be consistent with State and local plans “to the extent practical” where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved. The BLM will identify these conflicts in the FEIS/PRMP so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. Finally, the Utah v. Norton Settlement Agreement does not affect BLM’s authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.
San Juan County	121	11	In the analysis of the impacts for the Draft RMP/EIS, almost all the impacts are attributable to OHV use, oil and gas use, and, to some extent, grazing. The underlying theme is that these 3 things are the cause of all negative impacts and if they are elimanated or contolled then everything else is take care of. The BLM should consider cheat grass and juniper encroachment, invasive weed problems, and catastrophic fires. The BLM should utilize livestock to control invasive plants.	In the Draft RMP/EIS surface disturbing activities are considered potential negative impacts to natural and cultural resources. On page C-1, surface disturbing activities are defined. Surface disturbing activities include, among many other things, oil and gas development and cross country OHV use. Neither grazing nor vehicle travel on vehicular routes are defined as surface disturbing activities. On pg. 2-50 in decisions common to all action alternatives, the BLM specifies controlling and reducing invasive and noxious weed species. Vegetation

				treatments areas for pinyon-juniper area are identified on pg. 2-14. On an allotment basis, Standards for Rangeland Health and Guidelines for Grazing Management could be utilized to control invasive species.
San Juan County	121	12	San Juan County commends the BLM for the effort that has been expended to better understand and portray socioeconomic impacts in this DRMP. This has been a weakness in previous plans. San Juan County encourages BLM to use studies done by Utah's universities to enhance this information such as the social survey undertaken by USU and the economic studies done by the U of U. Every NEPA action in the RMP should include a discussion on socioeconomic conditions and fully disclose all impacts.	The BLM has reviewed the Utah State University survey of rural counties conducted by the State of Utah. The BLM has received preliminary data from this study received after completion of the Draft RMPM/EIS. The BLM has incorporated findings in the PRMP/FEIS as appropriate. The BLM has incorporated findings from recent research completed by the University of Utah's Bureau of Economic and Business Research into the PRMP/FEIS. On a broad land use planning level, the BLM has disclosed the socioeconomic impacts from various resource actions as discussed in Chapter 4 of the DRMP/EIS. It is not practical to separate out the socioeconomic impacts of the many resource decisions specified in the plan.
San Juan County	121	13	San Juan County is opposed to relinquishment of preference or retirement of grazing rights in favor of conservation (p. 2-12). BLM should clarify goals in encouraging relinquishment and what would happen to voluntarily relinquished AUMs if BLM proposes to retire AUMs. What mechanism would be used to retire grazing rights?	The BLM does not encourage or discourage relinquishment of grazing preference. The BLM policy concerning the voluntary relinquishment of grazing preference is included on pg. 2-12 of the DRMP/EIS. As stated in this policy, relinquished permits and the associated preference would remain available for application by qualified applicants after the BLM considers if such action would meet rangeland health standards and is compatible with achieving land use plan goals and objectives. Upon voluntary relinquishment, the BLM may determine through site specific evaluation and associated NEPA analysis that the public lands involved are better used for other purposes… any decision issued concerning discontinuous of livestock grazing is not

				permanaent and may be reconsidered and changed through future land use plan amendments.
San Juan County	121	14	Alternatives B and C should not favor a single use regarding vegetation treatments, but should benefit multiple use objectives (p. 2-14).	In the Draft RMP/EIS (pg. 2-14), Alt D specifically favors livestock grazing in conducting vegetation treatments. Alt C specifies vegetation treatments that would benefit multiple use obectives including livestock grazing and wildlife as well as watershed health. Alt B specifies vegetation treatments to benefit wildlife, watershed, soils, and riparian health. Multiple use is defined by FLPMA as 1) the use of some land for less than all of the resources, and 2) a combination of balanced and diversed resource uses that takes into account the long term needs of future generations for renewable and nonrenewable resources.
San Juan County	121	15	BLM should give due consideration to the most efficient program for the development of oil and gas resources in favor of exclusionary management for other uses. BLM is using exclusionary management for non-WSA lands with wilderness characteristics, ACECs and wildlife areas.	Alt B of the Draft RMP/EIS favors the protection of resources over the extraction of mineral development. Alt D favors mineral development over protection of resources. Alt C is designed to be a balance between mineral development and protection of resources. There are no "exclusionary areas" proposed in the Draft RMP/EIS for Alt C within San Juan County for oil and gas. There are no ACECs or non-WSA lands with wilderness characteristics proposed for Alt C within San Juan County. Only timing restrictions for wildlife are proposed in Alt C within San Juan County.
San Juan County	121	16	The socio-economic analysis for oil and gas is inadequate. A study in Unitah County found that oil and gas account for 60% of total wages, with the average wage of an oil worker at $84,795.	On pg. 4-264 of the Draft RMP/EIS it is stated that employment related to oil and gas development would be less under Alt B. The effects on employment and wages have been added to Chapter 4 of the PRMP/EIS.
San Juan County	121	17	Please explain how the extremely restrictive Alt. B would have only slightly lower economic benefits. Many of the new restrictions on oil and gas proposed in this RMP are not warranted. BLM should make reasonable adjustments in the preferred alternative.	The fiscal impacts have been described in Table 2.2 on pg. 2-78 (DRMP/EIS) in terms of royalty revenue. This table shows that royalty revenues will be reduced by 50% in Alt B. In addition property tax revenue, and severance tax data have been added to the table for the PRMP/FEIS and likewise show a 50% reduction in revenues in Alt B as compared to Alt C.
San Juan County	121	18	BLM should not manage lands for wilderness characteristics, taking into account the Utah v. Norton	Refer to response to comment 121-10. No non-WSA lands with wilderness characteristics are proposed for

			settlement, the opinions of local governments and residents, the existence of inholdings and valid existing rights, and the existence of SITLA lands. BLM has ignored county travel route and intrusion information in the 1999 wilderness inventory. BLM should clarify the difference between "natural", "largely natural", and "generally natural", and define "allotment files" and "master title plat data".	management in Alt C for San Juan County. County travel route information was utilized in the Travel Plan and in the selection of non-WSA lands for the preferred alternative. For impacts to SITLA lands refer to response to comments 120-101 and 120-103. The terms specified for clarification are taken from the 1999 WildernessInventory and can not be changed at this time.
San Juan County	121	19	Will future "recreation area management plans" and "river management plans" be subject to NEPA. What is the process for developing and approving these plans?	After completion of the RMP process, those SRMAs that do not currently have RAMPs will need to develop a site specific RAMP, subject to full compliance with the NEPA. The process is identical for River Management Plans.
San Juan County	121	20	The Draft RMP/EIS states that where a specific focus area is not identified with a Special Recreation Management Area, the focus of that area is motorized, backcountry touring on designated roads. This statement appears to indicate that those portions of SRMAs that are not subject to a more specific focus area will be managed to emphasize motorize recreation. This appears inconsistent with designating SRMAs to emphasize non-motorized recreation and mountain bike backcountry touring. Please also explain haw management of focus areas specifically designated for "motorized backcountry touring" would differ from the default management of SRMA for motorized backcountry touring.	See response to comment 120-67.
San Juan County	121	21	The Draft RMP/EIS makes repeated reference to "destination SRMAs" (pg. 2-19). Please explain what a "destination SRMA" is and how such areas would be managed.	See response to comment 120-68.
San Juan County	121	22	The Mill Creek Canyon Potential ACEC. San Juan County is opposed to protecting wilderness characteristics and layering. Alt. D best describes this unit.	Alt C proposes no management to protect wilderness or wilderness characteristics within the Mill Creek Potential ACEC. Of the 3,721 acres in this ACEC in Alt C, 1,474 acres are within San Juan County. Alt. B contains 295 acres of non-WSA lands with wilderness characteristics within San Juan County. Of

				these acres, all are within the Mill Creek Potential ACEC as outlined in Alt. B.
San Juan County	121	23	Alternatives B and C propose to "maintain 3 cfs in the South Fork of Mill Creek below the Shelly diversion" (pg. 2-37). Please explain whether BLM possess a water right applicable to this area, how BLM would maintain this level of flow at the Shelly diversion, how it would prevent appropriation of instream flows below this point, and who would hold instream flow rights.	See response to comment 120-109.
San Juan County	121	24	Wilson Arch Potential ACEC. This should be dropped in all alternatives because of surrounding private land. The area should be VRM Class III in all alternatives. The arch should be protected with a hiking trail up to it.	The Wilson Arch Potential ACEC is proposed only in Alt. B. The potential ACEC meets the relevance criteria and must be included in 1 alternative. The area is managed as VRM II in Alt C, providing protection to the arch, and managed as VRM III in Alt. D, providing virtually no protection to the arch.
San Juan County	121	25	Southwestern Willow Flycatcher. What is their habitat? There is no map provided.	The Southwestern Willow Flycatcher is an endangered species; the U. S. Fish and Wildlife Service has not mapped their critical habitat within the Moab Field Office boundaries. The USFWS defines their breeding habitat as dense riparian tree and shrub communities associated with rivers, swamps, and other wetlands (USFWS Recovery Plan, Southwestern Willow Flycatcher).
San Juan County	121	26	Are there any Gunnison sage grouse leks within the MPA? Will the restrictions be imposed whether or not the grouse are present?	There are currently no Gunnison sage grouse leks or occupancy within the MPA. On page 2-47, the Draft RMP/EIS states: "If sage grouse occupancy is identified, the stipulations would be imposed as follows:" Thus, stipulations would only be imposed if the grouse are present.
San Juan County	121	27	VRM Management appears to be the same for Alts C and D within San Juan County. San Juan County would like Shafer Basin managed as VRM I, Mill Creek managed as VRM II and the rest of San Juan County managed the same as Alt. A. BLM should adjust Alt. C.	Alts C and D are not identical within San Juan County, with 15,326 acres managed as VRM I, 65,273 acres of VRM II, 116,101 acres of VRM III, and 96,471 acres of VRM IV within the county in Alt C and 6,316 acres of VRM I, 42,887acres of VRM II, 147,496 acres of VRM III and 96,471 acres of VRM IV within the county in Alt D. In Alt C, Shafer Basin is managed as VRM I, and the areas around Mill Creek are managed as VRM II.

				The 1985 Grand RMP did not manage for VRM. However, in 2002, a plan amendment was completed for the Canyon Rim Recreation Area, which is managed as VRM II and III. All WSAs, including Behind the Rocks WSA within San Juan County, are managed as VRM I. However, in Alt A, the remainder of San Juan County has no VRM management. This is not an option for the revised RMP.
San Juan County	121	28	San Juan County disputes the acreage identified for crucial elk and deer winter range in San Juan County. San Juan County asks that Alt. A coverage be used for deer and elk winter range. Prescriptions should be added to the alternatives to allow for collaborative monitoring and studies conducted that will allow for habitat designations to be biologically and scientifically based.	The BLM relied on UDWR, the agency with jurisdictional expertise regarding deer and elk. In the 1985 Grand RMP, the BLM did not impose restrictions on the entire deer and/or elk habitat (approximately 110,000 acres) delineated by UDWR within San Juan County. Restrictions were only imposed on about 4,000 acres of this habitat. A prescription in the alternatives is not necessary in order to allow for collaborative monitoring and studies.
San Juan County	121	29	The term "critical" is used inappropriately for wildlife habitats on the following pages: p. 3-38, 3-39, 3-169 (in Table 3.52), 3-171. Critical is used only for 'sensitive species' habitat.	These terms have been corrected in Chapter 3 of the PRMP/FEIS.
San Juan County	121	30	"Competition between deer and livestock" (pg. 3-38) is used inappropriately because both livestock and deer should be managed under an allocation system for both.	This statement is only intended to clarify the uses occurring on the Between the Creeks allotment.
San Juan County	121	31	With over 300,000 vehicles per year, are there conflicts between people and habitat for desert bighorn, bald eagle, SWWF, T and E fish, peregrine falcon and other sensitive raptors; since the RMP states that there are conflicts between people and livestock on the Professor Valley, River and Ida Gulch allotments (pg-3-39).	The conflicts between the vehicles and the livestock are in the form of vehicle collisions with cattle. Utah State Highway 128 does not cross desert bighorn habitat, and there have been no collisions between vehicles and the other species listed.
San Juan County	121	32	There is a discrepancy between Tables 3.56 and 3.57 on DWR population objectives for elk. BLM should clarify or correct this. San Juan County questions the accuracy of DWR's elk counts.	Tables 3.56 and 3.57 have been changed to correct the discrepancies.
San Juan County	121	33	BLM should remove the crucial winter range for elk in San Juan County, including all prescriptions, impacts,	Throughout the DRMP/EIS, the reference to "deer and elk habitat" has been replaced with "deer and/or elk" habitat.

			environmental consequences, etc. from the DRMP (pg. 3-173).	Since the prescriptions and environmental consequences for the two animals are very similar, the habitats were considered together.
San Juan County	121	34	Pronghorn do not use pinyon juniper habitat. Correct this inconsistency in Table 4.138 on page 4-442.	Pronghorn do utilize pinyon juniper habitat occassionally but their primary habitat is sagebrush/perennial grass. This has been corrected in Table 4.138.
San Juan County	121	35	BLM has presented no data that would justify range extensions for mule deer, elk, bighorn sheep or antelope. BLM assumes that habitat is the most important factor limiting ungulate popularions, but data from studies indicate that numbers are limited by predation.	UDWR is the agency with jurisdictional authority for mule deer, bighorn sheep, elk, and antelope. The BLM relies on the UDWR for their expertise regarding habitats. The BLM does not have any authority to regulate predation.
San Juan County	121	36	Much of the area listed as antelope/kidding habitat on Map 2-25 is seldom actually used by antelope. The failure of antelope to increase in numbers are due to factors other than habitat , such as low fences in the southern end of the area and predation. Unless BLM can produce data showing that the area is heavily used by antelope, multiple use activities should not be restricted.	The BLM has not restricted multiple use activities due to the existence of antelope habitat in San Juan County. A minor timing restriction (45 days) for surface disturbing activities is imposed on antelope habitat during kidding periods. This timing restriction is within the standard operating procedures for oil and gas activities. UDWR is the agency with jurisditional authority for predator control. The DRMP/EIS states on pg. 2-53 "Construct fences that allow for pronghorn passage and dismantle uneeded fences" in pronghorn habitat.
San Juan County	121	37	BLM proposes an increase in bighorn sheep habitat over that proposed in the 1985 RMP. Much of the area proposed is seldom visited by bighorns, as they are never far from escape terrain. Studies have shown that hikers have a greater negative impact on desert bighorns than do motorized users. Predation is the key limiting factor on bighorn, an issue not addressed in the DEIS.	Only the Shafer Basin (within San Juan County) was proposed as bighorn habitat in 1985. The addition of bighorn habitat delineated by UDWR within San Juan County is along the rims of Canyon Rims, and in the Hatch Wash area. The majority of the bighorn habitat is within 0.5 to 1 mile from escape terrain. The BLM is aware of the studies that document the impact of hikers on bighorn sheep. Permitted hiking is restricted on a case by case basis within bighorn habitat under the issuance of Special Receration Permits as stated on pg. 2-30 of the DRMP/EIS. UDWR is the agency with jurisditional authority for predator control.
San Juan County	121	38	BLM has combined deer and elk habitat throughout the analysis. This should be corrected for the following reasons: habitat manipulations that favor elk do not	The BLM combined deer and elk habitat for the purposes of analysis. On pg. 4-442, the DRMP/EIS states "Mule deer and elk habitat have been combined in an attempt to

			benefit mule deer; elk are above herd objective and need to be reduced; combining habitats is a way to increase elk numbers; BLM ignores the fact that elk will displace mule deer; elk and deer respond differently to development and human use, with elk being more easily displaced than deer; Monticello BLM maps deer and elk habitat spearately; there is no elk use on BLM land that BLM wants to classify as "crucial habitat" in San Juan County	simplify the management of their closely overlapping ranges…Further discussions and analyses will consider the two species together". The BLM chose to map deer and/or elk habitat on the same map to simplify readibility. In the PRMP/FEIS the habitats will be delineated separately on a map. However, throughout the PRMP/EIS the wording has been changed from "deer and elk" to "deer and/or elk". The BLM acknowledges that elk are not found on every acre of deer habitat. The land use plan provides for broad landscape level planning prescriptions. These habitats will be separated for analyses on a site specific project level. UDWR has the jurisdictional authority for population objectives of big game species.
San Juan County	121	39	The 1985 Grand RMP designated only a small area near the LaSal Mountains as habitat for mule deer. The BLM wants to propose an increase with no justification. San Juan County's study (undertaken in the Spring of 2006) found little mule deer use south of East Coyote Wash. BLM ignored these data. Additionally, there is virtually no elk use, except at Lackey Fan and on Three Step Hill. Calling the area deer and elk winter range is without merit. BLM should produce data south of East Coyote Wash to show that this is crucial deer or elk winter range.	UDWR has the jurisdictional authority for the identification of deer and elk habitat. The BLM relied on this expertise. As stated in response to comment 121-38, the BLM has corrected the wording of the habitats to read "deer and/or elk habitats".
San Juan County	121	40	BLM should not use the phrase "a thriving natural ecological balance" because it does not know what "natural" is (p. 2-5). On Map 2-20, "historic habitat" for sage grouse is identified as "pre-setttlement" habitat. San Juan county has been settled for 10,000 years.	The statement on pg. 2-5 is a simple statement directed to the general public that the BLM attempts to develop management prescriptions on a landscape level which will support and protect wildlife habitats while allowing for multiple use. Presettlement habitat of sage grouse is defined on pg. 34

				of the Gunnison Sage Grouse Range Wide Conservation Plan. The term presettlement in this document refers to the early 19th century.
San Juan County	121	41	Page 2-50: BLM says it will "work in coordination with UDWR to reduce wildlife numbers as necessary to restore sagebrush habitat." BLM does not do this. The factor most responsible for the decline of sagebrush is browsing by mule deer, not drought.	UDWR is the agency with jurisdictional authority for wildlife population numbers. The DRMP/EIS states that BLM will work with UDWR to achieve the UDWR goals.
San Juan County	121	42	Page 3-168. The species name for elk is cervus elaphus, not cervus canadenisis.	UDWR lists elk as cervus canadenisis and this nomenclature was adopted by the BLM in the DRMP/EIS.
San Juan County	121	43	Page 3-169 - 171. Mule deer do not eat dry and dead grass during the winter. Predation, not drought, is the reason for reduced mule deer numbers. ATV's, oil and gas development, mining, livestock grazing do not have the impact that predators have had on mule deer populations. Predation must be discussed in the Draft RMP/EIS.	The BLM stands by the statement on pg. 3-169 that mule deer will eat dead grass during the winter. Predation, although not within the BLM's jurisdiction, can also contribute to mule deer population declines. This has been added to chapter 3 of the PRMP/FEIS.
San Juan County	121	44	Page 3-171. BLM states that 90% of the local deer and elk population is located on BLM during an average of five winters out of ten. These data must be produced. On p. 3-172, DWR herd objectives and population estimates for elk are listed. These are imaginary numbers. DWR's elk population estimates are consistently 30-40% low because the agency ignores scientific studies. BLM should acknowledge the error of DWR's estimates.	The BLM has relied on information provided by the UDWR for elk and deer populations and habitat in the DRMP/EIS. UDWR is the agency with juridictional authority on these matters.
San Juan County	121	45	Page 3-173. BLM states that "livestock competition for forage is increasing as the elk herd numbers continue to grow." Forage was allocated to livestock when the allotments were adjudicated; thus, the problem is the increasing elk herd.	The BLM has reworded the sentence on pg. 3-173 to state that forage competition between livestock, other wildlife, and elk is increasing in the Cisco desert.
San Juan County	121	46	Page 3-173. Elk use in Hatch Point is zero, in Lisbon Valley and on most of Black Ridge it is near zero. The agency has no data to support its assertions.	Deer and elk habitats were combined for mapping purposes. As stated in response to comment 121-38, these habitats have been delineated separately on a map.
San Juan County	121	47	Table 3.58. BLM's age objectives for antelope make no sense. Antelope do not normally live to 14, and an age	This information was provided by the UDWR which is the agency with jurisdictional authority.

			objective of 2 means the herd is under extreme harvest pressure, which is not the case.	
San Juan County	121	48	What evidence is there that desert bighorns actually use the Redd Sheep Trail?	Pellets from bighorn have been gathered from the Redd Sheep Trail; tracks have also been seen on it, as well as extensively along the rims accessed by this trail.
San Juan County	121	49	Mule deer, elk and pronghorn do not utilize pinyon-juniper habitat, as is asserted in the DEIS. There is no need to protect pinyon or juniper; there is the need to clear them to restore natural conditions. Maintenance of chainings must specifically be addressed in the RMP.	See response to comment 121-34. Pronghorn use has been noted in areas where pinyon-juniper interfaces with shrub-steppe/grasslands. These pinyon-juniper areas are utilized for thermal protection. The DRMP/EIS (pg. 2-14) recognizes the need for maintaing vegetation treatments to increase the availabilty of forage. Many of these treatments involved the removal of pinyon-juniper.
San Juan County	121	50	Page 4-449. Cattle do not eat sagebrush; cattle grazing at the proper time of year can improve sagebrush habitat for mule deer. Livestock do not compete for escape terrain or thermal cover with deer and elk.	Although cattle prefer grass, they will eat sagebrush when necessary. For example, during severe winters cattle may not be able to access grass and as a result they are forced to eat sage brush. During summer months cattle will seek the shade along the edge of pinyon-juniper interfaces with sagebrush/grassland. These are areas that deer typically occupy for thermal protection and escape terrain.
San Juan County	121	51	Page 4-452. BLM mentions that elk are intolerant of cattle, which is true, but the BLM fails to mention that mule deer are intolerant of elk. The DEIS needs to discuss elk-deer competition. BLM needs to discuss the negative impact deer browsing has on sagebrush.	UDWR is the agency with jurisdictional authority for big game populations. Elk and deer competition must be addressed by UDWR population objectives. Sagebrush communities across the west have been in decline from a myriad of reasons. The BLM Sagebrush Conservation Gidance is prescribed as management common to all action alternatives on pg. 2-50 of the DRMP/EIS. UDWR has not identified overpopulation issues among local deer herds utilizing sagebrush communities.
San Juan County	121	52	Pages 4-483 and 4-484. Sections 4.3.19.18.2.1 and 4.3.19.18.2.2 erroneously assess the impact of habitat fragmentation on mule deer and elk. BLM's analyses	The fragmentation analyses in the referenced sections are not an attempt to quantify specific impacts from site specific projects but are presented to analyze the degree

			are flawed and should be corrected or removed. Sawyer's 2006 study is not applicable to San Juan County. DWR's study plots are near roads and DWR would not locate its plots close to roads if mule deer and elk use was reduced near roads as claimed by BLM.	of habitat fragmentation under each alternative. GIS models were based on the BLM's best available data. These models address fragmentation differences between alternatives on a landscape level. Habitat fragmentation is one of many factors that play an important role in land management decisions.
San Juan County	121	53	Pages 4-484 ti 4-485. BLM's analysis of bighorn sheep fragmentation is flawed (p. 4-484- 4-485). BLM fails to mention that hikers disturb sheep more than do vehicles. Predation should also be mentioned, as should the dense growth of non-native woody riparian vegetation found along the Colorado River.	As stated in response to comment 121-52, the analysis of habitat fragmentation for bighorn sheep is a tool to understande the differences in fragmentation among alternatives. See response to comment 121-37 for a discussion of hikers on bighorn sheep. Predation is under the jurisdiction of UDWR. Tamarisk encroachment along the Colorado River was not raised as an issue in the Draft RMP/EIS. However, the BLM recognizes the need for bighorn watering catchments, and has an active program of wildlife watering projects.
San Juan County	121	54	Page G-25 (last paragraph). What reduces the survival rate of fawns and calves is predation.	BLM does not manage predation efforts; UDWR is the agency with jurisdicational authority over predation.
San Juan County	121	55	Page N-5. BLM's 1989 RMP amendment gave 1,440 as the "prior stable number" of desert bighorn sheep. On p. 3-176, it states that the DWR's population objective for the Moab area is 450 desert bighorn sheep. Why are these numbers different?	The number of 1,440 was used in the 1989 RMP amendment. The number 450 is an updated number utilzed in the DRMP/EIS (2007). The difference is a refliction of the number of years between the two documents (18 years).
San Juan County	121	56	Bald Eagles are not on the Federal Endangered Species List. The animal was removed last June.	The delisting of the Bald Eagle had not occurred prior to the printing of the DRMP/EIS. This change has been made to the PRMP/FEIS.
San Juan County	121	57	BLM has not coordinated with local Native American governments regarding wilderness planning, as is required in Section 202 of FLPMA. Anything less than the opportunity for full participation will be considered a violation of law subject to legal action.	During the development of the DRMP, the BLM invited the affected tribal governments to fully participate in the RMP process, to consult on any aspect of the RMP's management prescriptions or actions, and to provide comments or issues of tribal concern. As outlined in Chapter 5 of the Moab DRMP/EIS, the BLM held several

				meetings with tribal governments concerning the development of the RMP, including holding additional meeting after the DRMP/EIS alternatives were prepared, as requested by the tribal governments. All consulted tribes were provided copies of the alternatives and draft documents. For example, the BLM held several meetings with the Navajo Nation. The BLM met with the Navajo Utah Commission on February 11, 2004, and with the Navajo Nation Historic Preservation Office on December 9, 2003, and on November 13, 2006. The BLM also met with the Southern Ute Tribe on March 30, 2004, and on October 11, 2006; meetings with the Ute Mountain Ute Tribe were held on August 26, 2004, and on February 9, 2007. A summary of tribal consultation, including all meetings with tribal governments and issues raised is contained in Chapter 5 of the DRMP/EIS. A complete record of the consultations is available in the Administrative Record for the DRMP/EIS.
San Juan County	121	58	For lands in question in the wilderness re-inventory, BLM has not adequately considered historical uses of the land, present and potential future uses of the land. Several court cases show that the wilderness planning process fails to adequately address several issues. Wilderness is a land classification and not a management modality. Wilderness is not within the scope of multiple use management. BLM is a rogue agency because it has a single-minded, headlong thrust to declare additional wilderness study areas within San Juan County. BLM has openly and brazenly defied the will of congress and the will of the people. BLM must coordinate with local plans, such as that of San Juan County	No lands are proposed to be managed as Wilderness or WSA in any alternative of the DRMP/EIS. However, the impacts of protecting Non-WSA lands with wilderness characteristics is fully disclosed in Chapter 4 of the DRMP/EIS. The FLPMA makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103© (43 U.S.C. §1702©).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations.

San Juan County	121	59	BLM has refused to issue oil and gas leases because of the introduction of H.R. 1500, "America' Red Rock Wilderness"	Certain oil and gas parcels were deferred from leasing pending completion of the Moab RMP because of dated NEPA analysis. The BLM does not manage public land based on pending draft or proposed legislation.
San Juan County	121	60	BLM must have public hearings, adequate notice and opportunity to comment upon, and participate in the formulation of plans and programs. There have only been two meetings to give the public an opportunity for clarification, and it was unclear whether the meetings held were "open houses" or "public hearings".	Public participation opportunities are detailed in Chapter 5 of the DRMP/EIS. To satisfy the public participation requirements of FLPMA, the BLM initiated the public scoping process on June 4, 2003 and the scoping period extended until January 31, 2004. Six open houses and a comment cruiser were utilized to gather public input as well as a website with provisions for emailing comments and an invitation to provide written comments via letters. A mailing list has been established of interested parties and a planning website has been maintained throughout the process. The public was invited to review and comment on the DRMP/EIS from August 27, 2007 to November 30, 2007. Four open houses were held to solicit comments from the public on the DRMP/EIS. The public was notified about the open houses through newspaper advertisements and articles, radio announcements, the RMP website, and postcards mailed to everyone on the mailing list. The open house format was utilized because it is more conducive to full public participation.
San Juan County	121	61	BLM must make a clear statement of whether it intends to designate WSAs for those areas that have wilderness character.	The BLM is not authorized to designate “Non-WSA Lands with Wilderness Characteristics” as WSAs or manage these lands under the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). The BLM authority to establish new WSAs pursuant to Section 603 of FLPMA expired no later than October 21, 1993, therefore as stated on pg. 1-12 of the Moab DRMP/EIS designation of new wilderness areas or WSA proposals are decisions outside of the scope of the DRMP/EIS.
San Juan County	121	62	BLM should have a more generous road set-back. The BLM "standard" is indefensible. It provides no reasonable or rational opportunity for maintenance of roads. The BLM's boundaries are at man made	The road set-back described by San Juan County only applies to roads within or adjacent to WSAs. The WSA setback is established by National BLM policy and is beyond the scope of the plan.

			barriers, which has resulted in capturing large chunks of State Trust land as well as some parcels of private land. This violates the County Comprehensive Plan which calls for no net loss of private land within the county.	Routes adjacent to or within Non-WSA lands with wilderness characteristics have been accorded setbacks varying according to the classification of the road. These setbacks range from 3 to 91 meters. The acreage of Non-WSA areas with wilderness characteristics has been reduced to realize these setbacks. Information has been added to Chapter 3 of the PRMP/FEIS to clarify these setbacks. The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled. The FLPMA requires that BLM's land use plans be consistent with State and local plans “to the extent practical" where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved. The BLM will identify these conflicts in the FEIS/PRMP so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options.
San Juan County	121	63	San Juan County objects to the 1996-99 Wilderness Character Reinventory process. FLPMA does not provide for wilderness as a multiple use.	The BLM is required by FLPMA to maintain inventories of all resources and to use the inventory information during land use planning (FLPMA Section 201 and 202 (43 U.S.C. §1711-1712)). The FLPMA makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .”(FLPMA, Secton 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a

				mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. See also responses to comments 120-8 and 121-10.
San Juan County	121	64	BLM did not make information public regarding the impact of additional WSA designations.	The DRMP/EIS proposes no lands for additional WSA designation. The document identifies non-WSA lands that are proposed to be managed to maintain their wilderness characteristics. There are 26,162 acres of such lands within San Juan County in Alt B, and none in the Preferred Alternative, Alt C. All of the information that was utilized in making these determinations is publicly available, and any information which is not on the Moab RMP website will be provided to any interested party.
San Juan County	121	65	BLM must consider all grazing files, mineral files, lands cases, recreation use permits etc. in terms of the suitability of the land to be managed for wilderness designation.	Considering lands for WSA or wilderness designation is beyond the scope of BLM's land use planning effort, as identified on pg. 1-2 of the DRMP/DEIS. Chapter 4 of the DRMP/DEIS analyzes the impacts from management prescriptions which protect Non-WSA lands with wilderness characteristics, and the impacts on other resources and uses because of that protection. In addition, during the inventory process, the majority of the existing land uses were identified and taken into consideration when determining areas with wilderness characteristics. The source of the information was documented unit-by-unit during the wilderness review. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the units, was part of the review process. This inventory is available on the Moab RMP website, and is part of the Administrative Record. The information is also available upon request. Those non-WSA lands that are considered for management of wilderness characteristics in Alternative B

				were analyzed for their suitability for other uses. These uses were the reasons why there are no non-WSA lands within the county that are managed for wilderness characteristics in the Preferred Alternative. Those Non-WSA lands that are considered to be managed to maintain the wilderness characteristics in Alternative B were also analyzed for their suitability for other uses. See also response to comment 121-63.
San Juan County	121	66	BLM must consider access, economic analyses, Native American issues and alternatives for management in terms of manageability for wilderness.	No lands are considered for wilderness designation. Those non-WSA lands that are considered for management for wilderness characteristics in Alternative B were analyzed for access, economic uses, alternatives for management, and Native American concerns. These were among the reasons why there are no non-WSA lands within the San Juan County that are managed for wilderness characteristics in the Preferred Alternative (Alt C).
San Juan County	121	67	The mineral evaluations associated with the wilderness re-inventory are inadequate. The values of the foregone minerals must be calculated in areas under study for possible WSA designation. BLM violates its national minerals policy. BLM has failed to issue oil and gas leases because of planning. USGS is not involved in the wilderness process.	Considering lands for WSA or wilderness designation is beyond the scope of BLM's land use planning effort, as identified on pg. 1-2 of the DRMP/EIS. A comprehensive Mineral Report was prepared for the entire Moab planning area. This report was prepared by the Utah Geological Survey, in cooperation with the BLM. The report includes a comprehensive evaluation of the mineral potential of all mineral resources in the area. It also included an assessment of the development potential of all mineral resources in the area. In addition, a Reasonably Foreseeable Development scenario for oil and gas resources was prepared in cooperation with the Utah Geological Survey. The scenario provides projections of the potential oil and gas development in the entire area over the next 15 years.

				The mineral evaluations included all the Non-WSA lands found to have wilderness characteristics and were conducted in conformance with the BLM national minerals policy. The EPCA inventory of oil and gas resources prepared by the USGS was used in drafting the Mineral Report. Impacts to the affected mineral resources were analyzed and disclosed in Chapter 4 of the DRMP/EIS.
San Juan County	121	68	The BLM should examine and discuss the potential economic losses to those areas associated with potential wilderness or WSA designation. It should also put forth alternatives where these adverse economic affects can be mitigated, such as larger PILT payments.	Considering lands for WSA or wilderness designation is beyond the scope of BLM's land use planning effort, as identified on pg. 1-12 of the DRMP/DEIS. Those Non-WSA lands that are considered for management of wilderness characteristics were analyzed for the economic effects of that action. For example, on pg. 4-94 of the DRMP/DEIS, the number of oil and gas wells foregone in Alternative B is discussed. The PILT payments are outside the scope of the land use planning process.
San Juan County	121	69	San Juan County objects to using "cherry stemming" to create wilderness where none exists under the law. If BLM recognizes a road as a boundary, what is the setback?	Considering lands for WSA or wilderness designation is beyond the scope of BLM's land use planning effort, as identified on pg. 1-2 of the DRMP/DEIS. "Cherry stemming" is a land management technique that facilitates better land management by allowing ingress and egress without compromising a special designation. This technique is often applied to WSAs. However, the BLM is not proposing any WSAs under any alternative in the Moab DRMP/DEIS. Furthermore, no lands are proposed for management of wilderness characteristics in San Juan County for Alternative C of the DRMP/DEIS. Road setbacks are addressed in response to comment 121-62.
San Juan County	121	70	FLPMA requires a consistency review with local plans. The San Juan County Comprehensive Plan must be	The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land

			considered. Any diversions from the objectives of this plan by BLM must be accompanied by an explanation of why the BLM could not lawfully conform to the county plan.	management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled. Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the PRMP/FEIS, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5. No lands are considered for wilderness designation in the DRMP/EIS. Also, no non-WSA areas with wilderness characteristics are proposed for management in Alt C.
San Juan County	121	71	Solitude is a subjective concept. Area ranchers would express the view that recreationists have a negative influence on solitude. What does "outstanding" opportunities for solitude mean? What constitutes primitive or unconfined recreation. What is more important -- the economic viability of a county or solitude for an elite few?	Congress crafted the terms "outstanding opportunities for solitude" and "primitive or unconfined recreation" when it enacted the Wilderness Act of 1964. The BLM Washington Office Instruction Memorandum 2003-275 Change 1 defines these terms for the purposes of land use planning. In general, when the sights, sounds, and evidence of other people are rare or infrequent, where visitors can be isolated, alone or secluded from others, where the use of the area is through non-motorized, non-mechanical means, and where no or minimal developed

				recreation facilities are encountered can provide visitors with the opportunity for solitude or primitive or unconfined recreation. The economic impacts of managing non-WSA lands with wilderness characteristics were analyzed in Chapter 4 of the DRMP/EIS.
San Juan County	121	72	Comment Analysis on the 1999 Wilderness Inventory found that those supporting wilderness were from out of state. Those supporting wilderness that were from Utah were from Salt Lake, Ogden and Logan. San Juan County residents were clearly opposed to any action by BLM to designate more land for WSAs. Native American comment letters were opposed to wilderness designation. Local comments are more impassioned, knowledgeable and we believe warrant more weight being placed on them. Unit specific comments follow. The 1999 inventory was not really field truthed and there is a lack of consistency between field personnel. In this (1999) inventory, the BLM has developed their own set of rules and definitions as to what constitutes wildereness. BLM has not followed the direction of Congress in defining wilderness.	1Considering lands for WSA or wilderness designation is beyond the scope of BLM's land use planning effort, as identified on pg. 1-2 of the DRMP/DEIS. Under FLMPA, multiple use is defined as the management of public lands and their various resource values so they are used the combination that will best meet the present and future needs of all the American people. As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process (findings from this review are available on the Moab Field Office planning website, and in the Administrative Record). The BLM is confident of high-standard approach used to inventory the public lands and stands by its findings, particularly the findings which involved wilderness characteristics inventory maintenance.
San Juan County	121	73	Comment from 1999 Wilderness Inventory: Behind the Rocks: this area should not be considered for further wilderness activities. It is within the Paradox Fold and Fault Belt and has high potential for oil and gas. It has the potential for uranium and vanadium, as well as	No lands are considered for wilderness designation in the DRMP/EIS. No non-WSA lands with wilderness characteristics are proposed for management in Alternative C (Preferred) of

			potash and copper. It does not qualify for wilderness because of past impacts. There are 13 roads within the unit, each of which is discussed specifically, with photos provided.	the DRMP/EIS in the Behind the Rocks area.
San Juan County	121	74	Comment from 1999 Wilderness Inventory: Gooseneck: San Juan County has no information that would refute BLM's finding in this area. It contains about 5,000 acres of public land, and to our knowledge has few intrusions. It should be pointed out, however, that this area does have the potential for minerals including potash, uranium and oil and gas. The economic potential of these minerals should be done if the area is designated wilderness. The minerals values outweigh the wilderness values. The BLM did miss four roads within or adjacent to the unit (photos and write-ups provided).	No lands are considered for wilderness designation in the DRMP/EIS. No non-WSA lands with wilderness characteristics are proposed for management in Alternative C (Preferred) of the DRMP/EIS in the Gooseneck area.
San Juan County	121	75	Comment from 1999 Wilderness Inventory: Hatch Wash: this unit is particularly disturbing to San Jan County. BLM is creating wilderness where wilderness does not exist. There are roads, seismograph lines, fences and other intrusions covering the landscape. The Hatch Wash area has high potential for oil and gas, uranium, vanadium, copper and potash. San Juan County requests that the area be dropped from further wilderness consideration. Specific roads in the area are identified by San Juan County.	No lands are considered for wilderness designation in the DRMP/EIS. No non-WSA lands with wilderness characteristics are proposed for management in Alternative C (Preferred) of the DRMP/EIS in the Hatch Wash area.
San Juan County	121	76	Comment from 1999 Wilderness Inventory: Hunter Canyon: Mineral values will be foregone if wilderness is designated for this area. It has oil and gas, uranium, vanadium, copper, barite and potash. Specific roads are discussed within the comment.	No lands are considered for wilderness designation in the DRMP/EIS. No non-WSA lands with wilderness characteristics are proposed for management in Alternative C (Preferred) of the DRMP/EIS in the Hunter Canyon area.
San Juan County	121	77	Comment from 1999 Wilderness Inventory: Shafer Canyon: This unit is not suitable or managable as wilderness, and it violates the 5,000 acre requirement. It has oil and gas, uranium, vanadium, copper and potash resources. Individual roads are also discussed.	No lands are considered for wilderness designation in the DRMP/EIS. No non-WSA lands with wilderness characteristics are proposed for management in Alternative C (Preferred) of

			San Juan County suggests that it could easily be managed as an area of critical environmental concern to protect the scenic qualities and vistas from Dead Horse Point.	the DRMP/EIS in the Shafer Canyon area. The area does constitute a portion of the Highway 279/Long Canyon/Shafer Basin ACEC that is proposed in Alt C (Preferred) to protect scenic resources, particularly the vista from Dead Horse Point State Park.
Colorado Division of Wildlife	218	1	Closing many of the spur roads that have no destination will also be of great benefit to wildlife. There is one road that is identified to be closed under preferred alternative C in the travel management plan that concerns us, as we would like to have this road remain open. In the Dolores River Triangle there is a road starting in Township 21S Range 26E Section 32 SW 1/4 (state school section) that heads south for approximately one mile before it braches; both branches head southeast up different forks of spring Canyon along Spring Creek before entering into Colorado. This road provides the only public access into BLM land on the Colorado side of the border. Closing this road to motorized use will have large impacts on hunger opportunity and harvest in Colorado's Game Management Unit 40. Our elk herd in GMU 40 is currently well over it's population objective and helping hunters achieve success is of great importance to us. Due to the large amount of private ground on the Colorado side and the difficulty in getting hunters onto private ground, public opportunity in this unit is limited. The Spring Creek area is a popular spot for GMU 40 hunters to go, particularly in the later rifle seasons. It is one of the most consistent locations in GMU 40 for hunters restricted to public land to harvest cow elk during this time period. If this road is closed to motor vehicle access, it would greatly decrease hunter opportunity and success in this area, potentially leading to even higher elk population numbers in the unit. A large number of the elk in this unit winter across the	As this route provides the only public access to public lands in Colorado, it has been added to the preferred alternative. The route has been designated in Alternatives C and D.

			boarder in Utah and left unchecked will have significant impacts to habitat on both sides of the border	
Green River City	263	1	Request that BLM ensure there are no conflicts between developable mineral deposits and areas being proposed (or currently managed) as having strict restrictions on surface disturbance. The Energy Policy Act of 2005 and other legislation sought to identify and mitigate circumstances that limit domestic energy production that is important to our nation's energy independence.	In accordance with the Energy Policy Conservation Act, the least restrictive stipulations were applied to protect important natural resources. See response to comments 203-46 and 210-2. See response to comment 121-15 regarding other restrictions.
Green River City	263	2	Under Chapter 3 of the DEIS, (socio conditions/context) Green River encourages, without significantly delaying the final RMP, the addition of a section highlighting the context and overlap of Energy Development in Grand County and its importance to the economy of Green River. Many truckers, contractors, and vendors do or will utilize services in Green River and these numbers need to be measured and included in your analysis. The contributions to our community from these taking place in Grand County lands adjacent to our municipal borders need to be described in your final document as our town will likely comment on future projects that affect our community. In recent years, Grand County relinquished its portion of Green River to Emery County, making Green River City an anomaly of sorts and as such, Green River encourages the BLM to identify what exploratory and long-term mineral production benefits will occur in Green River as the closest municipality to exploratory development north and south of I-70 within the Moab planning area. Such an addition would enhance the quality of the NEPA analysis by acknowledging the role Green River plays in servicing the mineral operations that occur in the Moab BLM field office planning area. Green River asks that this item be addressed in the final EIS and ROD.	As described in Chapter 4, the BLM does not expect to see significant oil and gas development in the Moab planning area over the life of the plan, and therefore does not expect major socioeconomic benefits or costs from these activities. However, acknowledgement of the potential economic benefits to the surrounding communities of Green River and Grand Junction has been added to the document. The BLM summarizes the minor costs and benefits associated with oil and gas development on local communities in Chapter 4, p. 260-264. The impacts such activities have had in other parts of the West is unlikely to apply to the MPA.
US Geological Survey	410	1	Section 3.8.1.2.1, Resource Overview, page 3-49	Our assessment is specific to coalbed methane contained in the Sego coal field. The Uintah-Piceance

			The USGS has updated its assessment of coalbed methane resources of the Nation and results are reported in the following documents. For the Uinta-Piceance Province, the most recent (2002) USGS estimate of technically recoverable coalbed methane is 2.3 trillion cubic feet of gas (TCFG). Assessment of Undiscovered Oil and Gas Resources of the Unita-Piceance Province of Colorado and Utah, 2002, USGS Fact Sheet FS-026-02, http://pubs.usgs.gov/fs/fs-0026-02-fe-0026-26.pdf National Oil and Gas Assessment, 2007 Update (PDF map showing mean coalbed methane resources for Uintah Piceance and other provinces) http://certmapper.cr.usgs.gov/data/noga00/natl/graphic/2007/mean_gas_CBM_07.pdf	province lies to the north and east of the Moab field office.
US Geological Survey	410	2	Section 3.16, Special Status Species (pages 3-140 to 3-157); Section 4.3.15, Special Status Species (pages 4-353 to 4-404); and Section 4.3.19, Wildlife and Fisheries (pages 4-442 to 4-486) There are several special status species (threatened, endangered, and candidate species) identified in the DEIS that have been found in the study area in the past 10 years. The document includes an impacts summary table for special status species and for wildlife and fisheries resources (Table 2.2, pages 2-94 – 2-97 and pages 2-101 – 2-105, respectively). However, a summary analysis of proposed mitigation measures with respect to these species for the various proposed alternatives is not provided. It would benefit the public if the final EIS included a summary analysis of proposed mitigation measures based on available scientific studies with supporting references.	Appendix C of the DRMP/EIS details the stipulations applicable to special status species for oil and gas leasing and other surface disturbing activities. The U.S. Fish and Wildlife Service will issue a Biological Opinion on the impacts to canditate and listed threatened and endangered species.
Ute Mountain	430	1	Upon review of your draft it seems some of the Utah	On page 2-56 of the DRMP/EIS, under management

Ute Tribe			Mountain Ute Tribe's important cultural issues have not been addressed. The women of White Mesa Ute Community, located south of Blanding, Utah, have traditionally made baskets from squawbush. One of the most critical areas where they gather this plant is off Highway 128, adjacent to the Arches National Park boundary and the river. These baskets play an important role in the culture and traditions of the White Mesa Community. The Tribe would therefore formally request that gathering of squawbush be allowed to continue in this area, and that it be made clear that the proposed restrictions in this area do not apply to gathering of plans for both medicinal and traditional practices such as basket making. Allowing these traditional gathering practices to continue would result in minor environmental impacts, while simultaneously allowing the White Mesa community to practice and preserve their cultural heritage. When spring comes the Cultural Resource staff from the tribe and the tribal elders have agreed to meet with any of the Moab BLM staff to show them culturally significant gathering areas. If there is further information the Tribe can provide, or to arrange a meeting with the staff and elders, please contact Cultural Resources Coordinator, Terry Knight at (970) 759-6790 or Lynn Hartman at (970) 564-5600.	common to all alternatives, it states: "Permit sustainable harvest (including cutting of green willows and cottonwoods) for Native American traditional ceremonial use". Squawbush has been added to this list of plants to specifically accommodate the Utah Mountain Ute Tribe's request.
BLM - Grand Junction Field Office	473	1	McInnnis Canyon NCA supports the need for an adequate takeout for users of the Ruby -Horsethief section of the river. Any permit system that would affect these users will need to be developed cooperatively with the NCA and incorporate resources and public use concerns for this entire section of the river, including	The Moab BLM welcomes the opportunity to work with McInnis Canyon NCA regarding takeouts for Ruby users.

			the portion in Colorado. Follow-up discussions needed with the NCA staff.	
BLM - Grand Junction Field Office	473	2	Utah Rims SRMA (adjacent to Rabbit Valley): The Alt C direction and management actions are overall consistent with management in the Rabbit Valley portion of the NCA. MFO and MCA staff should meet to discuss all designated roads and trails that cross the state line to ensure consistency on route designations and provide loop opportunities for recreationists.	A meeting between NCA and Moab BLM staff has already occurred to ensure consistency on route designations.
BLM - Grand Junction Field Office	473	3	re: designated routes map: The MFO draft plan does not show a designated route on a road that comes from the south end of Rabbit Valley out of the NCA and to the railroad tracks at May Flat, Thisis a designated route in CO and a popula roadused by recreationsits to access the May Flat area.	This route was not designated because it leads primarily to state and private land and because of a cultural conflict on a large sand hill right next to the route. The route will remain non-designated in the Moab RMP.
BLM - Grand Junction Field Office	473	4	re: designated routes map: There is a road from May Flats that goes upriver in the floodplain and accesses a private parcel in CO. A 1/2 mile portion of this road is shown on the MFO draft map as a designated route, without a connection to any other designated routes.	This piece of road is in error -- it was to be removed along with the rest of the May Flat loop.
BLM - Grand Junction Field Office	473	5	re: designated routes map: The MFO draft map shows a designated route starting at the State line near the Little Dolores River, crossing private and State of Utah land, following the Black Ridge Canyon Wilderness boundary, and ending at the CO river., approx 2 miles downstream from the Westwater Ranger station. The CO pportion of this road does not have legal public access in Colorado. It should not show on the MFO map as a route open for public use.	This route was designated in error. It has been removed from the designated route map.
BLM - Grand Junction Field Office	473	6	NCA staff should meet and discuss all road and trail linkages that cross the state line.	This meeting has already occurred.
BLM - Grand Junction Field Office	473	7	Alt C shows that most of the land on the Utah-Co border currently open to OHV travel would be limited to designated routes, The GJFO has completed an extensive inventory of routes near the UT-CO border. The routes on which potential conflicts exist are in the	The requested meeting has occurred and the routes in question were discussed.

			area N of I-70 along bitter creek and near coates creek. Our staff has identified a few routes that would be closed under Alt C that are known to be well-used by visitors crossing the UT-CO border. Our Rec staff is having difficulty interpreting some of the maps in the EIS and cannot be certain of the extent of these conflicts. It is not clear, for example, why some motorized routes (single-track trails) that cross the border north of I-70 do not appear on the MFO inventory nor is it clear what would happen to them under Alt C. GJFO must assume that they would be closed, since they are not shown on may 2-11E designated motorcycle routes. We request a meeting between the MFO and GJFO to clarify and resolve these questions.	
BLM - Grand Junction Field Office	473	8	Alt. C for the Dolores River SRMA on the Dolores River , from the CO border to Bridge Canyon specifies a permit requirement for both private and commercial use and it limits commercial outfitters to 14. The GJFO has outfitters using the Dolores River, some shared with the MFO, that will be required to take out at the state line if they are not one of the 14 outfitters. Private boaters using the Dolores River in CO are not currently required to have a permit and would also have to take out at the state line. This may significantly affect recreation opportunities available on the Dolores river for private boaters, given the limited and unpredictable flows of the river, it seems unnecessary to restrict use. How would private permits be administered? And, why only permit half of MFO's portion of the Dolores? In any case, this issue could influence management options fro the Gateway SRMA and would be a good topic of discussion between the MFO and GJFO.	Permits are required of all users on the dolores River in Utah. This is not a new planning decision -- it has been the case since the 1970's. The Moab BLM urges the Grand Junction office to consider a permit process for its portion of the Dolores river. Commercial boating permits on the Dolores River are on an allocated system.
Environmental Protection Agency	479	1	The BLM (in Table 4-8 of the DRMP/EIS) indicates that projected concentrations (of air pollutants) would be below National Ambient Air Quality Standards for criteria pollutants and hydrogen sulfide, but does not	The methods used to calculate the projected concentrations of pollutants and hydrogen sulfide are included in the PRMP/FEIS.

			show the concentrations. The DRMP/EIS does not describe the methods used to calculate the projected concentrations. EPA recommends that the BLM disclose this information in the Final RMP/EIS.	
Environmental Protection Agency	479	2	The air quality analysis omits potential impacts to ozone, visibility or deposition. The planning area encompasses class I National Park Service airsheds. Ozone is of particular concern because of the potential emissions of volatile organic compounds and oxides of nitrogen from oil and gas development.	Analyses of impacts on ozone, visibility, and deposition are included in Chapter 4 of the PRMP/FEIS.
Environmental Protection Agency	479	3	The Final RMP/EIS should include information on the effects of oil and gas development on climate change (from CO2 emission). EPA recommends that the BLM encourage oil and gas lessees to participate in EPA's Natural Gas STAR program.	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This statement has been added to Chapter 3 of the PRMP/FEIS. The Environmental Protection Agency (EPA) has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. A statement to this effect has been added to Chapter 4 of the PRMP/FEIS.
Environmental Protection Agency	479	4	Because a semi-quantitative approach to air quality analysis was taken in the Moab RMP, it is not possible to determine potential impacts to air quality from specific oil and gas development (see Section 4.3.1.3 of the DRMP/EIS). Nevertheless, it is important to assign responsibility for project-specific air quality analyses for the future. EPA recommends that the Final RMP/EIS contain this wording from the Rawlins BLM DRMP/EIS, which also used a comparative, emissions-based	A statement has been added to Chapter 2 of the PRMP/EIS, under Management Common to All, which states the following: "As appropriate, quantitative analysis of potential air quality impacts would be conducted for project specific developments.

			approach: "As project-specific developments are proposed, quantitative air quality analysis would be conducted for project-specific assessments performed pursuant to NEPA."	
Environmental Protection Agency	479	5	The EPA commends the BLM for moving from "open" OHV travel to designated routes. Unrestricted OHV use and unrestricted camping are damaging natural and cultural resources, especially in heavy use areas.	The BLM recognizes that resource damage is occurring due to unrestricted OHV use and unrestricted camping as indicated in Chapter 3, pg. 3-87of the DRMP/EIS. The action alternatives presented in this document are intended to lessen the impacts from these activities.
Environmental Protection Agency	479	6	The EPA supports the open designation in the White Wash Sand Dunes Area in the Final RMP/EIS only if the BLM is able to restore and protect the Dunes' ecological resources and scenic values including the cottonwood trees found in the open dune fields, drinking water sources, stream banks, and bighorn sheep habitat. If these actions cannot take place, EPA suggests that travel in the White Wash area be limited to designated routes.	The BLM contends that Alternative C (Preferred Alternative) in the DRMP/EIS will protect the resources of the Dunes while allowing open OHV use. To achieve this goal, the following management actions are proposed in Alt C: 1) closing by fencing the dune field Cottonwood trees and White Wash water sources and 2) limiting camping to designated sites. In addition motorcycle trails have not been identified for travel in bighorn sheep escape terrain.
Environmental Protection Agency	479	7	Ten Mile Wash is the second largest tributary drainage in the Moab planning area, and is a rich riparian/wetland/cultural/scenic/hydrologic resource. It provides wildlife habitat within a very arid region of the Moab planning area. These resources are considered vulnerable from surface disturbances such as OHV travel. We are concerned that proposing designation of a travel route through the Canyon's unique riparian corridor for OHV travel will substantially increase the likelihood of further significant impacts to these resources, including loss of riparian vegetation and increased erosion, thereby adversely affecting riparian/watershed resource values. The EPA supports the ACEC designation in the preferred alternative, but recommends that no OHV travel route be designated in the Wash in the Final RMP/EIS.	Alternative C (Preferred Alternative) in the DRMP/EIS lists the Ten Mile Wash area as "limited to designated roads and trails" for OHV use. The BLM contends that this designation will protect the unique resource values in this area and still allow OHV travel. On the ground actions to ensure travel on the one route within the wash have included marking, constructing barricades, closing side canyons, and installing educational information. The BLM is committed to continuing these efforts in Ten Mile Wash.
Environmental Protection Agency	479	8	The EPA supports the designation of the 10 proposed SRMAs in the preferred alternative and recommends the management prescriptions proposed for them. The	Enforcement, field presence, monitoring, compliance, education, and signage are all administrative actions and do not require land use planning decisions. These

			EPA recognizes that the BLM has limited law enforcement capability and recommends that the BLM leverage its existing law enforcement resources. Specifically, we recommend that BLM maintain a credible field presence for promoting and monitoring recreation user compliance by hiring seasonal field technicians to educate the public, construct signage, fencing and other barriers, to remediate any new impacts and to report violations to BLM enforcement officers for ticketing.	suggestions will be considered during implementation of the Travel Plan after the land use plan is completed.
Environmental Protection Agency	479	9	The EPA supports the Areas of Critical Environmental Concern (ACEC) proposed in Alt. C.	Comment noted.
Environmental Protection Agency	479	10	The EPA also supports the designation of the following ACEC proposed in Alt B. White Wash Sand Dunes: The EPA supports leaving 1,833 acres of the dunes open to cross country travel, but including the remaining management prescriptions from the ACEC proposed in Alt B. These prescriptions are necessary to protect the valuable resources in the dunes. The BLM should be prepared to close this remaining area of “open” OHV travel if the prescriptions are not successful in restoring and protecting the health of the ecological and cultural resources.	See response to comment 479-6.
Environmental Protection Agency	479	11	The EPA also supports the designation of the following ACEC proposed in Alt B. Labyrinth Canyon: The EPA supports designating this viewshed as VRM I, closing or stipulation no surface occupancy for oil and gas development, and prohibiting new road construction. These management actions would protect visual resources and prevent water quality impacts to the Green River and to its endangered fish species.	In the preferred alternative, this portion of Labyrinth Canyon is managed as no surface occupancy for oil and gas development. It is designated as VRM II. Surface disturbing activities are prohibited (see Appendix C of the DRMP/EIS), which would include new road construction. The BLM contends that the management actions provided in the preferred alternative are sufficient to protect visual resources and to prevent water quality impacts to the Green River and to its endangered fish species. Therefore, the management actions proposed in Alt C (Preferred Alternative) are sufficient to protect the relevant and important values in the area and an ACEC designation is not required.

Environmental Protection Agency	479	12	The EPA also supports the designation of the following ACEC proposed in Alt B. Upper Courthouse: This ACEC contains two rare plants on the state sensitive list, irreplaceable historic resources, relict plant communities, cryptobiotic soils crusts, and significant paleontological deposits of dinosaur bones similar in quality to those found in Dinosaur National Park. The EPA believes that ACEC designation is necessary to fully protect these unique and valuable resources.	In the preferred alternative, the area containing relict plant communities is managed as no surface occupancy. The majority of the remainder of the Upper Courthouse area is also managed as no surface occupancy to protect bighorn sheep crucial habitat. The rare plants, historical resources and paleontological values are protected by law. Therefore, the management actions proposed in Alt C (Preferred Alternative) are sufficient to protect the relevant and important values in the area and an ACEC designation is not required.
Environmental Protection Agency	479	13	The EPA also supports the designation of the following ACEC proposed in Alt B. Colorado River Corridor: This ACEC contains rare and irreplaceable wildlife habitat (for mule deer, desert bighorn, endangered fish, yellow-breasted chats, Lewis woodpeckers, river otter, spotted bat and big free-tailed bat). It is home to rare and endangered plants including Jones cycladenia, Dolores rushpink, cave primrose, alcove bog orchid, alcove rock daisy, endemic alcove columbine and Shultz stickleaf. It has unique visual resources. The EPA believes that the Area should be designated as VRM I and closed or NSO for oil and gas development.	In the preferred alternative (Alt C), the Colorado River Corridor is managed as no surface occupancy or as closed for oil and gas leasing. Surface disturbing activities are prohibited in areas delineated as no surface occupancy (see Appendix C of the DRMP/EIS). In this alternative the area is designated as VRM II. Therefore, the BLM contends that the management actions proposed in Alt C are sufficient to protect visual resources and to prevent harm to wildlife and plant habitat along the Colorado River.
Environmental Protection Agency	479	14	The EPA also supports the designation of the following ACEC proposed in Alt B. Canyon Rims: The scenic views are some of the most spectacular in the western United States and are highly visible to the recreating public. The EPA believes that the area should be designated VRM II, should be NSO for oil and gas development and that no new routes be allowed.	In the preferred alternative (Alt C), this portion of the Canyon Rims is managed as controlled surface use for oil and gas leasing, as it is designated as VRM II. Surface disturbing activities must meet the constraints of VRM II management (see Appendix C of the DRMP/EIS). The BLM contends that the prescriptions provided in Alt C are sufficient to protect visual resources along the rims of the Canyon Rims area.
Environmental Protection Agency	479	15	The EPA supports the management of Beaver Creek, Mary Jane Canyon, and Fisher Towers to protect their wilderness characteristics (WC). The EPA believes that additional WC lands or portions of WC lands need to be managed for wilderness characteristics. These include those areas of WC that are within ACEC designations	All areas determined to have wilderness characteristics are managed to protect these resources in Alt B. The additional areas suggested by the commentor for protection of wilderness characteristics in the preferred alternative (Alt C) are proposed for no surface occupancy because of other resource values. This proposed

			recommended above: Negro Bill Canyon (9 acres), portions of Goldbar (35 acres), Gooseneck (843 acres), portions of Labyrinth Canyon (5,436 acres) and portions of Mill Creek Canyon (2,335 acres)	management would also protect the wilderness values of these areas.
Environmental Protection Agency	479	16	Consistent with EPA's regulatory responsibilities under the Clean Water Act, we consider the protection of the 13,450 acres of riparian/wetlands within the MPA a high priority. Table 3.22 of the DRMP/EIS indicates that only 57% of these areas are in proper functioning condition (PFC). The EPA believes that the 100 meter riparian buffer zone, while affording some degree of protection, is not sufficient. The EPA believes that the ¼ mile buffer zone created when a river is found suitable for Wild and Scenic River status should be considered for all wetlands 1) not in PFC, 2) vulnerable to impacts from oil and gas production, recreation and grazing, and 3) along stream segments with steeper slopes. The EPA supports all the stream segments found suitable for Wild and Scenic River Status in Alt C. The EPA believes that the following additional eligible segments be found suitable for Wild and Scenic River designation in the preferred alternative: Onion Creek, Mill Creek, Thompson Wash, Negro Bill Canyon, Beaver Creek, Professor Creek, Rattlesnake Canyon, Thompson Canyon and all segments of the Green River.	The 100 meter buffer zone for riparian areas is based on BLM policy found in Utah State Office Instruction Memorandum 2005-091. The EPA provides no rational as to why they believe a for why a 1/4 mile buffer is necessary. All of the stream segments suggested by the commentor for suitability as Wild and Scenic River status are included in Alt B. In Alt C, these river segments are recommended for management as no surface occupancy or closed to protect other resource values. This proposed management would protect the riparian areas along these stream segments. Following procedures, it is a suitability decision for the BLM to make. It is a management decision. Every one of these NSO or closed.
Environmental Protection Agency	479	17	The EPA recommends the grazing decisions proposed in Alt B to reduce soil compaction and erosion. These actions would protect and restore to PFC up to 4,442 acres of riparian/wetlands along 58 miles of perennial streams.	These grazing actions are site specific and can be implemented under the Standards for Rangeland Health and Guidelines for Livestock Grazing Management under all alternatives in the DRMP/EIS.
Environmental Protection Agency	479	18	The EPA is concerned that the Greater Cisco and Bookcliffs RFD areas have large acreages of sensitive soils and would be impacted by oil and gas development. The EPA recommends that development in these areas be limited to the 149 wells proposed under Alt. B. This represents approximately 50% less surface disturbance than proposed under any of the	Under alternatives B and C in the DRMP/EIS sensitive soils are protected with timing limitation stipulations (see Appendix C). The BLM analyzed the impacts to soils from oil and gas development under the various alternatives. Alt C balances commodity production with resource protection.

			other alternatives. This would lessen the impacts of development to biological soil crusts, reduce erosion and sedimentation/salinization of surface waters, improve visibility, reduce the loss of soil productivity and reduce the invasion of noxious weeds.	
Environmental Protection Agency	479	19	On pg. 4-17 of the DRMP/EIS, the BLM discusses rates of emissions from compressor engines in grams per horsepower-hour. Table 4.6 shows emission rates in grams per second, but the text does not explain whether BLM made this calculation in order to estimate impacts using the semi-quantitative method or for some other reason. An explanation is needed in the Final RMP/EIS as to why different units appear in this section, or convert emission rates to the same units.	The text and tables in Chapter 4 of the PRMP/EIS have been modified to provide an explanation regarding the units of analyses.
Environmental Protection Agency	479	20	In the Final RMP/EIS, the BLM should address the potential for wind events and the contribution of erosion-prone soils to them. The Final RMP/EIS should also address the BLM's plans to mitigate the impact of wind events.	The potential for wind events is addressed on pg. 3-4 and pg. 3-9 of the DRMP/EIS. Management actions proposed under the preferred alternative that would reduce wind blown dust include 1) eliminating cross country travel by limiting OHV use to identified routes and 2) timing restrictions on surface disturbing activities in sensitive soils.
Environmental Protection Agency	479	21	The BLM should provide more specific information on the role of increased OHV use in potential air quality impacts and whether/how the BLM's decision to move to a designated recreational trail system may affect this. The BLM should present details of its estimates of increases in OHV use (e.g. in vehicle-miles traveled or similar measure).	On pg. 4-26 of the DRMP/EIS it identifies a moderate benefit to air quality by restrictions to cross country travel. The effects of OHV use on air quality is discussed on pg. 3-9 of the DRMP/EIS. On pg. 3-157 the increase in OHV use is recognized. Specific quantifiable details on the impacts of OHV use are not available. Land use planning level decisions involve broad resource allocations and qualitative analysis is often all that is available. Further site specific analysis on the impacts to the resources specified by the commentor will be conducted on the project level.
Environmental Protection Agency	479	22	More site-specific information is needed (e.g., on pg. 4-294) in the Final RMP/EIS on how water quality is being threatened and impacted from contaminant sources. These sources include intrusion of saline groundwater,	Land use planning level decisions involve broad resource allocations and qualitative analysis is often all that is available. Further site specific analysis on the impacts to the resources specified by the commentor will be

			erosion of saline soils, invasive plants, introducing salts into riparian streams, metals and other chemical contaminants leaching from abandoned mines, temperature and restricted flows from return irrigation, erosion from fire-impacted areas, sedimentation from grazing and impacts from OHV travel and dispersed camping. Of special concern are the Kane Creek Crossing, Bartlett/Tusher/Ten Mile areas and Mill Creek.	conducted on the project level. The DRMP/EIS on pg. 1-14 recognizes that the BLM must comply with the Clean Air Act, the Clean Water Act, and many other nondiscretionary laws. This would include conformance with State and local laws.
U.S. Fish and Wildlfie Service	586	1	Specific land management measures should be developed to ensure and enhance long-term survival of Jones cycladenia, with the goal of de-listing the species. We would like to work with you to include in the final RMP resource management protections specific to the species' long term recovery.	Decisions within the plan protect the Jones cycladenia. These include limiting travel to designated routes and the imposition of a no surface occupancy stipulation for oil and gas and other surface disturbing activities within Jones cycladenia habitat. The Ida Gulch grazing allotment, which is almost entirely within Jones cycladenia habitat, is unavailable for grazing in both Alts B and Alts C (the preferred alternative).
U.S. Fish and Wildlfie Service	586	2	The bald eagle was removed from the Endangered Species list. It is, however, still protected under the MBTA and the BGEPA.	The wording in the plan has been corrected to correspond to this action. The two laws protecting bald eagles have been added to the text on pg. 3-143 of the DRMP/EIS.
U.S. Fish and Wildlfie Service	586	3	Page 2-5, Section 2.1.1.5 1st paragraph: The MFO has 3 listed bird species (and 1 candidate species), 1 listed mammal species, 1 listed plant species, and 4 listed fish species (see also Section 3.16). According to page 3-140, there are additionally 43 "Sensitive Species", not 4 as stated here.	The number of sensitive species has been corrected to 43. In addition, the enumeration of listed species has been changed to match USFWS's wording.
U.S. Fish and Wildlfie Service	586	4	Page 2-5, Section 2.1.1.5 1st paragraph: The standard stipulations that have been developed in coordination between BLM and FWS (i.e., the Species Conservation Measures in the BO for Existing Utah BLM RMPs (2007)), should be included in the document. Appendix K is a close approximation in many respects, but there are inconsistencies and rearranged organization, and it is difficult to determine if items have been left out. The 2007 BO conservation measures were mutually developed and agreed to by	This last sentence in the first paragraph on p. 2-5 of the DRMP/EIS has been changed to: "Species conservation measures (see Appendix K) have been developed in coordination with the United States Fish and Wildlife Service. They will be implemented under all alternatives." Appendix K has been updated with the 2007 "Species Conservation Measures for Utah BLM RMPs".

			FWS and BLM, and should be included in their entirety in the new RMP to ensure long-term species conservation as well as streamlined section 7 consultation. See attached document.	
U.S. Fish and Wildlfie Service	586	5	page 2-11, table 2.1 We recommend that BLM identify and incorporate the FWS Interim Guidelines for Wind Power (2003) in the "Management Common to All Action Alternatives" for the Lands and Realty section. Implementation of these recommendations will help to minimize impacts from wind power development projects to wildlife, particularly birds and bats, and their habitat.	The text on pg. 2-11 of the DRMP/EIS has been changed to read “Authorization of any ROW for wind or solar energy development would incorporate best management practices (including the United States Fish and Wildlife Service’s “Guidelines for Wind Power”…”
U.S. Fish and Wildlfie Service	586	6	page 2-12, table 2-1 It is unclear why Alternative C (Preferred) would make available for grazing 12,673 more acres than Alternative A (No Action). We recognize that this may be to allow for greater flexibility in grazing management, such as rest rotation techniques, which can benefit range and habitat. This is unclear, however, and we recommend that the purpose of increasing grazing acreage NOT be to increase AUMs within the MPA.	Pear Park and Ida Gulch have been added to the list of allotments that are unavailable for grazing in the preferred alternative. Pear Park was unavailable for grazing in the 1985 Grand RMP (for wildlife forage). Ida Gulch is in habitat for Jones cycladenia. Other allotments that are unavailable in Alt A but available in Alt C would be subject to range studies prior to determining suitable grazing allocations. If there were suitable permittees interested in applying for these permits, an Environmental Assessment would be conducted. One consideration that may be identified would involve nearby permittees utilizing these newly available allotments without an increases in total AUMs. Additionally, all newly available allotments would require Section 7 consultation which will insure that the concerns and recommendations of the USFWS are considered.
U.S. Fish and Wildlfie Service	586	7	page 2-95, table 2.2, Special Status Species - Impacts from Riparian management: There must be typos in these descriptions (at the bottom of page 2-95), because they do not make sense. Alt. C cannot be the same as Alt. B, except with less riparian acres excluded than under Alt. C. ??	The wording has been corrected.
U.S. Fish and Wildlfie Service	586	8	page 2-95, table 2.2 Special Status Species - Impacts from Minerals: A more quantitative comparison between	Table 2.2 is only a summary table; please refer to pages 4-371 through 4-380 for a more complete discussion and

			the alternatives would be more illuminating than simply saying "less mineral development… would occur" and that it would have the lowest/second lowest/second highest/highest adverse impacts. We recommend that you identify acreages for Closed, NSO, CSU, and Standard Stips to allow for a more informative, quick overview.	a comparison of leasing stipulations and acreages within habitats.
U.S. Fish and Wildlfie Service	586	9	page 3-38, section 3.73. A number of the allotments identified in this section contain special status species and should be further discussed in Section 4.3.15.6 (page 4-367).	The following sentence has been added to Chapter 4: “Those allotments that remain unavailable for grazing are not subject to these impacts to special status species.”
U.S. Fish and Wildlfie Service	586	10	page 3-125, section 3.15.1.1.2.2 (bookcliffs wildlife area) Is the clay reed mustard within the Moab Planning Area?	The USFWS is correct. This is an error. The clay reed mustard is not within the planning area; it is only within Uintah county.
U.S. Fish and Wildlfie Service	586	11	page 3-125, section 3.15.1.1.2.2. (bookcliffs wildlife area) typo-Jones cycladenia, with a small c.	The Jones cycladenia is not found in the Bookcliffs area. The text has been corrected.
U.S. Fish and Wildlfie Service	586	12	page 3-127, section 3.15.1.2.5 (colorado River corridor ACEC) 4th paragraph mentions "two state sensitive rare plants" but the State of Utah has no sensitive plant list. Are these listed on the UNPS rare plant guide or NatureServe?	The sentence has been changed to “Two BLM sensitive plants, alcove rock daisy (perityle specuicola)and alcove bog orchid (habenaria zothecina) occur in Negro Bill Canyon.”
U.S. Fish and Wildlfie Service	586	13	page 3-127, section 3.15.1.2.5 (colorado River corridor ACEC) 4th paragraph "Alcove rock daisy (listed)": listed by whom, and what is the latin name?	See response to comment 586-12.
U.S. Fish and Wildlfie Service	586	14	page 3-128, section 3.15.1.2.5 The Colorado River Corridor ACEC "…contains about one quarter of all threatened Jones cycladenia plants." Does this mean within the MPA or across the range of the species? What is the source of this information (citation)?	The sentence has been changed to read: “The potential ACEC also contains threatened Jones cycladenia plants.”
U.S. Fish and Wildlfie Service	586	15	3-143, section 3.16.1.3 This bald eagle section should be moved to Section 3.16.2 (Sensitive Speces).	This correction has been made.
U.S. Fish and Wildlfie Service	586	16	3-143, section 3.16.1.4 The first sentence ("MSO habitat includes high canopy closure…") should be eliminated. The second sentence should read: "Steep slopes and canyons with rocky cliffs characterize much of the MSO habitat in Utah."	The sentence has been eliminated and the second sentence has been adjusted in accordance with the commentor’s request.

U.S. Fish and Wildlfie Service	586	17	page 3-145, section 3.16.2 The descriptions for the sensitive species should include a description of their distribution within the MPA.	The addition of this information would require an array of maps that cannot be added to this section of the DRMP/EIS. Information on sensitive species distribution is available at the Moab Field Office.
U.S. Fish and Wildlfie Service	586	18	page 4-355, table 4.106 Place latin names after common names for plant species.	The Latin names have been added to Table 4.106 for all plants.
U.S. Fish and Wildlfie Service	586	19	page 4-357, table 4.106 MSO has designated Critical Habitat that contains habitat types of "Caves and Rock Crevices" and "Rocky Slopes and Canyons" within the MPA.	The Mexican Spotted Owl is listed under these two habitat types on pg. 4-357 of the DRMP/EIS.
U.S. Fish and Wildlfie Service	586	20	4-363 section 4.3.15.3.5 What habitat types is this section referring to, and what special status species might be affected?	The title of the section has been changed.
U.S. Fish and Wildlfie Service	586	21	4-365, section 4.3.15.5.3 Utility and communication infrastructure ROWs are also likely to fragment habitat, increase human access, and increase non-native invasive plants. These effects would have resulting impacts on various special status species, including prairie dogs and sage-grouse.	This sentence has been added to Section 4.3.15.5.3 of the DRMP/EIS.
U.S. Fish and Wildlfie Service	586	22	page 4-370 section 4.3.15.7.1 Mineral exploration activities would also lead to greater road density, creating greater opportunity for OHV and other human disturbance.	This sentence has been added to Section 4.3.15.7.1 of the DRMP/EIS.
U.S. Fish and Wildlfie Service	586	23	page 4-371, section 4.3.15.7.2.1 Potential direct adverse effects from oil and gas development would include: potential for spills, mortality from reserve pits, increased human access, OHV access, road mortality.	This sentence has been added to Section 4.3.15.7.2.1.
U.S. Fish and Wildlfie Service	586	24	page 4-372, section 4.3.15.7.2.2 Explanation for greater detailed analysis on sage-grouse is reasonable, but you should still describe the impacts to other species as well.	Wording has been added to clarify that the habitat fragmentation analysis was performed for sage grouse as an example of this type of action.
U.S. Fish and Wildlfie Service	586	25	4-372, section 4.3.15.7.2.2. 5th paragraph: It's also possible that the analysis could be an underestimate of habitat degradation because more frequently used roads could cause disturbance greater than 400m.	The following sentence has been added to pg. 4-372 of the DRMP/EIS: “It is also possible that the analysis could underestimate habitat degradation because more frequently used roads could cause disturbance greater than 400 meters from the road.”

U.S. Fish and Wildlfie Service	586	26	page 4-375, section 4.3.15.7.4 MSO do occupy rocky slope/canyon habitat in the MPA (not just the "potential" to occupy this habitat type).	The sentence now reads: "MSO are known to occupy the rocky slope/canyon habitat in the MPA.
U.S. Fish and Wildlfie Service	586	27	page 4-376, table 4.116. Why is there a difference of 37 acres between Alternative B and C for Jones cycladenia? Are these 37 acres in Jones cycladenia habitat? If so, we suggest these acres also be made NSO/Closed.	The 37 acres has been added to the Jones cycladenia habitat that is NSO or closed to leasing in Alt C.
U.S. Fish and Wildlfie Service	586	28	4-376, table 4.116. Some of the percentages of habitat designated NSO are very low -- for example, Alternative C (preferred) only sets 5% NSO for Gunnison sage-grouse, 1% for Gunnison prairie dog; <1% for white-tailed prairie dog, and 20% for MSO. These are very low levels of protection from oil and gas development and would seemingly have significant impacts. What other measures would be in place to provide protection for these species?	Controlled Surface Use and Timing Stipulations within identified habitats for many species have been imposed to protect the individual animals if an area is occupied. Standard Stipulations also provide mechanisms to allow for seasonal changes and local adjustments to avoid negative impacts to specific species or individuals. See Appendix C as well as species maps.
U.S. Fish and Wildlfie Service	586	29	4-390, table 4.119. The document states there are 24,370 acres of habitat for Jones cycladenia. Please clarify, is this the size of the amount of suitable habitat or habitat potential for the plant?	The habitat is suitable for Jones cycladenia. The word has been added to Table 4.119.
U.S. Fish and Wildlfie Service	586	30	4-390, table 4.119. Confused on the number of acres protected for Jones cycladenia. How is this number being obtained. Where is it being considered closed to leasing?	Jones cycladenia occurs in the Richardson Amphitheater area on gympsophile semi-barren soils. Within the Amphitheater, there are approximately 24,470 acres of this soil type, making it suitable habitat. It should be noted that the Jones cycladenia actually grows on a limited subset of this acreage. The Richardson Amphitheater area is closed or NSO for leasing due to a number of special values, of which the Jones cycladenia habitat is one.
U.S. Fish and Wildlfie Service	586	31	page 4-393, section 4.3.15.13.2.1. Are active Greater sage-grouse leks buffered in any way from construction of permanent structures? Permanent structures near leks increase habitat fragmentation and can create disturbance that can affect strutting, breeding, nesting, brood-rearing behavior, no matter what time of year they are actually constructed. We recommend a 2.0	Protections are provided for active Greater sage-grouse leks, including from the construction of permanent structures. See pgs. C-19 & C-21, which stipulate that no above ground facilities will be allowed within 2, 0.5 or 0.25 miles (differs by Alternative) from an occupied lek, on a year round basis.

			mile buffer unless it can be shown that the development will not affect sage-grouse or habitats during breeding, nesting, brood-rearing, and wintering periods.	BLM notes USFWS's recommendation of a 2 mile buffer. We currently have no active lek sites and have not had any known resident occupancy of sage grouse in over 10 years. On page 2-45 of the DRMP/EIS, it is stated that the BLM would follow pertinent Conservation Strategies and Management Plans, as needed, and work cooperatively with UDWR and other agencies. If occupancy and lek sites are discovered, the BLM would coordinate closely with UDWR, and if necessary, USFWS, to ensure propagation of new resident sage grouse within the Field Office.
U.S. Fish and Wildlfie Service	586	32	page 396, Table 4.123. Why are there no acres closed to OHV / lack of protection for Jones cycladenia? OR are these areas already currently closed?	See response to comment 586-1. Only heavily used roads are designated within the Jones cycladenia habitat area. No Jones cycladenia grow on the roadbeds. No new routes are proposed in this habitat, nor would new routes be granted in the future.
U.S. Fish and Wildlfie Service	586	33	page 4-486, Table 4.152 This habitat fragmentation analysis is a worthwhile and commendable effort. The table begs several question given, for example, that 64% of sagebrush/grassland habitats (and 54% of riparian and wetland habitat) will be "impacted" by habitat fragmentation caused by roads: 1) What will be the associated effects to these avian species? 2) Which of these species will be affected the greatest and to what degree (could it contribute to the listing of a species)? 3) How much of an increase is this from the baseline (existing condition)? 4) What are the cumulative effects on a regional scale (i.e. across the State of Utah, across the Intermountain West)? 5) What mitigating measures will be taken? We recommend that regional cumulative effects be evaluated, and species-specific evaluation be made to determine, to the extent possible, if future actions taken under direction of this RMP will be likely to significantly impact a species.	The habitat fragmentation analysis in Chapter 4 is intended to provide broad comparisons of the impacts of the four alternatives on wildlife habitat. It is not intended for specific comparisons or analyses. The analysis suggested by the commentor is not feasible in a broad document such as a land use plan.
U.S. Fish and	586	34	page C-35, table C-4. Golden eagles are not listed	The title has been changed in Appendix C to read

Wildlfie Service			under ESA. They are protected under the MBTA and BGEPA.	"Federally protected species"
U.S. Fish and Wildlfie Service	586	35	Page C-36, Table C-4. SWWF: As per the Species Conservation Measures in the BO for Existing Utah BLM RMPs (2007), 1) permanent surface disturbance should be avoided within 0.5 mi of suitable SWWF habitat, and 2) all surface disturbing activities should be restricted within a 0.25 mile buffer from suitable SWWF riparian habitat.	This stipulation was developed through coordination with the Utah BLM state office and the Utah USFWS state office specifically for oil and gas leasing and development. Appendix K gives additional Conservation Measures that would be followed. Additionally, any proposed project that is in proximity to potential or suitable SWWF habitat is subject to Section 7 consultation and will therefore have the needed protective measures implemented through this processes.
U.S. Fish and Wildlfie Service	586	36	Appendix D. The parcels identified for disposal should be specifically evaluated for potential for special status species.	The parcels identified for disposal have been screened for the presence of special status species. Parcel R-11 has been removed from the list because of the presence of Gunnison prairie dogs. Appendix A (pg. A-1) lists the criteria for the disposal of public lands. It states: "Lands will not be considered for disposal if they have: (a) any habitat for listed, endangered or special status species or (b) any habitat for any non-listed species if such action could lead to the need to list any species as threatened or endangered." Thus there is no need to specifically evaluate the potential for impacts to special status species.
U.S. Fish and Wildlfie Service	586	37	Appendix K. The BLM Committed Conservation Measures identified in this appendix should be consistent with the Species Conservation Measures developed for the Biological Opinion for Existing Utah BLM RMPs (2007) (see attached document).	Appendix K will be replaced with the correct and updated document.
The Hopi Tribe	868	1	Regarding B, C, and D, we do not support the 2/3 of sites allocated for scientific use, and less than 1/3 for conservation for further use. Avoidance of Hopi sacred sites and traditional use areas is the only real means of preventing impairment of these resources.	The BLM concurs with the Hopi Tribe that archaeological resources cannot be allocated to various uses prior to the study of these resources. The decision allocating archaeological resources has been removed from the PRMP/FEIS.
Town of Castle Valley	981	1	With regard to fire management, we fail to see anywhere in Section 4.3.3 on Fire Management a discussion of the issue of fire management on a designated sole source aquifer. We expect that any	Specifics as to fire management within the Castle Valley area are not a land use planning decision. Such specifics would be handled at the site specific fire project level.

			such activities need to be discussed and coordinated with our Town, and, as is stated in your draft, would need to undergo an EPA environmental review for compliance with the goals of the regulation, since they fall into the category of a federal project.	
Utah State Office of Education	1036	1	It is an incorrect analytical assumption by the BLM that "Non-BLM lands would not be directly impacted by RMP decisions since BLM does not make land decisions on BLM lands." [4.1.2 Analytical Assumptions, page 4-3.] Trust lands being managed in the most prudent and profitable manner is a very significant issue for Utah's public schools. None of the alternatives provide any analysis of the loss of revenue to the in-held school lands from formally or effectively eliminating development on lands surrounding the BLM property.	Non-BLM lands could be indirectly impacted by RMP decisions both positively and negatively. The analysis in Chapter 4 of the PRMP/FEIS has been modified accordingly. For specifics regarding the impacts on mineral revenue see comment 120-101. The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). A sentence will be added to Chapter 2, Lands and Realty,: Non-BLM lands could be indirectly impacted by RMP decisions both positively and negatively. The analysis in Chapter 4 of the PRMP/FEIS has been modified accordingly. For specifics regarding the impacts on mineral revenue see comment 120-101.The BLM does provide for reasonable access to all SITLA lands under all alternatives (pg. 4-3). Information will be added to Chapter 2, Lands and Realty, Management Common to all action alternatives, that states that reasonable access to State land would be provided including across BLM lands within avoidance and exclusion areas for rights-of-way as specified by the Cotter decision (Utah v. Andrus, 10/1/79). In addition, the Moab DRMP/DEIS travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision. Also, please see the revised analysis under Socio-Economics in Chapter 4 of the PRMP/FEIS.
Utah State Office of Education	1036	2	The Moab RMP addresses the impacts on tribal lands and interests. But it does not have similar sections addressing the SITLA lands and impacts, particularly on economic matters. Further, the BLM should go much further in counting the cost in economic impact to people of the state of Utah. The economic impact for the people in this area will be immense. This RMP has, in general, vastly understated the economic costs, and	See comments 120-101 & 120-103 for an explanation of closed acreage by alternative. In Alt B, the loss of revenue from SITLA wells foregone has been calculated and added to the analysis on page 4-264.

			vastly overstated the proportional importance of recreation.	
Utah State Office of Education	1036	3	Cutting off access devalues in-held school land, especially in Desolation Canyon area. For the BLM not to develop oil and gas in its sections also makes it impractical for development to occur on ours, which amounts to an unconstitutional taking. This is true where there are known resources, and may become true for areas in which no drilling has occurred. If the BLM decides that large areas of its land are off limits for drilling, that can effectively prevent feasible drilling on our in-held sections, amounting to a taking of the mineral value of our subsurface resources. The BLM should consider whether it will allow directional drilling from leases on school sections to access oil and gas lands on BLM property, with no surface occupancy of the BLM property.	The BLM acknowledges that the closure of adjoining public lands to oil and gas leasing may have a potentially negative impact on SITLA's mineral revenue. The assumption on pg. 4-3 has been changed to reflect this fact. In Alternative C, the closure of the 354,015 acres managed as WSA or Wilderness Areas is nondiscretionary and beyond the scope of this plan. In Alternatives A, C, and D there are no SITLA lands affected by discretionary closure. Chapter 4 of the PRMP/FEIS has been revised to reflect the impacts in Alternative B on SITLA inholdings of the discretionary closures of 266,485 acres of public land. It should be noted that under any Alternative, the proposed ACECs are not managed as closed to mineral leasing. Areas with wilderness characteristics are recommended as closed under Alternative B and No Surface Occupancy in Alternative C.
Utah State Office of Education	1036	4	Paragraph 1.3.2.2 – Issues Identified for Consideration - Issue 8 (page 1-10). This discussion should contain detailed reference to the issue of in-held state lands in special designations, particularly WSAs, ACECs, and areas to be managed for "wilderness characteristics," and the need to give priority to resolution of the in-held school land issue.	See response to comments 120-101, 120-103, and 120-106. It is not necessary to have this specific language stated in the description of the issue.
Utah State Office of Education	1036	5	Table 2-1 Description of Alternatives – Lands and Realty. It should be noted for all alternatives that, pursuant to the decision of the United States District Court for the District of Utah in Utah vs. Andrus, BLM is obligated to grant reasonable access to the State of Utah and its leases to school trust lands notwithstanding any special designation or avoidance/exclusion area for rights-of-way on intervening BLM lands. 486 F. Supp. 995 (D. Utah 1979). In furtherance of this obligation, no existing roads providing access to trust lands should be closed	The travel plan provides restrictions to the public for recreational purposes, but does not restrict uses permitted or authorized by the BLM. State inholdings may or may not currently have access, depending upon whether or not exisitng vehicle routes lead to them. Under different alternative scenarios, existing routes may be proposed to closure. BLM policy, as required by the Cotter decision (State of Utah v. Andrus, 10/1/79), is that "the state must be allowed access to the state school trust lands so that those lands can be developed in a manner that will provide funds for the common school…"

			without the consent of SITLA.	This decision confined the issue of access to situations directly involving economic revenues generated for the school trust. The recreation restrictions do not prohibit the State from reasonable access to its lands for economic purposes through separate permit authorization as specified by the Cotter decision. Routes to State sections may not have been identified for recreation purposes due to resource conflicts or actual route conditions.

INDIVIDUALS

Commentor Name		Record ID & Comment Number		Comment Text	Response to Comment
Geoff	Crockett	2	1	I am concerned that the public is not being given enough time to comment on the Draft RMPs that will be coming out over the next several months, beginning in August with the Moab plan. I am writing to ask that you extend the public comment period from 90 days to at least 180, to give people a legitimate chance to review the recommendations and make substantive comments. This is especially true for those without access to a computer or high speed internet, as it is my understanding tha the public is expected to view the document online. This seems like an unnecessary impediment to many members of the public who may wish to submit comments. The BLM should make paper copies of the document available to members of the public who wish to have one. The public should not be forced to pay exorbitant fees to have a copy of the plan printed.	See response to comment 124-1

Jim	Maxey	5	1	I feel that the Area of Critical Environmental Concern (ACEC) designations in Alternative "B" are completely inappropriate.	The BLM has followed the dictates of Manual 1613 concerning ACEC consideration. The commentor's opinion is noted.
William	Hughes	200	18	Squaw Park Area-A road from the Highlands departs from the Auger Springs area, UTM 4297680N 0637240E, to descend a slickrock dome into Squaw Park. From there it travels through some sand hills, into a wash bottom passing Caves Spring before ascending from the wash to the level of the road in Squaw Park, which it joins at UTM 4296820N 0638920E. Most of this route is clearly visible and mechanically constructed, the obscure parts are in the sandy sections.	This route seems to be the same as identified in Alternative A and included in the Grand County inventory. The County was unable to identify a purpose or need for this route, nor was any suggested by a member of the public during scoping. See response to comment 206-4.
Nick	Panos	393	1	Coyote Canyon is missing from Alternative C	See response to comment 206-11
Brad	Jarrett	394	1	Gemini Bridges should close	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Brad	Jarrett	394	2	Missing Segments include Flat Iron Mesa, Strike Ravine, and 3-D	See response to comment 206-11
Brad	Jarrett	394	3	I hope to be able to go to White Wash Sand Dunes and oppose fees.	See response to comment 123-10
Jolene	Jenkins	395	1	I want to see trails such as Flat Iron Mesa, Gemini Bridges, and Coyote Canyon open	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Lori	Edwards	396	1	Do not close Flat Iron Mesa, Coyote Canyon, and White Wash	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel

					routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Alan	Taylor	397	1	Gemini Bridges to stay open	See response to comment 206-14
Alan	Taylor	397	2	White Wash Sand Dunes should be enlarged	See response to comment 123-35
Lisa	Anderson	398	1	Trails that exist already should stay open such as the West Wakes WSA route. These proposals should have no "missing" sections because then you will conveniently forget to put them back on. The maps such as those of Flat Iron Mesa and Strike Ravine. Leave Gemini Bridges open for drivers and walkers. White Wash Dunes travel area should be much larger.	See response to comment 206-11
Rachel	Anderson	399	1	The two acres that stood out to me the most (that shouldn't be closed) were the 3-D Jeep Trail and the White Wash Sand Dunes.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Justin	Anderson	400	1	Alternative D closes far too many trails, specifically the White Wash Sand Dunes	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Justin	Anderson	400	2	Do not close Flat Iron Mesa, Gemini Bridges, 3D Jeep Trail, Strike Ravine, White Wash Sand Dunes	See response to comment 206-11
Ross	Tocher	401	1	White Wash Sand Dunes. BLM is on the right track in proposing an Area of Critical Concern here. I would urge expansion of the ACEC to cover the dune complex, along with associated bighorn sheep habitat, cottonwood groves, and water	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to

				sources. Situated less than 15 miles off I-70, these dunes will be popular with visitors for their beauty and ecological interest. It is time to phase out ORVs here and welcome the larger public to enjoy the area.	resources. This action would be based on monitoring and site specific NEPA analysis.
Ross	Tocher	401	2	I believe Canyon Rims should be managed as a quiet recreation area.	Commentors desire noted.
Carma	McElhaney	402	1	The overlooks of the Colorado River off Dry Mesa and the Egg Ranch Fin part of the Behind the Rocks WSA should be left open.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Doug	McElhaney	403	1	The overlooks of the Colorado River off Dry Mesa and the Egg Ranch Fin part part of the Behind the Rocks WSA should be left open.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Byron	Okubo	404	1	It is my understanding that you are considering designating some areas open to "cross country travel" by Trails Motorcycles and Mountain Bikes. I believe one area you are looking at is Pole Canyon. That would be a fantastic area for our sport.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Byron	Okubo	404	2	Parts of Black Ridge should remain open.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Carlo	Sanchez	405	1	The current proposal is unworkable because it puts too much strain on the resources in a limited	See response to comment 120-83 concerning enlarging the White Wash area to accommodate dispersed

				area with a very confusing boundary guideline. I am specifically talking about the camping area to the West of the Dunes.	camping.
Carlo	Sanchez	405	2	Implementing a "Fee System" with the introduction of the “Individual Special Recreation Permit” is unlawful, illegal, and counterproductive to the National OHV Recreation Fee Act set forth by Congress. The Moab BLM office is not above the mandates outlined by Congress. There are funding and grant programs that are REQUIRED to be exhausted first and then the public is again REQUIRED to be involved in the process.	See response to comment 123-26, as well as comments 122-22, 124-11, 124-112 , and 124-110 regarding clarification of SRP policies.
Carlo	Sanchez	405	3	The camping policy outlined in Appendix E is irresponsible as well. If an area is to be closed this MUST involve a lawful public planning process. Inclusively, if you look at your maps it is impossible to toll if the campsites we use are going to be open or closed.	Public participation has been solicited throughout the land use planning process. No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsite closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Kiel	Renwick	406	1	After reviewing the management plan options I feel there is a serious lack of details and boundaries missing. Many trails are missing sections that appeared to other 4x4 and biking enthusiasts such as Strike Ravine	See response to comment 206-11
Kiel	Renwick	406	2	Please add Coyote Canyon to your maps as it’s the only 5 rated true trail in the Moab area.	See response to comment 206-11
Bruce	Berger	438	1	Hell Roaring Canyon is no place for ORVs.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan

					based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Bruce	Berger	438	2	The Comment period for two decades of management for the RMP for such a vast area appears to be a rush to judgment. I recommend that the RMP be withdrawn as it currently stands, to give more time for serious deliberation by the BLM as well as unstampeded public comment.	See response to comment 124-1
Zachary	Huber	439	1	Don't close White Wash.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Duncan	Silver	441	1	To change the present land uses appears to be an attempt to add more de-facto park type area without any documented need. The DRMP indicates that there are changes that need to be addressed, but the needs are not specified. What are the changes that require this action?	Purpose and Need are outlined in Chapter 1, page 1-1 to 1-2. The BLM conducted a scoping period prior to the development of alternatives. The scoping process invites the public to raise issues that should be addressed in the plan. The public addressed such changes, such as the growing numbers of recreation users, the need for a travel plan and other changes since the 1985 RMP. Chapter 3 contains information regarding the affected environment, including how the resource or resource use has change over time. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis.
Duncan	Silver	441	2	The wilderness issue has been addressed and identified, it is time to move on and not create a	See response to comments 120-8, 121-10, 121-58, and 121-61.

				subclass wilderness designation as proposed. What is the legal basis for continuing to designate new wilderness areas?	
Duncan	Silver	441	3	All existing roads, trails and travel ways should remain open to all the public. The closures to motorized travel will stop our less fortunate public, the handicapped, from enjoying this area. Does the plan address the needs of the handicapped and address the federal ADA requirements?	The ADA accessibility guidelines do not specify or quantify the type or degree of access that must be allowed on public lands. The ADA does not require that all public lands be vehicle accessible. In addition, designated recreational motorized routes are an administrative decision and not subject to ADA. However, the ADA accessibility guidelines will be use in construction of any Federal facilities on public lands.
Duncan	Silver	441	4	The camping policy, Appendix E, lacks specifics as to where and what kind of camping is allowed in each area. Maps of camping should be detailed for the public information, with the camping opportunities clearly defined. Can you provide public readable camping maps?	Appendix E outlines areas of controlled and dispersed camping. See responses to comments 123-8 and 120-86 regarding designated and dispersed camping sites. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number depends upon site specific conditions. Dispersed campsites would be signed; however, maps and signage are not land use planning decisions.
Justin	Deschamps	442	1	Let's stick to the criteria that defined "wilderness" when the bill was passed years ago. The BLM should not be revising or altering this.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Justin	Deschamps	442	2	White Wash- The suggested open area is too small and will feel the impact of so many users in one small area. Please expand this at least to the Ruby Ranch Road beyond on the west, Duma Point on the east, and the Blue Hills Road on the north.	See response to comment 123-35
Justin	Deschamps	442	3	The camping policy in Appendix E is no good. The suggested policy will put everyone in tight spots, which will create impact problems.	See responses to comments 123-8. Dispersed camping is allowed on over 95% of the Moab planning area.
Justin	Deschamps	442	4	Right of way – Some of the trail designations outlined in Alternative D need to be reevaluated.	See response to comment 120-90

				Many trails are both ATV and Motorcycle trails. Many ATV and Motorcycle trails need to be opened to the other.	
Jason	Croates	443	1	Keeping some trails open: including Flat Iron Mesa, Coyote Canyon, and Gemini Bridges	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Jason	Croates	443	2	Lowering in number of rigs limited to running a trail together (49 down to 24)	See response to comment 123-26.
David	Whiteman	444	1	Include 300 miles or more of single-track trail	See response to comment 122-46
Gary C.	Taylor	445	1	Specific areas I would like to explore and that are in danger of closure are the White Wash Dunes, Flat Iron Mesa, Strike Ravine and Barlett Wash areas.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Mark	Murrell	446	1	One of our favorite areas for dispersed camping has been closed to that activity (the Blue Hills Road, Bartlett Wash area). Please don't close any more areas off to dispersed camping. I fully support that the final management plan must mandate full public involvement in any established and management of "restricted camping areas" or "controlled camping areas."	Blue Hills and Bartlett Wash areas are available for dispersed camping presently, although campers are restricted to designated sites and are required to carry out solid human waste. Camping at Bartlett Wash remains as is under the DRMP/EIS; should a developed campground be proposed at Bartlett Wash, site specific NEPA analysis would be undertaken. Full public involvement would be part of the NEPA analysis. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision.
Marty	Avalos	447	1	The White Wash area in Alternative C & D is not adequate. It restricts in some areas, which are the main reasons for going there in the first place.	See response to comment 123-35
Marty	Avalos	447	2	Mitigating potential problems with fencing is impractical and does not conform to the	See response to comments 208-3 and 479-6.

				environment.	
Marty	Avalos	447	3	Yellowcat and the Utah Rims should have a SRMA designation: Yellowcat to utilize the maze of existing mining roads, and Utah Rims should, as a minimum, extend to include Mel's Loop.	See response to Comment 122-38 regarding Yellow Cat, and 122-39 regarding Utah Rim SRMA.
Marty	Avalos	447	4	One area not addressed is the ability to manage the Public Lands in the Moab area. I suggest evaluation of the ratio of clerical staff vs. "in the field" staff. There is clearly a significant imbalance.	Staffing allocations are not a land use planning issue. The analyses on pg. 4-3 of the DRMP/DEIS assumes that there will be funding and work force to implement the selected alternative.
Cindy	Granquist	449	1	The Green River is not the right place for motorized vehicles.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Meredith	Rose	450	1	Closing off all but the necessary access roads into the area by Hell Roaring Canyon – there are irreplaceable cultural artifacts (pictograph panel and inscriptions) nearby and great access puts these resources at risk.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Meredith	Rose	450	2	Close off the road that runs along the river [in Labyrinth Canyon] for approximately three miles.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Shilpa	Reddy	451	1	I hope the BLM will not put additional roads through [Labyrinth & Hell Roaring Canyon] these canyons. There are cultural resources (like pictographs) and more roads would increase the opportunity for people to come in and vandalize these artifacts.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring

					and site specific NEPA analysis.
Kelly	Biaswell	452	1	Hearing of SUWA's proposal to keep this area [Dead Man's Point and Hell Roaring Canyon] unaffected by ORVs – by limiting current roads, I feel compelled to express my sincere support of maintaining what wilderness there is and increasing wilderness boundaries.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Arlene	Connely	453	1	Block off the side roads – specifically the one going into Spring Canyon.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Jason	Schmidt	454	1	The travel plan should include areas south of I-70 where a person can experience a primitive outing.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Jason	Schmidt	454	2	Please do not go ahead with your preferred. Excessive amounts of roads, especially south of I-70 and [Labyrinth Canyon]	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Josh	Brown	455	1	I worry that this area [Deadman's Point in general] will be negatively impacted under the new Travel Plan. It seems to me that the more roads and vehicles that criss-cross this area will bring more environmental degradation. I would love to see less roads included in this plan.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

Alex	Schwartz	456	1	I camp at Dead Man Point at the entrance to Hell Roaring Canyon. I would greatly prefer that the area is managed to minimized motorized vehicle traffic off of the main road access.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Alex	Schwartz	456	2	Labyrinth Canyon. I would like to see minimal motorized vehicle traffic in that vicinity as well. Please designate as few roads as possible.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
R. Lance	Wade	457	1	Management objectives that use such things as primitive recreation zones, Areas of Critical Environmental Concern, and so-called “areas with wilderness character” to create a de-facto Wilderness management are unlawful. Congress put a deadline on inventory and study for wilderness.	See response to comments 120-8, 121-10, 121-58, and 121-61.
R. Lance	Wade	457	2	Your open area at White Wash in Alternatives C and D must be expanded. It closes the killer hill climb and camping area to the west of the dunes.	See response to comment 123-35
Jay	Van Loan	195	1	Our main concerns include the possible loss of our grazing allotments in Utah, one managed by Colorado (error in labeling and road closure) and one managed by Utah (Non-WSA w/ Wilderness Characteristics), and the proposed road closures in Utah (Designated Routes), some of which will close our historic and only access across public land to our Colorado deeded land and Colorado/Utah BLM summer range. The proposed road closures will eliminate our historic access to our Utah BLM and State winter range.	Two routes that start in the State section (T. 21 S, R 26 E, Section 32) on the Colorado State line, cross Utah BLM land, and enter the state of Colorado have been added to the preferred alternative. Policy for voluntary relinquishments is given on page 2-12 of the RMP.
Jay	Van Loan	195	2	Livestock Grazing. There are two different Utah grazing allotments named Spring Creek in the	The confusion regarding the two Spring Creek allotments has been corrected in the PRMP/FEIS. The map has

				Dolores Triangle. One is the Spring Creek-Colorado allotment, #16115, managed by Colorado BLM as part of our Colorado allotment because it is not accessible from Utah. The other allotment is Spring Creek-Utah, which has been unavailable for livestock grazing for a number of years. These are two separate, non-contiguous allotments. The Spring Creek-Colorado allotment has been available for livestock grazing since the Taylor Grazing Act was enacted and has been managed by the BLM as part of our Colorado allotment since 1992. However, on map #2-4-A and map #2-4-B and in the narrative on page 2-13 the Spring Creek-Colorado allotment is incorrectly labeled as being unavailable for livestock and the Spring Creek-Utah allotment is not mentioned in the narrative or shown on the map. The Spring Creek-Colorado allotment would be made available for grazing under Alternatives C and D; however, this is also incorrect since it is already an active allotment. Please correct the status of the Spring Creek-Colorado allotment, located in Utah at the Colorado/Utah State Line, to an active allotment managed by Colorado BLM as part of our Spring Creek-Colorado allotment. Mr. David Williams, BLM Moab office, is familiar with the correct status of these two separate allotments.	been corrected.
Jay	Van Loan	195	3	Non-WSA Lands with Wilderness Characteristics, Alternative B. Our winter permit is the Big Triangle allotment, #05872, located in the Dolores Triangle. We acquired this permit in 1951. This allotment is designated as having Wilderness Characteristics in Alternative B. We disagree with this assessment due to the number of roads and uses within this allotment. The BLM 1999 Utah Wilderness Inventory did not include this allotment. On page 8 of the September 2001 Renewal of Term Grazing	The PRMP/FEIS restricts all vehicles to designated routes over the majority of the field office area. This is true regardless of the land's status as wilderness characteristics. That is, cross country travel is not allowed. If the permittee has a specific need to access a specific site by motorized vehicle, motorized access can be granted to the permittee. Horse use remains unrestricted. .

				Permit for Big Triangle Allotment it is stated, "At this time, no new significantly different information has been submitted that would compel BLM to reconsider the wilderness character of these lands or to believe that there is a reasonable probability that the area in question may have wilderness characteristics." The Wilderness Characteristics Review submitted by SUWA dated December 30, 2003, had "No" checked after the question "Was new information submitted by a member of the public for this area?" Should it be decided in the final Moab RMP to manage the Big Triangle allotment for wilderness characteristics, we request the use of motorized vehicles, including ATVs, by us and future permittees be grandfathered in for the movement and gathering of livestock, improvement work and allotment monitoring, which sometimes requires ATV off road use.	
Jay	Van Loan	195	4	Designated Routes-Spring Creek Canyon-Colorado access (Dolores Triangle). The Spring Creek Canyon-Colorado access road enters Colorado and then meanders back and forth across the state line as one travels up the south fork of the canyon to the Colorado BLM lands located on the western end of Pinion Mesa. This road is proposed to be changed to non-motorized in Alternative A and closed on Alternatives B, C and D. This is the only route across public lands we have available to access our upper private deeded land and Colorado BLM. This is the only route open to the public to access thousands of acres on top of the western portion of Pinion Mesa which includes the popular areas known as the "Hogback" and "The Big Lake." We need this road to stay open so we can stay in	Two routes that start in the State section (T. 21 S, R 26 E, Section 32) on the Colorado State line, cross Utah BLM land, and enter the state of Colorado have been added to the preferred alternative.

				business.	
Jay	Van Loan	195	5	Attachments: 3 files with referenced maps-Spring Creek Access Road; Big Triangle Access Road; Big Triangle + Spring Creek Access Roads Arial Map.	See response to 218-1.
Jay	Van Loan	195	6	Why are some roads which were constructed in relatively recent times for access to wildfires or for energy research and which were never intended to be public right of ways left open while long standing routes constructed to meet specific and vital needs many years earlier are selected to be closed?	The BLM worked with an interdisciplinary team of resource specialists, which included representatives from Grand and San Juan Counties to develop the alternatives for the Travel Plan in the DRMP/DEIS. The ID team reviewed each route for purpose and need weighed against resource conflicts. These conflicts are identified route by route in the GIS data developed for the Travel Plan which is available in the administrative record. The impacts identified for travel management in the DRMP/DEIS are derived from this data.
William	Hughes	200	1	Travel Management Map C is the best choice, with the adjustments listed below to correct errors or add interesting roads that were omitted. 1. Parts of roads used on five permitted Jeep Safari routes are missing from your Alternative C designated road map. I think this issue needs to be addressed before finalizing the plan. Details are provided in Appendix A. 2. There are a couple road segments in existing WSAs that I think could be reopened without impairing the suitability of the area for preservation. In one instance Search and Rescue efforts would be enhanced by this action. Details are provided in Appendix B. 3. The connection of the Klondike Bluffs Road from US 191 to the northern section of the Little Valley Road, as well as the connection at this point of the southern and northern sections of the Little Valley Roads, is missing from the maps. This is a part of the Copper Ridge Safari route and mentioned in Appendix A, but I imagine a lot of mountain bikers will be upset to lose this access to	See responses to comments 206-3, 206-10 through 21.

				the parking area for Klondike Bluffs as well. 4. Some routes shown on Alternative A in red, indicating they will be kept on the system in Alternatives C or D, do not appear on Alternative C. Three examples of this are included in Appendix C that are important to me, and I urge that they be added to the Alternative C map. 5. There are some road segments that are not Jeep Safari trails, but I feel they are important enough to note and ask for revisions on Alternative C to add them. These are covered in Appendix D.	
William	Hughes	200	2	SRMAs. I do not have any major objections to the establishment of the additional SRMAs as proposed. However, some boundary adjustments to allow for better, more understandable enforcement are needed for the White Wash Dune Area. I think the proposed South Moab SMRA should be expanded in size to include Black Ridge. I have seen the Ride with Respect group's proposal for additional focus areas in the enlarged version of this SMRA and it appears to contain excellent ideas. My only reservation is that the corrections to the Strike Ravine Safari Trail I mentioned in my Appendix A need to be incorporated into this proposal.	See responses to comments 206-2 , 206-9 and 206-10.
William	Hughes	200	3	I think that identification of Non-WSA lands with Wilderness Characteristics was outside the scope of analysis for an RMP. The time has long since passed that for WSA analysis, a point recent decisions in lawsuits concerning this matter reinforce. These areas should not have been isolated for special management, and therefore 0 acres should be selected under this heading, just like in Alternative A.	See response to comment 206-6.
William	Hughes	200	4	Permitted Jeep Safari Routes not on Alternative C. Copper Ridge-connection between southern and northern Little Valley Roads at Klondike	See response to comment 206-11 and 206-12.

				Bluffs Road intersection is missing. Another segment of the route, one that is used to bypass the difficult pipeline hill, is not shown on the map in it's entirety. It departs from the newer pipeline near US 191 at UTM 4282150N 0614340E and connects with a route shown on Alternative C at about 4283390N 0615420E. Next, there has been some discussion among CR trail leaders as to two modifications to the trail that would allow shortening it yet retaining the trail's character. These changes would require two road segments to be left in Alternative C that are eliminated from Alternative A. While there is no plan at present to ask for any changes to the Jeep Safari Permit, it would be desirable to keep these roads legal for future incorporation into the permit. The first starts at UTM 4286060N 0615910E in the Sovereign area, proceeds roughly ESE, and then turns NE to connect with the pipeline road about 4286190N 0617590E. This would allow using a segment of road that passed dinosaur tracks on the way to the usual lunch spot. The second road segment is a loop that starts from the Little Valley Road at approximately 4290630N 0614020E it starts in a SW direction, climbs the hill top, then beads NW along the ridgeline before dropping into a wash and bearing NE to reconnect back with Little Valley Road at 4291230N 0612940E. This loop provides some elevation gain and therefore produces nice views into Arches NP.	
William	Hughes	200	5	Strike Ravine Trail-two sections are missing. The N-S road crossing the private property that the Club had to defend it's right to use in court is not shown, approximate UTM4253670N 0638440E on the northern end,	See response to comment 206-11.

				4252320N 0638040E on the southern end; a portion of the "Big Ugly" hill is not shown UTM 4254480N 0638550E.	
William	Hughes	200	6	3D Trail-a section of road is missing from about UTM 4285900N 609900E north then west to UTM 4286400N 609300E.	See response to comment 206-11.
William	Hughes	200	7	Dolores Triangle Trail-an E-W shortcut near Steamboat Mesa, at about UTM 4295500N 668000E, is eliminated, and it is quite useful.	See response to comment 206-11.
William	Hughes	200	8	Flat Iron Mesa Trail-four portions of this trail are not included in Alternative C. First, from UTM 4246450N 636300E jiggling NW to the pipeline road. Second, from UTM 4245600N 634700E going SW to Plan trail. Third, from UTM 4246200N 633400E going SW to meet the SJ County B road. Also, at approximately UTM 4246440N 634910E the roads do not appear to connect, when in fact they do, and this connection is used on the Flat Iron safari trip. Last, the loop around "Hammerhead Rock" from about UTM 4242400N 633400E southerly and then east to the plan route. Another note for this trail, the last bit of the permitted route to the county B road has been fenced across with no gate, and a longer existing road is now used to reach the county road. It would be helpful to update this on the official map.	See response to comment 206-11.
William	Hughes	200	9	Road segments suggested for designation as open in existing WSAs: 1) Behind the Rocks WSA- Short segment to "Egg Ranch Fin", a nice viewpoint and a real thrill to drive. 2) Negro Bill Canyon WSA-the road west from Coffee Pot Rock. The western end is shown in Alternative D, but the connection to the Porcupine Rim Trail near Coffeepot Rock is not. It should all be in Alternative C.	See response to comment 206-20.

William	Hughes	200	10	Day Canyon Point-A side spur from the main road that heads west to an overlook of Long Canyon does not show the route's full length. It proceeds beyond what is shown to cross a small wash and end at a turnaround point. This serves as both a natural turnaround point as well as a nice starting point for a hike to overlooks of Long Canyon and the interesting rock formations along the rim in this area, it adds only about 1/8 mile. It begins at UTM 4268370N 0614600E and ends about 4267570N 0614830E.	See response to comment 206-13.
William	Hughes	200	11	Gemini Bridges-The club would like to see the road across the top of the bridges remain open.	See response to comment 206-14.
William	Hughes	200	12	Mill Canyon-A road that connects from the Mill Canyon Road on the north heads southward into Courthouse Pasture, connecting with roads there. It would also seem to be an important road for Search and Rescue efforts in the pasture area.	See response to comment 206-15.
William	Hughes	200	13	The Pickle-This challenging wash bottom route appears to be shown on the Alternative C map, but we want to be sure. It begins at the Bartlett Wash Road about UTM 4285183N 0605027E and heads up the wash to intersect the road to Hidden Valley about 4284925N 0604272E.	See response to comment 206-16.
William	Hughes	200	14	Flat Iron Mesa- A strong, useful connecting road that is shown on USGS maps exists between UTM 4245328N 0634685E (the main Flat Iron Road) and UTM 4245272N 0636835E (US191). This road connects with one shown on Alternative C, making that a connecting road rather than a dead end as currently mapped.	See response to comment 206-17.
William	Hughes	200	15	Ray Mesa & Lisbon Gap 15' Quad Area-There are some roads along the Utah/Colorado border that leave Utah and continue in Colorado. The roads referred to are in the Ray Mesa and Island Mesa area. A check with the Colorado BLM affirmed that	See response to comment 206-18.

				these roads were part of their existing legal travel routes (Julie Jackson, Uncompahgre Office, Nov. 13, 2007). Therefore, it makes no sense to eliminate the Utah end of a road if the Colorado end is legally open to travel, particularly when the Utah end is needed to access the Colorado section. The first road departs from a road shown on alternative C at UTM 4234752N 0669852E to head northeast, it wanders back and forth across the state border around UTM 4235280N 0670139E, and then continues northeast to intersect with another road in the Yip Yip Mine vicinity. The next road also departs from the same road shown on alternative C that was referred to above, about UTM 4233247N 0669563E. It travels generally eastward, crossing the state line at UTM 4233513N 0670416E as it travels along the southern end of Ray Mesa. The final road departs from the above mentioned alternative C road at UTM 4227870N 0670144E and heads eastward toward the Colorado line. Just before reaching the state line it heads north, and finally crosses the border about UTM 4227870N 0671005E as it continues eastward along a bench of Island Mesa.	
William	Hughes	200	16	Levi Well Road spur-There is an interesting route that follows a small, sandy wash bottom to access a unique terrace that features an array of balanced rocks. The route stays in the wash bottom, and visitors stop when they are in closest proximity to the balanced rocks. At this point they begin a hike to the terrace. I have personally done this trip several times, and it has been a thrill every time. It starts at UTM 4290910N 0593370E and	This route is not part of the Grand County route inventory, nor was it proposed during scoping. As a result, it was not evaluated in the DRMP/EIS. This route can be considered for identification on a site-specific basis in the future. See also response to comment 206-4.

				terminates within sight of the terrace around UTM 4290510N 0595440E. See Pictures included with this Appendix.	
William	Hughes	200	17	Tenmile Wash-An access road into Tenmile from the south is important. It serves as the only access from the rim viewpoints on this side of the wash into the wash itself. It is a well defined road that is only partially shown on the Alternative A map. It starts at the BLM fence line on the western side of the fence at UTM 4285890N 0589660E, roughly parallels the fence for a bit before heading slightly away from it. The Alternative A map terminates it at an ancient playa, but in fact it descends from there on a well defined mechanically constructed road, crosses the small wash to proceed down the other side, through a gate in a fence, and then proceed pretty directly to a descent down the last little bit into Tenmile at about UTM 4287670N 0588320E.	See response to comment 206-19.
Steve	Johnson	329	1	The BLM's proposed plan is badly over-weighted in favor of Off Road Vehicle Use.	See response to 124-9.
Steve	Johnson	329	2	The BLM plan promotes large-scale oil and gas development in sensitive areas.	The BLM strongly disagrees with the commentor's assertion that it is promoting large scale oil and gas development in sensitive areas. The BLM has excluded oil and gas development in the preferred alternative of the DRMP/EIS in many sensitive areas. These areas are identified in Appendix C of the DRMP/EIS and on Map 2-5-C.
Ian	Parish	330	1	Leave the Sand Dunes open to travel. The Dunes are the dunes, they recover from track at the nest wind storm, let people play.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring

					and site specific NEPA analysis.
Ian	Parish	330	2	Increase the number of people needed for group special permits. My friends, family and I can easily be a group of 24 people. Make use get a permit and special insurance for a weekend trip to Moab is silly.	See response to comment 123-26, as well as comments 122-22, 124-11, 124-112, and 124-110 regarding clarification of SRP policies and SRP group numbers.
Jim	Pendergast	331	1	Please review and rethink the proposed resource management plan and reduce the motorized areas, especially access to and along the Green River. Eliminate the road access through Hell Roaring Canyon.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Thomas J	Messenger	332	1	The preferred alternative fails to provide adequate protection for lands of wilderness character. Too often, especially in the transportation plan, the allowed uses are seen as balancing the claims of different recreation communities while actually it's a question of maintaining the natural character of the land. The most glaring example is the inclusion of only 18% of the land with wilderness character outside WSAs as AWCs.	The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-0550-1; BLM 1995). However, the BLM may manage the lands to protect and/or preserve some of all of those characteristics through the land use planning process. In addition, under the land use planning process, the BLM must consider a range of alternatives for the lands identified with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these Non-WSA lands. If all alternatives contained comparable protections of the Non-WSA lands with wilderness characteristics, the alternatives would have substantially similar consequences and would not be significantly distinguishable.
Thomas J	Messenger	332	2	The whole route from the mouth of Spring Canyon to the Hey Joe Mine should be closed to preserve the natural character of the river corridor and prevent conflict with recreation not at odds with that character. Additionally, route extends degradation of natural qualities on the floor of Hey	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring

				Joe Canyon well above the mine and turn-around by offering access to ATVs.	and site specific NEPA analysis.
Molly	Taylor	333	1	The status of the rivers and streams on the Green River: I support the dropping of the Swasey's to Ruby Ranch section. This stretch is highly impacted by road, highway, city (Green River), a low head dam, the boat ramp, a highway bridge, areas of historic use and then private land with structures (large homes) of Ruby Ranch area.	See response to comments 124-88, 124-91 and 407-3.
Molly	Taylor	333	2	The impact of groups of motorized ATV's or motorcycles is extreme [in Hey Joe Canyon] due to the nature of the echo of the canyon. A solution would be to eliminate ORV access to Hey Joe Canyon. Visitation to Spring Canyon and the river at Spring Canyon doesn't result in the noise since the groups tend to turn the motors off and lunch/visit the river. Spring Canyon seems to be a grazing allotment at the moment so the road access is necessary for the grazing.	See response to comment 122-7
Molly	Taylor	333	3	On other specifics I support the organization, Ride with Respect's RMP comments: -increase in ERMAs and SRMAs -some important links in the travel plan are missing and some roads could be closed -trails were not properly inventoried for bicycles, motorcycles and ATVs -White Wash should be open to cross country travel	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).
David W	Bodner	334	1	The Price Field Office did the draft for the Green River in Grand County while the Moab Field Office did the land portion in Grand County. The two offices did their work at different times and did not consult during the process. Price has found wild and scenic values for the river corridor while the Moab office wants to open the river corridor to 4x4, ATV, and motorcycle travel both on the rim and in the river corridor. The Moab plan will diminish, if	See response to comment 124-91.

				not ruin, the experience of those who float the river and enjoy its wild and scenic values.	
David W	Bodner	334	2	The preferred alternative has eliminated areas identified, by the BLM as having wilderness characteristics. These areas are to be managed as wilderness and protected until congress decides on their management. Turning them into motorized recreation is in direct conflict with the BLM mission and makes it impossible for these lands to be maintained with wilderness values. All areas identified by the BLM as having wilderness character need to be restored to that designation.	The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). However, the BLM may manage the lands to protect and/or preserve some or all of those characteristics through the land use planning process. In addition, under the land use planning process, the BLM must consider a range of alternatives for the lands identified with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these Non-WSA lands. If all alternatives contained comparable protections of the Non-WSA lands with wilderness characteristics, the alternatives would have substantially similar consequences and would not be significantly distinguishable.
David W	Bodner	334	3	The BLM has not identified a purpose and need for all 2642 miles for roads in the travel plan. As a matter of fact, the BLM did not ground truth the roads but only looked at a portion of them on aerial photographs. Multiple roads going to the same dead end location are neither needed nor sensible in the fragile desert country.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
David W	Bodner	334	4	The BLM used a map of roads that was provided by Grand County to create their travel plan. Grand County's plan was provided by a member of a local 4 wheel drive club. The BLM did not ground truth these roads due to a complete lack of adequate man power in the Moab field office.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
David W	Bodner	334	5	The BLM has not done adequate cultural surveys in the river corridor or the side canyons and rim, to determine if the travel plan will damage resources.	In accordance with the BLM Land Use Planning Handbook (1601.1), a Class I cultural survey was conducted. Travel Plan formulation is described in

				The National Park Service has been doing surveys in Canyonlands National Park, just downstream, and is locating multiple sites and many artifacts.	Appendix G. Each of the 33,000 routes was evaluated for its possible impacts to cultural resource, using Class I inventory methods. Many routes were deleted from Travel Plan alternatives due to conflicts with cultural resources. A full cultural inventory is not required for a land use plan. Washington Office Instruction Memorandum 2007-030 states that a Class III inventory is not required for the designation of existing routes. Furthermore, FLPMA states that in the development and revision of land use plans the BLM should rely on the inventory of the public lands, their resources, and other values, to the extent such information is available. The BLM will continue to enhance the inventory for high cultural value areas identified in the final plan. See also response to the submission by the Colorado Plateau Archaeological Alliance.
David W	Bodner	334	6	No economic impact study has been done to determine what this plan will do to our business community in Moab and Grand County. The BLM is ignoring their NVUM study that provides them with data that the vast majority of visitors come for quiet recreation. Why does the BLM see a need to change from less impactful recreation to extremely impactful recreation? Only 10.5% of the visitors surveyed came for motirzed recreation while 49.3% came for hiking. The results of the NVUM surveys are in direct conflict with the BLM's assumptions that all these roads are necessary.	See response to comments 124-2, 124-133 and 124-134. and 124-135. The NVUM study should not be considered a definitive snapshot of recreation activities in the MPA. The commentor seems to assume that recreationists to the Moab planning area (MPA) are cleanly divided into motorized versus non-motorized users, with members of one group never participating in activities associated with the other group. The BLM has no data to separate out motorized versus non-motorized recreation spending at this time, even assuming that the two groups are completely distinguishable. However, it is worth noting the growth that the economy of the MPA has enjoyed in the past decade, primarily in the areas of recreation and tourism, but also the presumably related second home market. This has occurred within the context of the current Grand Resource Plan (aka the No Action alternative), with its less restrictive OHV management. There is no reason to expect that a more restrictive environment for OHV recreation (as would be the case in all action alternatives) would harm these

					industries. Throughout its action alternatives, but especially in alternative C, the BLM has sought to provide recreation opportunities and benefits for the wide variety of users, all of whom potentially contribute to the local economy.
David W	Bodner	334	7	The BLM is ignoring FLPMA in not managing these lands “in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values: that, where appropriate, will preserve and protect certain public lands in their natural condition.”	See response to comment 122-9
John	Vetere Jr.	335	1	The BLM is always insisting that everything is based on these range assessments, however, you are proposing to continue to keep Bogart, Cottonwood, and Diamond Allotments closed in your RMP. We are not aware that the BLM has ever completed a range assessment on those allotments to decide if they should or should not be closed. This contradicts everything that we have been told by your office. The Moab BLM should take a hard look at whether or not these allotments can sustain grazing use. The BLM should work with permittees that would want to graze those areas to develop both a short term and long term plans. Closing these areas without study data and without field visits from concerned permittees is wrong and should not be supported. We were never notified of any such visits to the area or heard of the BLM doing any studies to support their stand that those allotments should be closed. If your staff has visited the area and collected information recently for the RMP we would like to request copies of it.	The decision to reallocate 100% of the forage previously reserved for livestock grazing was not based on specific range assessments for the allotments mentioned by the commentor. The forage on these allotments were reallocated to wildlife to enhance, protect and improve wildlife habitat, riparian vegetation and watershed values. In 1990, the Nature Conservancy purchased large private land holdings (Cunningham and Graham Ranches) and acquire the associated BLM grazing permit. Since that time, the ranches have been turned over to the Utah Division of Wildlife Resources. The State of Utah supports the continuation of the reallocation of forage in the Cottonwood, Diamond and Bogart allotments to wildlife. See response to the State of Utah’s comment, 120-6.
John	Vetere Jr.	335	2	If the BLM really wants to solve some grazing issues they would look at some of the poor desert allotments near the Colorado River way, and	The BLM Land Use Planning Handbook (H-1601-1) requires the BLM to identify lands available or nonavailable for livestock grazing. This is the only

				allotments that keep burning every year like San Arroyo and Harley Dome.	planning decision within the RMP. Decisions concerning timing and season of use are made on an allotment basis using the Standards for Rangeland Health and Guidelines for Grazing Management.
John	Vetere Jr.	335	3	We would like to see the BLM take an active approach to grazing management in the Bookcliffs.	The BLM Land Use Planning Handbook (H-1601-1) requires the BLM to identify lands available or nonavailable for livestock grazing. This is the only planning decision within the RMP. Decisions concerning timing and season of use are made on an allotment basis using the Standards for Rangeland Health and Guidelines for Grazing Management.
B	Tipps	336	1	I hope that you will consider extending the deadling for comments on this plan and the others that are on the street for comment or coming. That way, I can provide more specific comments.	See response to comment 124-1
B	Tipps	336	2	All areas identified in America's Redrock Wilderness proposal should be identified as wilderness in this plan and managed to conserve these values while the issue is being decided in court and congress.	See response to comments 120-8, 121-10, 121-58, and 121-61.
B	Tipps	336	3	My other large concern is regarding the archeological, historic, and Native American resources in the field office area. The protections specified in the draft RMP seem woefully inadequate to locate and protect these national treasures.	The commentors concerns about the proposed protections for cultural resources are not sufficiently articulated to allow a more detailed response. In addition, all cultural resources are protected by law.
Sara Ann	Phillips	337	1	I clearly see the holes in the Moab Resource Management Plan and the lack of a balanced-approach when it comes to managing these magnificent public lands.	The commentor has not provided any specific information regarding a lack of a balanced approach to which to respond. Alt C provides a balance between resource protection and commodity production.
Sara Ann	Phillips	337	2	It appears that much (almost 90%) of the lands with scenic, cultural, or ecological importance and qualify for “Areas of Critical Environmental Concern” will not receive that protection. Yet, it is federal law that those lands be given PRIORITY consideration.	See response to comment 124-68 regarding ACEC designations.

Sara Ann	Phillips	337	3	Of the 464,777 acres of non-WSA lands that qualify as wilderness, which are in America's Red Rock Wilderness Act, you propose to protect just 47,761 acres or 10%. And, your agency proposes to designate 2,652 miles of ORV routes, many on lands within America's Red Rock Wilderness Act and which BLM previously said had wilderness character, i.e., were "roadless." Damage from ORV use will be widespread and cannot be reversed.	The BLM examined about 558,807 acres of lands proposed in the Red Rock Wilderness Act for the existence of wilderness characteristics. The BLM found that 266,485 acres of these lands contained wilderness characteristics and are proposed for protective management in Alternative B.
Sara Ann	Phillips	337	4	I am disappointed in how the agency handled the "Public Participation" as required by FLPMA. First, by having RMP's for five other areas in Eastern Utah in some form of public comment right now, you are creating confusion and frustration for the public and stakeholders, thereby probably detracting from the quality of public comment that you will receive. Even worse, you have taken seven years to write this version and now you give the public 90 days. For a plan that covers 1.8 million acres, with a time of over twenty years, this is hardly adequate to gather a wide and deep pulse for how your public would like to see their lands managed.	See response to comment 124-1
Mike, Becky, and Mason	Weilmuenster	338	1	Places that have been open to vehicle traffic for decades are now being called Wilderness by people that most certainly don't travel through the area other than on the dirt roads.	Not a comment; no response required.
Mike, Becky, and Mason	Weilmuenster	338	2	Having designated camping spots is unecessary. People camp or park in the places they have been doing it in for years. The lay of the land already limits how many can park there. Most of the vehicles that camp there are self-contained RVs. So I stronly oppose the camping policy in as outlined in Appendix E of your current draft plan.	See responses to comments 123-8. Dispersed camping is allowed on over 95% of the Moab planning area.
Mike, Becky,	Weilmuenster	338	3	Plans proposed by the group "Ride with Respect" and USA ALLIANCE/BLUE RIBBON COALLITION	NRR

and Mason				make far more sense than the other options.	
Mike, Becky, and Mason	Weilmuenster	338	4	The FEIS should consider adding more single-track and designated OHV areas and maintaining them with proper signage containing trail ettiquite reminds along with historical or ecology facts about the specific trail/road/wash/mine/well site/ranch etc.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Mike, Becky, and Mason	Weilmuenster	338	5	The BLM needs to sitck with it's congressional mandate to manage these lands according to the multiple use/ sustained yield paradigm described by law. Allowing OHV enthusiasts, mountain bikers, hikers, equestrians, and energy developers to share these public lands and use them wisely.	Under FLMPA, multiple use is defined as the management of public lands and their various resource values so they are used the combination that will best meet the present and future needs of all the American people.
Dusty	Pederson	339	1	Your open area at White Wash in Alternative C and D should be expanded. Closing the challenging trails like killer hillclimb will not add to the experience of Moab.	See response to comment 123-35
Dusty	Pederson	339	2	Fencing off areas around resources will not add to the aesthetics, public education for all would be a better alternative	See response to comments 208-3 and 479-6.
Dusty	Pederson	339	3	The fee system as proposed does not seem to make much sense, I am willing to support funding for infrastructure if existing funding is inadequate but please do not impose "individual Special Recreation Permit" programs. Everyone should pay the same no matter what mode of transportation.	See response to comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes. See response to comment 123-26, as well as comments 122-22, 124-11, 124-112 , and 124-110 regarding clarification of SRP policies.
Dusty	Pederson	339	4	The Utah Rims SRMA would help manage this popular area.	Commentor's statement is noted.
Diane	Spengler	340	1	Your open area at White Wash in Alternative C and D should be expanded. Closing the challenging trails like killer hillclimb will not add to the experience of Moab.	See response to comment 123-35
Diane	Spengler	340	2	Fencing off areas around resources will not add to	See response to comments 208-3 and 479-6.

				the aesthetics, public education for all would be a better alternative	
Diane	Spengler	340	3	The fee system as proposed does not seem to make much sense, I am willing to support funding for infrastructure if existing funding is inadequate but please do not impose "individual Special Recreation Permit" programs. Everyone should pay the same no matter what mode of transportation.	See response to comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes. See response to comment 123-26, as well as comments 122-22, 124-11, 124-112 , and 124-110 regarding clarification of SRPs policies.
Diane	Spengler	340	4	The Utah Rims SRMA would help manage this popular area.	Commentor's statement is noted.
Bobby	Mock Family	341	1	As for fencing cottonwood trees in White Wash, this seems utterly unecessary and costly.	See response to comments 208-3 and 479-6.
Bobby	Mock Family	341	2	The final plan should include full public involvement, and not just specialm monied, environmental groups. If "user conflict" is noted, the BLM should simply re-route one of the uses. Horses or hikers can easily take a side trail.	See response to comment 123-14
David	Rodgers	945	1	after reviewing the entire Moab RMP, I have some serious concerns about your management plans. I do not agree that any of the Alternatives go far enough in protecting the wilderness, wildlife, wildlife habitat and cultural values (archaeological sites) in the WSA lands and on the non-WSA lands with wilderness characteristics. Since these lands have been recognized as having wilderness potential by the BLM (and many other individuals and organizations, of course), they should be managed as wilderness until final decisions are made regarding their inclusion in normally designated wilderness areas. Therefore, they should be closed entirely to (1) motorized vehicle use on or off existing roads/ routes; (2) minerals, oil and gas exploration/ development; and (3) livestock grazing. These land with wilderness potential make up only a small part of the Moab BLM area--- there is plenty of land reamining	The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Any Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the management prescriptions established in the RMP. These Non-WSA lands have many resource values and use in addition to wilderness characteristics. The DRMP/DEIS considered all available information and a range of alternative prescriptions for how these values and uses would be managed. For example, in Alternative B, most of the Non-WSA lands are open to oil and gas leasing subject to standard lease terms and conditions. While Alternative C is designed to provide maximum conservation and

				available for properly-managed vehicle use, livestock grazing, and mining/oil & gas exploration.	protection of natural resources from resource development and use. Under Alternative C, some Non-WSA lands with wilderness characteristics would be closed to leasing and most Non-WSA lands with wilderness characteristics would be leased subject to either minor operational constraints like timing limitations or controls on surface use, or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the DRMP/DEIS) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources
David	Rodgers	945	2	all critical wildlife habitat (including ACEC's in Alternative B) and archaeological sites outside the lands with wilderness potential should be given the protection they need to preserve them.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use.

					. . .” (FLPMA, Section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. The DRMP/DEIS contains alternatives which strike an appropriate balance between environmental protection and recreation and development on our public lands The PRMP/FEIS will offer BLM management the flexibility to protect resource values and uses while allowing for acceptable levels of recreation and development.
David	Rodgers	945	3	_____ appropriate wildlife habitat improvements, such as non-native vegetation control, guzzler construction, and depleted rangeland restoration as needed throughout the Moab BLM area.	The commentor's desire for the BLM to undertake wildlife habitat improvements throughout the MPA is noted.
David	Rodgers	945	4	Regarding the Wild & Scenic Rivers designation, I would agree with Alternative B but with the strong recommendation that all motorized vehicle and mining activities be kept outside of corridor along both sides of the rivers so that those floating the rivers cannot hear or see these activities, and so that wildlife dependant on these riparian areas are not disturbed.	See response to comment 124-88.
Ruxton	Noble	946	1	Many of the important motorcycle trails are not on any of the alternatives. The Utah Rims area, for example, is far from a complete inventory, as well is the area north of I-70. The Thompson Trail is an epic ride that offers an endless single track experience that is vary hard to find. It should be combined with Copper Ridge Motorcycle Loop in the final plan. Since no inventory was done on single track trails, the BLM should continue accepting data. I recommend that routes provided by Ride with Respect, the Sage Riders, and other individuals be investigated and considered for the	See response to comment 122-14

				final plan.	
Ruxton	Noble	946	2	The "individual Special Recreation Permit" program does not seem reasonable, and since it would be accessable from all directions, difficult to enforce.	See response to comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes. See response to comment 123-26, as well as comments 122-22, 124-11, 124-112 , and 124-110 regarding clarification of SRP policies. Enforcement actions are administrative and do not require land use planning decisions.
Ruxton	Noble	946	3	The Bartlett Wash Slickrock is also a favorite. This needs to continue to be open to motorcycles as well as the Slickrock Bike Trail which was developed by motorcyclists.	See response to comment 122-42
Mike	Coronella	947	1	What is the justification for this plan? The vast majority of local residents AND visitors don't want the Moab area to be destroyed, yet this proposal not only allows for such destruction, it facilitates irreversible damage.	The BLM's Alt C provides protections to important resources within the planning area.
Mike	Coronella	947	2	When the proposed road density is as great as the BLM accepts in this RMP, it becomes literally unmanageable--- a plan that allows high impact activity on such a huge proportion of our PUBLIC lands is simply a recipe for chaos.	The commentor's preference for fewer designated routes is noted. Alt. C designates 2,500 fewer miles of route than under the No Action alternative. The BLM asserts that by eliminating over 2,500 miles of routes, it will have created a more manageable route system.
Mike	Coronella	947	3	I'll also put out this perspective: I am a member of Grand County Sheriff's Search and Rescue; are we now being forced to travel into more and more dangerous situations merely so someone can have easy motorized access? This plan opens up a huge and unnecessary challenge to those who volunteer their time for the public's well being.	The Travel Plan restricts travel by not designating 2,500 miles of "D" route that was inventoried by the county and verified by BLM. Thus, the "easy motorzed access" referred to by the commentor has not been opened up.
Mike	Coronella	947	4	I wish I had more time to offer comments in greater debth and detail, but the BLM has seemingly done it's best to limit the time and quality of comments by puttingn no less than six major RMPs on the table at once--again (like this plan) doing a great disservice the very people who own, use, and enjoy these public lands.	See response to comment 124-1

Alison	Gartlan	948	1	Federal Law requires the BLM to give priority to the protection of lands which qualify as "Areas of Critical Environmental Concern" because of senic, cultural or ecological importance. However, the Moab BLM plan would fail to protect 90% of the 613,077 acres which qualify for ACEC designation. Please revise the RMP to reduce the destructive and redundant web or ORV routes. The Moab area, as with the rest of the state, should provide opportunities for traditional non-motorized use and provide ecological havens for the long-term health of the land, the wildlife, water and other natural and cultural resources.	See response to comment 124-68 regarding ACEC designations.
J. Michael	Salbaum	949	1	Specifically, I would hope that you would reconsider the closure of several Jeep Safari Trails. Short segments for the Flat Iron Mesa, Strike Ravine, and 3-D trails are missing from the travel plan. This seems to me as a backhanded way to close EJS trails, because when parts of the trail are missing , the entire trail becomes unusable. Closing long- accepted and established EJS trails is not a good idea, and I would like to point out how important the famous EJS trails are for the economy of a small town like Moab.	See response to comment 206-11
Cynthia	Smith	950	1	I think the comment period should be opened up again. Ninety days was not adequate time in which to review the huge volume of material covering this historic decision concerning this special Redrock country.	See response to comment 124-1
Cynthia	Smith	950	2	I would like to see the Green, Colorado, Dolores, Mill Creek, and Negro Bill Canyonas suitable to become Wild and Senic Rivers. I am especially concerned about the Colorado and even more so about the Green River. All the Green River needs is to be declared suitable, including the section from Swasey to river mile 97 as was seen in the Price Office preferred draft in 2004. To leave out	See response to comments 124-88 and 124-91.

				this section would endanger the rest of the river system. All of the suitable river segments should maintain their stattus. These rivers offer unparalleled opportunities to enjoy flowing waters in a wilderness setting. They are also the backbone of a significant part of our tourist industry, and if they are denigrated people will not come. This is already happening to the biking industry as more areas are opened to up to motorized vehicles.	
Raven	Tennyson	951	1	Where is the historic information which shows us how the land has changed over time, giving the BLM the reasons to make changes?	Chapter 3 contains information regarding the affected environment, including how the resource or resource use has changed over time. A systematic interdisciplinary approach was used to provide accurate, objective and scientifically sound environmental analysis on the environmental consequences associated with the management actions or prescriptions under each alternative. The analysis discloses the direct, indirect and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives.
Raven	Tennyson	951	2	Where is the analysis of the drought conditions of the land and its effects on grazing?	All specific decisions on grazing are made at the allotment level, using the Standards for Rangeland Health and Guidelines for Grazing Management (see Appendix Q). On pg. 2-50 of the DRMP/EIS, criteria for restricting activities, including grazing, during drought are given in management common to all action alternatives.
Raven	Tennyson	951	3	Where is the analysis as to whether cattle grazing is financially still feasible? What other sustainable options are available which support long term health of the land? Where is the long term plan for phasing out allotments that are not economically sustainable? Where are the allotments that will be phased out to allow for increased rangeland diversity of plants? Is there a balanced approach to plant diversity and use of the land?	The land use planning decision regarding grazing is only whether or not a particular allotment is available or unavailable for grazing during a particular planning cycle. All specific decisions on grazing are made at the allotment level, using the Standards for Rangeland Health and Guidelines for Grazing Management (see Appendix Q). A socioeconomic analysis of the feasibility of cattle grazing is not part of land use planning decision and is beyond the scope of the RMP
Raven	Tennyson	951	4	Where are the sections that show how you are	See response to comment 121-2.

				monitoring the success of the plan and that show us the success of the last plan?	The 1985 Grand RMP has a monitoring report that is updated to track the implementation of plan decisions.
Raven	Tennyson	951	5	Where are the sections that address NOISE POLLUTION in the plan? One of the unique great gifts of the area is its quiet and it is not even addressed!	See response to comment 122-7.
Raven	Tennyson	951	6	Where are the specifics as to how you will educate the public to the value of these lands in concrete ways. How will you monitor the success of this?	See response to comment 123-20
Raven	Tennyson	951	7	What are the strategies for visitor outreach? What has been done? What are the projections for the 20 years?	Education/public outreach are all administrative actions and not land use planning decisions. The BLM projects that recreation use in the Moab planning area will increase slightly, but not at the rates of increase in the 1990s.
Raven	Tennyson	951	8	How do you monitor noise levels in WSAS?	Noise levels in WSAs are not monitored on a routine basis. Since WSAs are closed to motorized travel and other surface disturbance, any noise is likely to be from outside the WSA boundaries. WSAs must provide either outstanding opportunities for solitude or primitive and unconfined recreation, but such opportunities need be present only somewhere within the WSA, and not necessarily everywhere.
Raven	Tennyson	951	9	How do you monitor people who violate WSAs while driving in closed areas?	Enforcement actions are administrative and do not require land use planning decisions.
Raven	Tennyson	951	10	What are the projections for use in wilderness? How do you measure the intrinsic and spiritual value of sacred lands?	See response to comment 121-71.
Joey	Norton	953	1	An existing and documented route exists on the southern side of the Colorado River within the boundaries of the Westwater WSA. The route begins outside the WSA and terminates near Star Canyon. This route has been open for decades, and it appears on USGS topographical maps from the 1970's. Alternative D proposes that this route remain open, and we would like to see that	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				recomandation implemented in the Final RMP and Travel Plan.	
Joey	Norton	953	2	Several short route segments associated with permitted Easter Jeep Safari routes are missing from the proposed Travel Plan maps. The segments are located on Flat Iron Mesa, Strike Ravine, and 3-D. I was informed this is merely an accidental omission, but would like to formally request that these segments be included on the final maps.	See response to comment 206-11
Joey	Norton	953	3	The proposed action of limiting vehicle camping to "designated campsites" is unheard of on such large portions of public land. I strongly oppose the camping restrictions as outlined in Appendix E. while many campsites appear to remain open, the detail level of the available maps limits our ability to determine if all of the most favored campsites will be open.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsite closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Randall	Parsons	954	1	We have greatly enjoyed the time we have spent there and are very disturbed at the plans you are attempting to set forth there. This area is not a national park and should not be treated as such. These areas have along history of mining and ranching with many established access routes. They are the epitome of the Multiple Use/ Sustained yeild principal that has successfully guided the decision making process for the BLM for many years. The Wilderness Study areas and areas with wilderness character are just plain wrong. They are de-facto wilderness. Wilderness areas must meet specific criteria to be designated as wilderness by congress. Either these areas fit	The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)).) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related

				the criteria or they don't. Those that do not should be released back to general use immediately. I am strongly opposed to the proposal set forth by the Southern Utah Wilderness Association.	services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, the BLM’s Land Use Planning Handbook (H-1601-1) directs BLM to “identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics.” See response to comments 120-8, 121-10, 121-58, and 121-61.
Randall	Parsons	954	2	Regarding the three alternatives proposed for travel management by BLM there appears to be very little to distinguish them apart. None of them are acceptable to me in terms of motorized recreation. The increased motorized use of the area by the citizenry is a strong indicator that what the public wants are more places to ride, not less! In the twenty years I have been riding these areas I have seen little change in the land which is for the most part rock and sand. The area is totally formed and shaped by erosion. How can some tracks in the sand make any difference at all? Frequently after a rain or wind event you really have to search to determine where the trail is. Please remember that as a public agency you	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.

				need to seriously weigh the needs of all the people who want to use the land, not just those who would reserve it for the uses they see fit.	
Randall	Parsons	954	3	The proposed camping regulations and fee system for the White Wash area are completely off base. These are public lands served by country roads. There are no services such as water or electricity offered. The camping is on sandy rocky barren areas. We do not want to be crowded into restricted areas. If funding is needed there is existing funding and grant programs that can be utalized. There are many areas that can be used for dispersed camping. The money needed to enforce and monitor such a program if available would be better spent addressing issues such as parking, signing and trail maintaince.	See response to comment 120-83 concerning enlarging the White Wash area to accommodate dispersed camping. See comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes.
Randall	Parsons	954	4	In reviewing Appendix E of the plan regarding camping in designated camp sites only I find that wholly unnacceptable. There are so many areas that I have camped where you only need to pull off the road a short distance and have a wonderful camping experience that I shudder to think of losing the ability to do that. Again we are talking about an area that is likely san and rock that is constantly being scoured by the elements such that traces of your camp will soon be obliterated. Also there are new and old mine sites and gas and oil drilling rigs nearby in most areas. These areas are not a National Park! Dispersed camping must be allowed. Any closures of camping areas should be done with the full involvement of the general public so that the public is allowed to comment specifically on each location.	See response to comments 123-8 regarding dispersed and designated camping. Dispersed camping is allowed on over 95% of the Moab planning area. See response to comment 120-86 regarding access to dispersed campsites. One of the express purposes of leaving a route open for travel was to provide access to a campsite. If roads to specific dispersed campsites have been omitted in the Travel Plan, they may be added at a future date through site-specific NEPA analysis. Public participation has been solicited throughout the land use planning process; however the process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision.
Randall	Parsons	954	5	Special Recreation Management Areas are useful tools for managing areas of special interest or high recreational use. They need to be dynamic rather than static so that as demands change the trail	See response to comment 413-9.

				systems can be expanded or changed to accommodate increased public usage. These areas will by nature have a particular focus but must not let that focus exclude usage by other user groups.	
Randall	Parsons	954	6	The Utah Pims SRMA is important to manage a high use area with a primary focus on motorized and mechanized recreation. Given the high levels of usage the abiltiy to expand and modified trail networks is important. Also the area should be expanded to the southwest to include the popular Mel's Loop area which provides a changelling long distance single track motorcycle trail.	See response to comment 122-39.
Randall	Parsons	954	7	I would like to suggest the Yellow Cat area east and north of Arches NP to be considered as potential SRMA. The area is seeing increased use and as it has a dense network of old mining roads it would be an ideal area for a trail network.	See response to Comment 122-38
Randall	Parsons	954	8	No inventory was done on the single track trail network. Because of this I believe that there should be an ongoing evaluation of new trails to be considered as part of the trail network. I would like to see about 300 miles of trail through out the area in question. That would keep the users spread around and provide a challenging and interesting system of looping and interconnecting trails. These types of trails are the best means for keeping on designated trails.	See response to comment 122-14
Maggie	Wilson	955	1	Among the mountain bike user group I have noticed a steady increase in the appreciation and demand for single track trails with all levels of difficulty. I request the BLM continue to provide and develop additional opportunities for these kinds of quality experiences. In Grand County there exists a special relationship and understanding between the mountain biking and motorcycling user groups; all enjoy and prefer to	The BLM asked for specific route submissions from mountain bikers and motorcyclists during the scoping period for the Draft RMP/EIS. The BLM received specific route submissions during that time. Each of these submissions was verified, and considered during the planning process (see Appendix G for a description of the Travel Plan). Those single track routes that are in the Travel Plan are a result of this process.

				ride on single-track trails! By providing diverse recreational opportunities with sufficient quantity and quality, like those proposed by Ride with Respect, the BLM can succeed in protecting natural resource values while providing increased recreational opportunities which will reflect positively on the social economy by attracting more recreationists and visitors to Grand County.	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).
Maggie	Wilson	955	2	Support limiting motorized travel to designated routes, areas and inventoried roads for mechanized travel. Sections 3.11.1.2.16 and 17.2 (pages 3-79 and 3-158) of the DRMP estimate road mileage based on county inventories which identify "motorcycle routes" that exist around White Wash. This area has historically served much of the motorized community by providing motorcycle singletrack and ATV trails specificially. The off-highway vehicle trails that exist in high concentration from "Utah Rims" to Cottonwood Wash, isolated OHV routes that exist throughout the Moab field office, such as the Thompson Trail and MOUNTAIN BIKE TRAILS THAT EXIST BEYOND THOSE MAPPED IN ALTERNATIVE D SHOULD ALSO BE INCLUDED IN THE FINAL RESOURCE MANAGEMENT PLAN (RMP).	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Adam	Faleck	216	1	I support the area and route designations proposed by Ride with Respect, nonprofit	NRR
Adam	Faleck	216	2	The plan should more explicitly state that conflict is exacerbated by crowding. Additionally, the plan should better address the scope of conflicts. They occur at society, group, and individual levels. They occur between management, user groups, and within user groups. Although conflicts generally begin asymmetrically, the direction is not always consistent. Finally, the plan should acknowledge that conflicts become symmetrical when management actions unduly restrict the	The BLM's responsibility is to address recreation conflicts that occur on BLM lands, and to allocate among varying types of recreation users. The general nature of societal conflicts is not a land use planning issue.

				more dominate uses.	
Adam	Faleck	216	3	For planning, I suggest highlighting one more critical item. Noise is the most common complaint against OHVs. Thus for all vehicles across the entire field office I recommend implementing and enforcing and 96-decibel limit based on the "20 inch" test (SAEJ1287)	See response to comment 122-14
Adam	Faleck	216	4	Sections 3.11.1.2.16 and 3.17.2 (pages 3-79 and 3-158) estimate road mileage based on country inventories. They mention that "motorcycle routes" exist around White Wash. The document should specify that this includes motorcycle singletrack and ATV trails. Additionally, off-highway vehicle trails exist in high concentration from "Utah Rims" to Cottonwood Wash. Isolated OHV routes exist throughout the Moab field office, such as the Thompson Trail. Mountain bike trails also exist beyond those mapped in Alternative D	See response to comment 122-46
Adam	Faleck	216	5	In the Moab field office, non-road mountain bike, motorcycle, and ATV trails were never inventoried. The only exceptions are roughly 15 square-miles around Bitter Creek and 100 square-miles around White Wash, which together comprise less than 5% of the field office. Grand County's Trail Mix Master Plan highlighted many popular bicycle trails, but was not intended as n inventory. Beyond the county roads, several hundred miles of trail exist, if not thousands. Short of performing an inventory of trails, Moab BLM plans should at least acknowledge that they cannot fully measure the impacts to bicycling, motorcycling, and ATV riding in the absence of train inventory. To compensate for this, the agency should consider designation trail data provided during the planning process. Once the travel plan is implemented, BLM should practice adaptive management by testing mitigation	See response to comment 122-46

				techniques such as visitor education, signage, trail maintenance, and/or rerouting before prohibiting access. Further, the agency should prioritize the development of new bicycle, motorcycle, and ATV trails, with preferences to SRMAs, and especially to the appropriate focus areas. Trail expansion would avoid pitting recreationists against one another on a rigid system of roads. By the same token, wide wash bottoms should remain open to all vehicles, instead of unduly restucting them to smaller vehicles.	
Adam	Faleck	216	6	Designating campsites should be done with public participation. Camping should not be confined to one mass site for any given. Most public-land users prefer dispersed camping. The Ruby Ranch Road and Utah Rims should provide a dozen sites	Public participation has been solicited throughout the land use planning process. Camping is not limited to one mass site in any of the alternatives to the DRMP/EIS. See response to comments 123-8 regarding dispersed and designated camping. Dispersed camping is allowed on over 95% of the Moab planning area.
Adam	Faleck	216	7	In areas where camping is not restricted to designated sites, the travel plan should be adjusted to access campsites	See response to comments 120-86 regarding access to dispersed campsites. One of the express purposes of leaving a route open for travel was to provide access to a campsite. If roads to specific dispersed campsites have been omitted in the Travel Plan, they may be added at a future date through site-specific NEPA analysis.
Adam	Faleck	216	8	The Moab Extensive Recreation Management Area should provide primitive roads, singletrack trails, and dry washes to connect SRMAs and towns. Such routes offer opportunities for long-distance tours, which are increasingly popular amount motorized and mechanized enthusiasts. Additionally, such links boost rural economies and disperse use, thereby alleviating conflicts	See response to comment 122-49 and 123-45 regarding the ERMA.The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).
Adam	Faleck	216	9	In the ERMA, Thompson Trail is unique by virtue of its sheer length and remoteness. Trail adoption by volunteers could preserve its singletrack character. Together with Thompson Wash and Copper Ridge Motorcycle Loop, Thompson Trail	See response to comment 122-29

				creates a unique route from Sovereign Trail to Colorado. The Green River Gap and Browns Wash tie Colorado to the town of Green River. These singletracks should be preserved along with adjacent doubletracks. Together such remote, rugged routes offer a chance to experience the desert like neither SRMAs nor graded roads can do.	
Adam	Faleck	216	10	Likewise, Kokopelli's Trail could be enhanced to create higher quality opportunities for motorized and non-motorized travel. The RMP should pledge to construct a Kokopelli Singletrack and mark a Kokopelli Doubletrack that would roughly parallel one another. Through Utah Rims, the Singletrack should be open to motorcycles. Through Yellowjacket, the Singletrack should actually be ATV trail. Everywhere else, the Singletrack should be non-motorized. The Doubletrack would generally follow the current trail, with revisions to achieve a rugged, backcountry opportunity.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Adam	Faleck	216	11	Northeast of Green River, the non-WSA alnds surrounding Tusher Canyon have great potential for mountain bike trails. This northwest corner of the Bookcliffs has access roads, rims with sweeping views including Desolation Canyon, and relatively good soil development. Similar to bicycle trails in Fruita, a Tusher Canyon trail systerm would boost the economy of Green River and dedicate quality trails for mountain biking.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Adam	Faleck	216	12	I generally support establishment of Labyrinth Rims SRMA in Alternative C. However, the Dee Pass Motorized Trail focus area should be expanded beyond Alternative D eastward to the powerlines. The White Wash Sand Dunes OHV Open Area should be expanded by two square-miles beyond Alternative D (northward to Ruby	See response to comment 123-35 relating to enlarging White Wash Sand Dunes open area in Alt C of the Travel Plan for the DRMP/EIS. See comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes. Commenter's suggestions regarding additional trail designations are noted. The DRMP/EIS specifically allows for routes to be

				Ranch Road and southward toward Red Wash road). Fee programs should be determined with public involvement through a Resource Advisory Council. Approximately twenty-five miles of the surrounding OHB trails are popular among ATV riders, and should be designated as such. The Dead Cow Loop could be designated with the exception of the "low-water" alternate, to reduce riparian impacts. The Tenmile Point area from Dripping spring to Levi Well has relatively few routes and could be designated for non-mechanized focus. Tenmile Wash should be designated without speed limits, since speed has little influence on biopysical impacts of travel.	added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). See also response to comment 120-30.
Adam	Faleck	216	13	The southwest corner of Labyrinth Rims is a relatively primitive area, and should be managed to preserve this quality. Spring Canyon, Hellroaring Canyon, Spring Canyon Point, Deadman Point, and south Horsethief Point are best allocated as a non-mechanized focus. Motorized use there can be adequately accommodated by the Jeep Safari routes, plus a few choice spurs to overlooks. Closing the river road downstream from spring Canyon would reduce recreation conflicts, while retaining access to Hey Joe Mine. Dubinky Was is valuable for all vehicle use, and the singletrack near Jug Rock should remain available for motorcycles	See response to comment 122-46
Adam	Faleck	216	14	North of Highway 313, the singletrack which drops off Hidden Canyon Rims is a key link for motorcyclists and bicyclists, alike. The Mill Canyon-Sevenmile Rim mountain bike area should be rotated to become Mill Canyon-Tusher Rims. Tusher has better bicycling potential then Sevenmile due to less sand, more slickrock, and fewer roads. Then Sevenmile-Upper Courthouse motorized backcountry touring area could be	See response to comment 122-46

				created to recognize the high-value roads that extend through Monitor & Merrimac to Big Mesa campground. Upper Sevemile Equestrian Area should be expanded by four square-miles to include some terrain above the rim	
Adam	Faleck	216	15	South of Highway 313, an additional focus area west of south Fork Sevenmile Canyon could provide cross-country and vehicle-assisted rides from the upper Gemini trailhead down to the switchbacks on Highway 313. The Gemini Bridges motorized backcountry touring area could be shifted to include all of Little Canyon Rim. The spur to Gemini Bridges should remain open to allow the unique experience of driving the bridge. Mountain bike alternates to the roads cold be developed in this area, as proposed by Trail Mix. The Goldbar hiking area could be expanded further up Day Canyon, while only closing one spur road.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Adam	Faleck	216	16	The Klondike Mountain Bike focus area is a great foundation to develop mechanized singletrack. Most spur roads could be closed east of Bar M and Sovereign Trail areas. Still, the Sovereign ATV Loops should be permitted in its current location. Spur roads should also be closed north of the Copper Ridge Sauropod Trackway. Copper Ridge Motorcycle Loop is highly valuable to motorcyclists. Trail adoption could help to ensure enjoyment for mountain bikers, like the Sovereign Trail. And like the Sovereign ATV Loop, the Copper Ridge Motorcycle Loop could actually protect any non-mechanized trails that it surrounds by steering motorcyclists toward a legal alternative	See response to comment 122-46
Adam	Faleck	216	17	Yellow Cat, Yellow Jacket, and Dome Plateau are worthy of SRMA designation. Yellow Cat and Yellow Jacket are densely roaded and increasingly popular amount four-wheeled visitors, so they	See response to comment 122-38

				should have a motorized backcountry touring focus. Few adjustments are needed to the travel plan, except around Owl Canyon where road access should be preserved. A non-mechanized focus area could buffer the entire boundary of Arches National Park, wrap around Dome Plateau, and terminate near Dewey Bridge. Only a couple overlooks of Lost Spring Canyon and Dome Plateau are needed, but they should remain open all the way to the rim.	
Adam	Faleck	216	18	Utah Rims SRMA ought to extend further southwest to the Cisco Road. From the Cisco Road to Cottonwood Wash, a mountain bike focus could lay the groundwork for bicycle trails. From Cottonwood Wash to the Westwater Road, a motorcycle focus would help preserve Guy's Trail and associated singletracks. From Westwater Road to the state line, several existing singletracks should be recognized in the travel plan, plus one ATV loop in the northeast corner of May Flat. A non-mechanized focus area could be expanded from the Westwater WSA further southwest all the water to private property. The entire spur road to Big Hold could be closed to enhance primitive characteristics. Non the less, the Westwater Canyon overlook road should not be closed. Mechanized visitors should be granted at least one viewpoint of the place that their activities are prohibited from.	See response to comment 122-39
Adam	Faleck	216	19	The Dolores Triangle includes a few remote areas where primitive character should be preserved. By closing two less-valuable spurs, Big Triangle substantially expands the Westwater roadless area to the north. Further south toward Buckhorn Draw, a few roads could be added to ensure that quality motorized opportunities exist in the Dolores Triangle as well. From Steamboat Mesa to South	See response to comment 122-40 regarding routes in the Dolores Triangle.

				Beaver Mesa, another focus area should be designated for primitive recreation. Half of the Dolores River overlooks could be preserved as cherry stems. Also, a road on the southeast ridge of the South Beaver Mesa lies outside of this focus area, and should remain open	
Adam	Faleck	216	20	The Sand Flats Road traditionally connected trails such as Hells Revenge, Slickrock, and Fins 'N Things. Paving the road, and prohibiting OHVs from pavement, has fragmented the trail system. Thus OHVs should be permitted to use Sand Flats from Hells Revenge exit to the end of the pavement. The new, reduced speed limit of 25 mph should be preserved. A non-motorized lane should be constructed to parallel the road and reduce congestion. Additionally, the 1/4-mile slickrock route connecting Slickrock Trail with Fins 'N Things should be designated for two-wheeled use to alleviate traffic along the main road. All of these measure would make Sand Flats more user-friendly and manageable, without further impacts to the environment.	See response to comment 122-42
Adam	Faleck	216	21	Special policies should continue permitting slickrock exploration. The Moab Field Office Off-Highway Vehicle Travel Map states that "Two-wheel motorcycles are allowed on established slickrock riding areas in the slickrock Trail, Bartlett Wash and Tusher Canyon areas and on slickrock areas along the Monitor and Merrimac and Lower Monitor and Merrimac trails where such use does north further disturb vegetation or soils" (dated March 8, 2001 as part of emergency resections) In these areas, travel could be further restricted, but not so drastically as the draft RMP intends. Mechanized travel should still be allowed on any barren rock surface. Slickrock within one hundred yards of designated route could remain open to	See response to comment 122-42

				motorized travel, except for Tusher slickrock, which would be reserved for non-motorized use. This two-hundred yard corridor would accommodate the ways that people currently enjoy slickrock areas	
Adam	Faleck	216	22	The Black Ridge area presents many potential recreation opportunities nearby Moab. The South Spanish Valley Mountain bike area could be extended to include part of Pole Canyon. This augments the variety of terrain, and provides enough room for a full-days's ride. Sweeping travel restrictions associated with the draft RMP warrant designating an area for specialized sports which depend on unrestricted areas. Durable and irregular terrain that is suitable for motorcycle and bicycle trails riding exists in Pole Canyon for the powerlines to Area BFE. In the same vein, a rock crawling area could be established on black Ridge east of the powerlines. This area is littered with old mine roads, and is currently open to cross-country travel. The site could be limited to designated rock crawling routes, and adopted by local clubs. West of the powerline, the north flank of Black Ridge could be designated for equestrian use, and the backdrop to a residential area. The south flank could be a bicycle freeride area, since it provides one thousand feet of vertical relief, and graded roads for shuttling. Kane Creek is a dry wash from Highway 191 up to the Black Ridge Road. It should be open for OHVs to create a loop with Behind-The-Rocks while avoiding the highway	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Adam	Faleck	216	23	Hatch Wash backpacking focus area could be expanded for better backpacking. Alternative C proposes to designate roughly twenty spur roads to the rim of Hatch Wash. However, only five are necessary to view most stretches of the Canyon	See response to comment 122-45. The backpacking opportunities in Hatch Wash are below the rim. There are no backpacking opportunities on top of the canyon.
Adam	Faleck	216	24	Cameo Cliffs SRMA should also be expanded for	When the Cameo Cliffs SRMA was created, the areas to

				better OHV riding. The current boundary offers a meager half-day for the skilled rider. Extending the SRMA east to Big Indian Valley could still avoid mining activity. Shifting the boundary north o the Browns Hole Road could still skirt the nearby residential area	the east were specifically excluded due to mining hazards. Although travel on routes outside the SRMA is available consistent with the Travel Plan, the designation of the area as an SRMA would encourage the public to this hazardous area.
Jan Ellen	Burton	257	1	The entire Green River is suitable for Wild and Scenic Designation. The entire river corridor supports a diversity of habitat and wildlife, from its headwaters in CO to the Town of Green River and is an outstandign value for Utah.	See response to comment 124-88.
Joan	Gough	258	1	The real issue is inadequate notification and enforcement. Roads such as Poison Spider and Gold Bar keep getting pushed further and further into the trackless areas. There are spurs off Gold Bar trail that are just for the sake of seeing where ATVs, jeeps, motorcycles and bicycles can do. These spurs needs to be blocked off where possible and we need people on the ground enforcing the plans. With out enforcement, the whole plan in an exercise in futility	See response to comment 122-18
Michael	McPhail	259	1	The Green from Labyrynth Canyon to the confluence should be enjoyed without the distrubance of motors.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Steve	Kobak	260	1	Please consider an alternatate plan that will not impact the river user so negatively at Ten Mile and Spring Canyons.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Sandra	Freethey	261	1	I would like to see Gemini Bridges remain open to motorized users after blocking off all extranous	See response to comment 206-14

				roues into the birdges. The historic use of the are ais important but has been abused. I urge you to keep it open, while working with the community to repair damage and begin controlled use of the area.	
Chris	Benson	262	1	There are areas that should not be devastated due to an increase or introduction of OHVs. We do not know what the effects would be because there is no assessment process going on! How can you uunderstand the effect this plan will have? For example, what would the effects be on riparian corridors (Green River, Ten Mile, White Wash, etc)?	See response to comment 124-11
Chris	Benson	262	2	Also important is the proximity of some of the proposed routes to Archaeological areas/sites. How has the RMP assessed and accounted for these areas? The plan has dramatically failed to be both thorough as well as legal. Is it not imperative to incorporate existing laws into this plan like NEPA, as well as the Antiquities Act?	Travel Plan formulation is described in Appendix G. In accordance with the BLM Land Use Planning Handbook (1601.1), a Class I cultural survey was conducted. Each of the 33,000 routes was evaluated for its possible impacts to cultural resource, using Class I inventory methods. Many routes were deleted from Travel Plan alternatives due to conflicts with cultural resources. A full cultural inventory is not required for a land use plan. Washington Office Instruction Memorandum 2007-030 states that a Class III inventory is not required for the designation of existing routes. Furthermore, FLPMA states that in the development and revision of land use plans the BLM should rely on the inventory of the public lands, their resources, and other values, to the extent such information is available. Under Management Common to All Action Alternatives (page 2-7), Cultural Class III inventories would be required for all new roads and trails. All land disturbing activities within Traditional Cultural Properties would be designed to avoid or minimize impacts, where reasonable. Proposed projects or actions would be modified to avoid the area or site, avoid time of use by Native American Groups, or would be eliminated altogether. See also response to the submission by the Colorado Plateau Archaeological

					Alliance.
Chris	Benson	262	3	Please extend the comment period, so we have time to comment.	See response to comment 124-1
Dawna	Dinkins	265	1	It is my understanding that you are in the process of formulating the new Moab RMP that will affect our town. The plan may not have totally considered (or at least doesn't mention) the benefits of ongoing energy extraction to our economy and how future access to minerals will be important in keeping our economy moving in the right direction. I believe the RMP is required by law to consider those effects even though Green River isn't in the boundaries of he Moab RMP. Decisions reached in the RMP will have big impacts on Green River's economy.	As described in Chapter 4, the BLM does not expect to see significant oil and gas development in the Moab planning area over the life of the plan, and therefore does not expect major socioeconomic benefits or costs from these activities. The BLM summarizes the minor costs and benefits associated with oil and gas development on local communities in Chapter 4, p. 260-264. The impacts such activities have had in other parts of the West is unlikely to apply to the MPA.
Scott	Foster	266	1	Protect areas like Beaver Creek, Behind-the-Rocks, Desolation Canyon, Fisher Towers, Goldbar, Granite Creek, Hatch Wash, Hunter Canyon, Mary Jane Canyon, Shafer Canyon, Westwater Canyon, Coyote Wash from OHV use.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Kevin	Kemp	268	1	Our concern is that we have not seen any estimates of how many campsites are available currently, compared to how many will be available should Alternative C be implemented.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsites closures depends upon site specific conditions
Kevin	Kemp	268	2	There are missing trail segments on Flat Iron Mesa and 3D, and there have been private land issues on Strike Ravine. Our request is that	See response to comment 206-11

				missing segments be included in the final plan, including the segment on Strike, which has been settled in court.	
Tom	Foster	269	1	Management objective that use such things as primitive recreation zones, Areas of Critical Environmental Concern, and so-called “areas with wilderness character to create a de-facto Wilderness management is unlawful. Congress put a deadline on inventory and study for Wilderness.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Tom	Foster	269	2	Your open area at White Wash in Alternative C and D must be expanded. The current proposal is unworkable because it closes the killer hill climb and camping area to the west of the Dunes.	See response to comment 123-35
Tom	Foster	269	3	Requiring fences around the cottonwood trees and “water sources” is both impractical and unnecessary.	See response to comments 208-3 and 479-6.
Tom	Foster	269	4	We look at your maps and can’t tell if the campsites we use are going to be open or closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsite closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Tom	Foster	269	5	The Utah Rims SRMA should extend further southwest to encompass Mel’s Loop and beyond.	See response to comment 122-39.
Tom	Foster	269	6	Yellowcat is increasingly popular for four wheeling and ATV riding. Designating a SRMA there would utilize the dense network of mine roads that already exist.	See response to Comment 122-38
Roger	Foisy	271	1	OHV rights-of-way across STILA properties: Many	See response to comment 120-82

				designated OHV routes cross properties owned by STILA. To avoid having these routes closed in the future by sale of these lands, rights-of-way should be placed in public ownership. Programs and funding are in place to accomplish the goal. This opportunity should be noted in the plan.	
Roger	Foisy	271	2	White Wash Sand Dunes Open OHV area: It should be enlarged. There should be a better mix of sand and slick rock with a logical boundary.	See response to comment See response to comment 123-35
Roger	Foisy	271	3	Requiring fences around the cottonwood trees and “water sources” is both impractical and unnecessary.	See response to comments 208-3 and 479-6.
Roger	Foisy	271	4	Motorcycle: Single Track Routes. In several cases, motorcycle trails shown in Alternatives C and D have been used for several years, and are currently being used, by ATVs and or 4x4s as integral segments of longer loop routes. Most of all these trails have been used by ATVs from the mid 1980s. We feel these routes should be designated as motorized, or ATV/OHM routes, with some as 4x4. When we contacted your office we were told that the ATV community did not ask for any routes. This is not true PLEAA used your TRIMBLE GPS and did this inventory for the Moab Field Office. Putting these routes as motorcycle only on this draft RMP shows a bias and a predetermination of the outcome. The proposed changes in these route designations are shown on the attached maps. Also, the initial inventory and subsequent designation of motorcycle routes was incomplete. Recommended additions are also shown on the attached map.	See response to comment 120-90
Roger	Foisy	271	5	Access to dispersed camping areas: Technically anyone driving off a designated route to access a dispersed camping area would be in violation of the proposed travel plan. Where this type of camping is permitted it may not be feasible to	See response to comments 120-86 regarding access to dispersed campsites. One of the express purposes of leaving a route open for travel was to provide access to a campsite. If roads to specific dispersed campsites have been omitted in the Travel Plan, they may be

				carry all the necessary camping gear to a camp spot. The plan should address this issue so that legitimate camp spots can be accessed on a legal route. The Fishlake National Forest has implemented a program to address this subject, which as been successful.	added at a future date through site-specific NEPA analysis.
Roger	Foisy	271	6	Missing links for loop routes: There are a few additional connected routes needed. Some are double track ATV routes and were probably missed in the field inventory. In other cases, routes were designated as motorcycle routes where ATVs or even full-sized vehicles had been using them to complete loops. These missing links are shown on the attached map along with their vehicle type designation.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Roger	Foisy	271	7	ATV motorcycle routes: There were no ATV/Motorcycle only routes designated in the proposed alternative. This is a useful designation to complete the array of OHV alternatives, especially for routes where use by the larger vehicles is not desired or acceptable.	See response to comment 22-46
Roger	Foisy	271	8	Duma Point Area (excluding the sand dune open area): With few exceptions, there are no designated routes in this area in any of the alternatives and there is no explanation as to why this occurred. We recommend the routes shown on the attached maps be included in Alternative C as the final preferred alternative.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Roger	Foisy	271	10	Alignment of routes with those of other jurisdictions. See attached map for a few suggested changes. This may be difficult to do for motorcycle routes in some areas because inventories are probably not complete. This is particularly critical for the border with Colorado in the Rabbit Valley/Bitter Creek area.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Roger	Foisy	271	11	It is very important that the Final RMP mandate full public involvement in any establishment and	Public participation has been solicited throughout the land use planning process. No areas are closed to

				management of “restricted camping areas” or “controlled camping areas.” We have looked at your maps and can’t tell if the campsites we use are going to be open or closed.	camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsite closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Roger	Foisy	271	12	Yellowcat/The Poison Strip/Dome Plateau is increasingly popular for four wheeling and ATV riding. Designating a SRMA there would utilize the dense network county and of mine roads that already exist.	See response to Comment 122-38
Roger	Foisy	271	13	Page G-11, 7.1 OHV Designation Criteria 2. Wildlife: Does the reference to wildlife habitat include habitat for all species or is it intended to apply to habitat for more significant species or groups of species?	The reference to wildlife habitat is for all species. The BLM acknowledges that there is general wildlife habitat in every acre of the planning area. However, the routes that were examined for wildlife conflicts were where there were specialized areas, such as bighorn sheep lambing and rutting, or sage grouse areas.
Roger	Foisy	271	14	Page G-11, Public Safety: The term “extreme” should be further defined. What is an extreme hazard to one person may not be to another, depending on their riding/driving skills. In some cases these hazards add to the use experience.	The wording on page G-11 is directly from the BLM Manual at 8340. The Moab BLM has no authority to change the wording of BLM Manuals.
Roger	Foisy	271	15	Page G-15, Emergency Limitation or Closure: Perhaps “immediately closed should read, “immediately mitigated or closed” or some similar wording. Some mitigation can be immediately put in place and closure would not be necessary.	Mitigation can be put in place without an emergency limitation or closure. The statement on pg. G-15 is a quote from the federal regulations at 43 CFR 8341.2. The BLM cannot alter the wording of Federal regulations.
Roger	Foisy	271	16	Page G-29, Implementation Process: This section should stress the need for maps and signing. It takes both. Most users cannot use maps as a navigational tool, especially broad scale maps	Map and signage decisions are all administrative actions and do not require land use planning decisions. These suggestions will be considered during implementation of the Travel Plan after the land use plan is completed.

				without sufficient detail to allow accurate location of designated routes. All designated routes should have a number or some other identifying symbol or name that corresponds to the number, name or symbol on the map. These same identifiers should correspond to what is shown on route signage. With good signs and good maps, it is reasonable to expect users to stay on the designated routes. Until these aids are in place, law enforcement personnel and users will be equally frustrated.	
Roger	Foisy	271	17	Management objectives that use such things as primitive recreation zones, Areas of Critical Environmental Concern, and so-called “areas with wilderness character” to create a de-facto wilderness management is unlawful. Congress put a deadline on inventory and study for wilderness.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Charles E.	Gilliam	272	1	All roads, jeep roads/trails, OHV double track trails and single track trails in the Moab BLM management area, I would like to remain open.	See response to comment 122-46
Charles E.	Gilliam	272	2	Jeep and ATV roads and trails out of Rabbit Valley on the Utah side of the state line. The Kokopelli trails is just one of these route's. Please keep this area open for all to enjoy. *See attached map.	See response to comment 206-11
Charles E.	Gilliam	272	3	There is a road going into Granite Creek (close to the Colorado State line) that accesses an old homestead. Please keep this area open to ATV/Dirt Bike, Jeeps, and other OHV enthusiasts. *See attached map.	See response to comment 206-11
Jerry	Karnopp	273	1	We oppose any fee systems and the closing of Gemini Bridges.	See response to comment 123-10 regarding fee systems. Commentor’s opposition to closing Gemini Bridges noted.
Greta	Engholm	274	1	Gemini Bridges, Mill Canyon, Courthouse Wash, Tenmile Canyon, Island Mesa Trail, Rail Mesa open for OHV.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring

					and site specific NEPA analysis.
Daniel	Stoy	275		Please expand the White Wash area and establish one at Sand Flats.	See response to comment 123-35
Daniel	Stoy	275		Connect Thompson trail with copper ridge motorcycle trail.	See response to comment 122-29
Daniel	Stoy	275		I support Ride with Respect's recommendations that open travel would not be allowed 100 yards from a designated trail on slick rock.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Daniel	Stoy	275		The Hillclimb and camping areas in the west side of the White Wash Dunes need to be included as they are, or expanded, not reduced.	See response to comment 123-35
Daniel	Stoy	275		URSMA should include Mel's Loop and the surrounding southwest area.	See response to comment 122-39.
Daniel	Stoy	275		The Yellowcat area has an excellent network of old mining roads to explore. Please designate an SRMA to manage Yellowcat.	See response to comment 122-38
Daniel	Stoy	275		The Gemini Bridge Crossing is a highlight of my tour. Please keep it open.	See response to comment 206-14
Daniel	Stoy	275		Keep 10 mile wash and surrounding motorcycle trails open.	See response to comment 211-20
LaDawn	Sorensen	276		The Utah Rims SRMA should extend further southwest to encompass Mel's Loop and beyond.	See response to comment 122-39.
LaDawn	Sorensen	276		Yellowcat is increasingly popular for four wheeling and ATV riding. Designating a SRMA there would utilize the network of mining roads that already exist.	See response to Comment 122-38
LaDawn	Sorensen	276		Keep the last bit of Gemini Bridges open. Please Keep the Thompson Trail and Copper Ridge loop as proposed by Ride with Respect. Then Mile Wash has been a popular OHV route for several decades. Popular washes that have had vehicle use for years should remain open!	See response to comment 206-14

LaDawn	Sorensen	276		Management objectives that use such things as primitive recreation zones, area of critical environmental concern, and “areas with wilderness character” to create de-facto Wilderness management is unlawful. Congress put a deadline on inventory and study for Wilderness.	See response to comments 120-8, 121-10, 121-58, and 121-61.
LaDawn	Sorensen	276		Requiring fences around the cottonwood trees and water sources is both impractical and unnecessary.	See response to comments 208-3 and 479-6.
LaDawn	Sorensen	276		The plan for open area at White Wash in Alt C and D needs to be expanded.	See response to comment 123-35
Dale	Grange	277	1	The RMP DEIS should have a recreation-emphasis alternative and the travel plan should have a pro-access guidance as well.	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.
Dale	Grange	277	2	The fencing proposal for the cottonwood trees and water sources are a waste of time and effort and are completely impractical.	See response to comments 208-3 and 479-6.
Dale	Grange	277	3	The routes included for designation are not inclusive of the routes that are “on the ground.” This would be particularly true for some ATV and more single-track motorcycle routes. Local groups that have provided maps of these routes should be commended for their efforts and these routes added to the travel plan inventory. Also, provisions for the addition of routes to the final travel plan should be included in the final RMP.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Dale	Grange	277	4	“Lands with wilderness Character.” This issues should have been dropped from BLM planning in 1991!	See response to comments 120-8, 121-10, 121-58, and 121-61.
Ronald	Linton	278	1	Management objectives that use primitive recreation zones, Areas of Critical Environmental Concern, and so-called “areas with wilderness character” to create a de-facto wilderness	See response to comments 120-8, 121-10, 121-58, and 121-61.

				management is unlawful.	
Ronald	Linton	278	2	We can't tell by your maps if the campsites we use are open or closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Ronald	Linton	278	3	Requiring fences around the cottonwood trees and "water sources" is both impractical and unnecessary. We oppose this provision of the Draft Plan.	See response to comments 208-3 and 479-6.
Ronald	Linton	278	4	Some of the motorcycle trails are really ATV trails.	See response to comment 120-90
Ronald	Linton	278	5	Yellowcat is very popular for four wheeling and ATV riding. Designating a SRMA there would utilize the network of roads that already exist.	See response to Comment 122-38
Steven	Dozier	279	1	Management objectives that use primitive recreation zones, Areas of Critical Environmental Concern, and so-called "areas with wilderness character" to create a de-facto wilderness management is unlawful. Congress put a deadline on inventory for Wilderness.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Steven	Dozier	279	2	Your open area at White Wash in Alt C and D must be expanded.	See response to comment 123-35
Steven	Dozier	279	3	I can't tell by your maps if the campsites we use are open or closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural

					resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
James	Widdison	280	1	Some of the trails are not complete on the maps.	See response to comment 206-11
Sue	Phillips	281	1	I found the statement that soils in the area have low to moderate wind erodibilty in the Draft RMP (Chpt 4, Fugitive Dust [Page 4-23]). I believe that very good data from the local USGS (see work by Jayne Belnap et al.) shows that although this may be the case for undisturbed soils, many of these soils are highly erosive from the time they are disturbed until they are rained on, a time period that could last months in this region. Not only is good data available to show this SSURGO data is flawed and/or not applicable to disturbed soils.	The statement referenced by the commentor on low to moderate wind erodibility of soils in the MPA is found on page 4-23 of the DRMP/DEIS. Although the first sentence in the Fugitive Dust paragraph on p. 4-23 generalized the soils as having low to moderate wind-erodibility rating. However, the remainder of the paragraph acknowledges that the MPA has high wind erodibility ratings on some of the soils. SSURGO data is the best available data regarding soils for the planning area. This is the recommended data set from the NRCS, the agency with jurisdictional responsibility for soils. The BLM referenced all published Belnap studies. Any studies as yet unpublished have not been referenced in this DRMP/EIS. See also the soils nad watershed section of the DRMP/EIS (Section 4.3.13.7) which discusses the effects of travel management, and other disturbances, on the erodibility of soils.
Shane	Tangren	282	1	Alt C and D for the White Wash area is too small and must be expanded, the dunes should be open for all to enjoy.	See response to comment 123-35
Shane	Tangren	282	2	Fencing around the cottonwoods and water is impractical; the draft plan should be abandoned.	See response to comments 208-3 and 479-6.
Shane	Tangren	282	3	I am opposed to the fee system in alternatives C and D the final RMP should not require fees.	See response to comment 123-10.
Shane	Tangren	282	4	The Utah Rims SRMA is a popular area to locals and tourists and should be extended to the southwest.	See response to comment 122-39.
Shane	Tangren	282	5	Yellowcat area is and has been a place that is and	See response to Comment 122-38

				has been used by everyone for years. Designating a SRMA there would utilize the old mining roads.	
Shane	Tangren	282	6	Some of the “motorcycle trails” are actually ATV trails.	See response to comment 120-90
Christopher	Lish	284		Please protect places like Fisher Towers, Goldbar Rim, Labyrinth Canyon, and the viewsheds of Arches and Canyonlands National Parks from oil and gas development and excessive ORV use.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Christopher	Lish	284		Federal law requires the BLM to give priority to the protection of lands which qualify as “Areas of Critical Environmental Concern” (ACEC) because of scenic, cultural, or ecological importance. However, the BLM plan would fail to protect 90% of the 613,077 acres which qualify for ACEC designation.	See response to comment 124-68 regarding ACEC designations.
Christopher	Lish	284		The BLM is making it as onerous as possible for the public to participate in this and other land use plans. The BLM should to extend the public comment deadlines by at least another 180 days to allow for meaningful comment for each of the upcoming land use plans. It is a reasonable extension to provide the public a real chance to comment on the future of over 11 million acres of public land.	See response to comment 124-1
Christopher	Lish	284		The BLM has done no site-specific studies to determine the impact of these routes on Native American cultural sites or other natural resources like riparian areas or wildlife habitat. Science to back up the ORV route designations does not exist.	See response to comment 123-12
Jane	Butter	285	1	I am asking for an extension of the comment period. 90 days is simply not enough time to sift through this thick and confusing document to determine its effects on the land.	See response to comment 124-1

Jane	Butter	285	2	The Fisher Towers area, as well as Labyrinth Canyon are destinations where I believe ORV traffic should be aggressively eliminated.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Rick	Berhrmann	290	1	The Congressional mandate to manage BLM land pursuant to the Multiple Use/Sustained Yield paradigm described in law. Congress put a deadline on inventory and study for Wilderness and the BLM should no longer be allowed to manage solely for “wilderness character.”	See response to comments 120-8, 121-10, 121-58, and 121-61.
Rick	Berhrmann	290	2	There is not much difference that I can see in the three alternatives formulated by the BLM that would allow limited or no motorized access. Is the BLM exempt from the ADA passed by congress?	The ADA accessibility guidelines do not specify or quantify the type or degree of access that must be allowed on public lands. The ADA does not require that all public lands be vehicle accessible. In addition, designated recreational motorized routes are an administrative decision and not subject to ADA. However, the ADA accessibility guidelines will be use in construction of any Federal facilities on public lands.
Rick	Berhrmann	290	3	Some of the motorcycle trails in the BLM Moab Travel Plan are very popular with ATV users.	See response to comment 120-90
Rick	Berhrmann	290	4	The FEIS should consider opening more ATV trails especially between White Wash and Red Wash. I encourage you to take another look at the proposeal developed by Ride with Respect.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Rick	Berhrmann	290	5	Building fences around cottonwood trees and water sources is unnecessary and impractical.	See response to comments 208-3 and 479-6.
Rick	Berhrmann	290	6	Please keep the following routes open: The last stretch of the Gemini Bridges road. The Thompson Trail and the Copper Ridge loop as proposed by Ride with Respect. Ten Mile Wash and other popular washes that	See response to comment 206-14

				have had vehicle use for years should remain open.	
George	Alderson	291	1	We believe this [2,642 mile] network exceeds BLM's ability to enforce regulations keeping vehicles on the designated routes.	See response to comment 122-18
George	Alderson	291	2	Hatch Point and Canyon Rims: This area is remote, with few signs of human activities except a primitive ORV road and ATV tracks we saw about a mile off that road. This segment of Canyon Rims is wild but easily accessible for hiking and other quiet forms of recreation. It is just off the Needles/Anticline Overlooks Road and near the Windwhistle Campground. Excluding ORVs will greatly benefit quiet recreation uses and secure critical wildlife habitat for desert bighorn sheep and pronghorn.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
George	Alderson	291	3	Hatch Canyon: A tributary of Kane Springs Canyon, Hatch Canyon is remote, but close to Highway 191 and Needles/Anticline Overlooks Road. It should be protected from ORVs and oil/gas leasing.	Under Alternative C of the DRMP/EIS, Hatch Wash is proposed as a backpacking focus area, and no new motorized routes could be proposed for this area. There are no routes within the wash. There is a controlled surface use stipulation on all riparian and floodplain areas for oil and gas leasing.
George	Alderson	291	4	White Wash Sand Dunes: We urge BLM to proceed with an expanded ACEC, as the boundaries in Alternative B (map 2-14-B) leave much of the complex exposed to continued ORV traffic. Please bar ORVs from the entire dune complex, water sources, cottonwoods, and associated desert bighorn sheep habitat ecological values of the dune complex.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
George	Alderson	291	5	We urge closure to ORVs and mineral leasing of the following, plus their designation as ACECs: Green River corridor; also recommend it for Wild and Scenic River status Mesas by Labyrinth Canyon: Deadman Point, Horsetheif Point, Mineral Point, Spring Canyon Point, and Tenmile Point	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				Side canyons: Tenmile Canyon, White Wash, Hell Roaring Canyon	
George	Alderson	291	6	We urge the BLM to establish wider buffer zones around park [Canyonlands and Arches] boundaries and along SR 313.	See response to comment 980-1. The 'buffer zones" that have been established are considered sufficient to protect the resources in question. The commentor provides no data to indicate why wider zones are needed.
George	Alderson	291	7	We urge the BLM to establish wider buffer zones around park [Canyonlands and Arches] boundaries and along SR 313.	The BLM has worked with the National Park Service to establish controlled surface use stipulations to protect the major viewsheds of the parks. In addition, a controlled surface use stipulation has been placed along the entire length of Utah Highway 313 to protect the visual resources along this State Scenic Byway. These protections are found in Alt C of the DRMP/EIS.
George	Alderson	291	8	The tract around the Deadhorse Point road should receive protection. The ACEC proposed in map 2-14-B (“Highway 279 Corridor/Shafer Basin/Long Canyon”), with a ban on oil/gas leasing and ORVs.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
George	Alderson	291	9	The tract around the Deadhorse Point road should receive protection. The ACEC proposed in map 2-14-B (“Highway 279 Corridor/Shafer Basin/Long Canyon”), with a ban on oil/gas leasing and ORVs.	The ACEC mentioned by the commentor is proposed in the preferred alternative. Oil and gas leasing would be managed with a no surface occupancy stipulation, and motorized vehicles would be restricted to designated routes. In addition, Highway 313, the entry road to Dead Horse Point, is protected with a controlled surface use stipulation to protect the scenic values of this State scenic byway.
W.W.	Robinson	292	1	It's not just the OHV traffic you must factor into the equation. There is also the increasing numbers of super-sized trucks hauling huge trailer loads of off-road machines with dirty-burning engines from all across the region. Encouraging this action would make no contribution at all to downsizing the	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring

				state's carbon footprint. Please reconsider your plan to expand off-road travel routes and limit this to the generous miles of existing roads.	and site specific NEPA analysis.
Edwin D.	Hawkins	293	1	Management objectives that use primitive recreation zones, Areas of Critical Environmental Concern, and so-called “areas with wilderness character” to create a de-facto wilderness management is unlawful. Congress put a deadline on inventory for Wilderness.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Edwin D.	Hawkins	293	2	Requiring fences around the cottonwood trees and “water sources” is both impractical and unnecessary. We oppose this provision of the Draft Plan.	See response to comments 208-3 and 479-6.
Edwin D.	Hawkins	293	3	Some of the motorcycle trails are really ATV trails.	See response to comment 120-90
Edwin D.	Hawkins	293	4	We believe there should be more ATV trails designated, especially between White Wash and Red Wash. It seems to us that the proposal by Ride with Respect should be carefully considered.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Edwin D.	Hawkins	293	5	Please keep the last bit of Gemini Bridges road open.	See response to comment 206-14
Edwin D.	Hawkins	293	6	We agree with Ride with Respects proposal to keep the Copper Ridge loop and the Thompson trail open. Many washes that have been open to vehicle traffic for many years are being proposed for closure. We believe that Ten Mile Wash should remain open, as should others.	See response to comment 122-29
Mark G	Niederhauser	294	1	I can’t tell from your maps if the campsites we use are going to be open or closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for

					adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Mark G	Niederhauser	294	2	Some of the motorcycle trails are actually ATV trails.	See response to comment 120-90
Mark G	Niederhauser	294	3	Management objectives that use primitive recreation zones, Areas of Critical Environmental Concern, and so-called “areas with wilderness character” to create a de-facto wilderness management is unlawful. Congress put a deadline on inventory for Wilderness.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Mark G	Niederhauser	294	4	Requiring fences around the cottonwood trees and “water sources” is both impractical and unnecessary. We oppose this provision of the Draft Plan.	See response to comments 208-3 and 479-6.
Mark G	Niederhauser	294	5	I would like to see the last bit of Gemini Bridges road remain open. This is one of a few that can be driven across and has been a thrill and available for decades. Also the Thompson trail and the Copper Ridge Loop as proposed by Ride with Respect. I would also like to see the Ten Mile Wash and many other riparian washes as being proposed for closure left open.	See response to comment 206-14
Kurt	Nosack	295	1	Keep open Moab Rim, Poison Spider Mesa, Fins ‘n Things, Metal Masher, Porcupine Rim, Kane Creek, Elephant Hill, Lockhart Basin, Hole in the Rock Trail.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Kurt	Nosack	295	2	I looked at your maps and cannot tell if my favorite camping spots are open or closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to

					designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Kurt	Nosack	295	3	Requiring fences around the cottonwood trees and “water sources” is impractical and unnecessary.	See response to comments 208-3 and 479-6.
Kurt	Nosack	295	4	We feel the Utah Rims SRMA is necessary to properly manage this popular recreation area. It must have motorized and mountain bike focus and include a process whereby new routes can be designated or constructed as is deemed necessary. It also needs to be extended to include the Mel’s Loop area and beyond.	See response to comment 122-39. The DRMP/EIS specifically allows for routeThe DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). s to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).
David	Farnsworth	297	1	Because the US has a national policy of encouraging the development of its native resources, the BLM is required to remove impediments to domestic oil and gas development.	See response to comments 203-46 and 210-2.
Tracey	Farnsworth	298	1	The acreage available to oil and gas leasing has been reduced from just over 1 million acres to a little over 400,000 acres - a 60% reduction. The DRMP identifies 14 Areas of Critical Environmental Concern. 12 of these contain current leases (which of course will remain valid until they expire). These recommendations do not seem to follow the directive that the BLM encourage as much development as possible on federal lands.	The acreage open for oil and gas leasing in the preferred alternative is 1,451,124 acres, of which 217,480 acres are open to oil and gas leasing subject to a no surface occupancy stipulation. About 806,994 acres are open to oil and gas leasing subject to controlled surface use and timing limitation stipulations. About 353,000 acres are within Wilderness Study Areas and are closed to oil and gas leasing by policy. About 25,306 acres are closed to oil and gas leasing because it is not reasonable to apply an NSO stipulation. Although 14 Areas of Critical Environmental Concern are proposed in Alt B, 5 of them, totaling 63,000 acres, are

					carried forward to Alt C, the preferred alternative. The BLM has proposed the least restrictive stipulations necessary to protect the resource values identified for these areas. See response to comments 203-46, 210-2 and 214-9. See response to comment 124-96 and 121-15 regarding oil and gas development potential in the MPA.
Dan	Harris	299	1	I am writing to compel you to follow the Energy Policy Act and remove as many roadblocks to energy development on BLM land as you can. The RMP, as written, contains too many limitations on energy development.	See response to comments 214-9, 210-2 and 203-46.
Dan	Harris	299	2	The analysis states that Alternative B, which is the most restrictive, will have only slightly lower economic benefits than Alt C and D (which contain more energy development). That may be true for Moab, itself, but certainly not communities like Green River. I believe the analysis is severely flawed - it defies common sense.	Under the Reasonably Foreseeable Development (RFD) scenario for oil and gas projects relatively few wells would be drilled and would employ relatively few people. The BLM's analysis is based on the RFD. On pg. 4-264 of the Draft RMP/EIS it is stated that employment related to oil and gas development would be less under Alt B. Alternative B projects 264 wells over the life of the plan; Alt. C projects 432 wells over the life of the plan. The economic returns from 264 wells are compared with the economic returns from 432 wells. The economic returns from 432 wells are greater than those from 264 wells. The effects on employment and wages have been added to Chapter 4 of the PRMP/EIS. Although Green River is outside the planning area, the fact that planning area decisions affect neighboring towns has been added to Chapter 3.
Doug	Leman	300	1	The Congressional deadline on inventory and study for "wilderness" must be acknowledged as unacceptable and unlawful. The BLM cannot and should not manage for "wilderness" character" to create more de-facto "wilderness areas."	See response to comments 120-8, 121-10, 121-58, and 121-61.
Doug	Leman	300	2	"Open areas" in alternatives C and D must be expanded and should be designated along easily	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under

				identifiable geographical features and formations or preferable along boundary roads like the Ruby Ranch Road on the west, the Blue Hills Road on the North, and the Duma Point/Ruby Ranch (back way) on the east.	Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Doug	Leman	300	3	Please keep the following routes open: The last portion of the Gemini Bridges Road The Thompson Trail and Copper Ridge loop, as proposed by Ride With Respect The Ten Mile Wash OHV route – including washes that have been open to vehicle use for many years now.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Jeff	Turner	301	1	Integral parts of the following Jeep Safari Trails added to the inventory of designated routes in Map 2-11-C: Strike Ravine Trail, 3-D Jeep Trail, Flat Iron Mesa Trail. I have included maps with GPS tracks of the routes for these existing trails, shown in red. Please add the missing trail segments to the designated route inventory on Map 2-11-C. *See attached maps.	See response to comment 206-11
Robert J	Telepak	303	1	Keep me as an active participant in this process and on your active mailing list/notification list.	NRR
Robert J	Telepak	303	2	I believe that it is illegal to try to create a de-facto Wilderness by some of the management policies you propose to use: Only congress, not he BLM, can make Wilderness or National Parks. Yet the overly restrictive use of management tools such as primitive recreation zones, ACECs, and “areas with wilderness character” have the practical on-the-ground effect of making de-facto Wilderness in some areas, or expanding the territory of Arches and Canyonlands National Parks.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Robert J	Telepak	303	3	There must be full public involvement in any establishment and management of “restricted camping areas” or “controlled camping areas.”	Public participation has been solicited throughout the land use planning process; however the process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. See response to

					comments 123-8 regarding dispersed and designated camping. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2.
Robert J	Telepak	303	4	The BLM is mandated to promote multiple-use, so the designation of “exclusive use zones” to decrease minimal or non-existent conflict is functionally against BLM management guidelines.	Under FLMPA, multiple use is defined as the management of public lands and their various resource values so they are used the combination that will best meet the present and future needs of all the American people.
Robert J	Telepak	303	5	If the Moab BLM is going to try to use user conflict as a management tool, it has to be on the basis of a significant amount of factual data collected by the BLM, not just reports of perceived conflict by extremist groups.	See response to comment 122-9
Robert J	Telepak	303	6	Please note that these are already-existing roads that have been overlooked by the Moab BLM. These areas include: Copper Ridge/Little Valley/Klondike Bluffs Sovereign area Strike Ravine 3-D Trail Flat Iron Mesa Behind the Rocks Negro Bill Canyon Dry Mesa Ten Mile Canyon Rainbow Rocks Gemini Bridges Mill Canyon Flat Iron Mesa A short segment (less than ¼ mile of road from an existing recognized road to the edge of the cliff overlooking Junes Bottom on the Green River. A short road segment that should be recognized nearby going to a viewpoint of Trin-Alcove *see attached maps.	See response to comment 206-11
Robert J	Telepak	303	7	Special Recreation Management Areas as	The DRMP/EIS specifically allows for routes to be added

				addressed in the draft RMP need to be expanded by the addition of language that would permit additional roads to be added, or connections between roads to be constructed in the future. This will give the Moab BLM the needed flexibility to respond to changing user needs or as a way of mitigation in case future difficulties develop over time.	to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). See also response to comment 120-30.
Robert J	Telepak	303	8	Open play areas for such vehicles in most of the White Wash Sand Dunes -a Copper Ridge Motorcycle Loop -A Cisco Desert Wash area.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Robert J	Telepak	303	9	-development of a Utah Rims SRMA	Commentor's statement is noted.
Christop her	Kauffman	304	1	Cross country unrestricted OHV travel should not be an option anywhere except the special sand dunes recreation area that is proposed.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Adrea	Lund	305	1	All 66.5 miles of the Colorado River proposed in Alternative B should be included as wild/scenic.	See response to comment 124-88.
Adrea	Lund	305	2	Cross country OHV travel should not be an option anywhere except the special sand dunes recreation area that is proposed in option C under Travel management consisting of 1,886 acres.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Adrea	Lund	305	3	A designated route of Hell Roaring Canyon (the route doesn't go as far up-canyon in alternative B) is upsetting - there are numerous archeological sites in the canyon's upper reaches, it	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan

				encompasses a riparian area, and the current route up-canyon hasn't been used in years and is overgrown with brush. Why designate this little-used route, especially when riparian and cultural resources are at risk of degredation?	based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Sharon	Hogan	307	1	It's apparent that all of the alternatives, even "C", fall short of a true trail inventory, as many non-road mountain bike, motorcycle and ATV trails are missing. That can be addressed by allowing for additions to the trail inventories as the planning process continues. Also as Kim [Schappert, Moab Trails Alliance] points out, new trail mileage allotments in the Alternatives should "include only those routes mapped across previously undisturbed terrain" and not be reduced by "trails developed on existing mapped roads." Anything already on the Grand County Transportation Inventory map should not be included as a "new" trail, even when used as part of a newly developed trail system.	See response to comment 122-15
Sharon	Hogan	307	2	Emphasis should be placed on motorized vs. non-motorized, rather than mechanized vs. non-mechanized when planning for recreational land use. Bicycles are human-powered, lightweight craft and should not be categorized with OHVs. This is consistent with your BLM National Mountain Biking Strategic Action Plan. Please remove bicycling from any definitions of OHVs and other all-encompassing variations of 'wheeled vehicle' classifications and remove any references to bicycles as mechanized vehicles. At times it is right to group bicucles and motorcycles together, but separate from other motorized vehicles when addressing specific single-track and slick rock areas.	The BLM recognizes that bicycles are not motorized vehicles. The Moab RMP is consistent with the BLM National Mountain Biking Strategic Action Plan. However, bicycles are mechanized conveyances. As such, they are not allowed in areas that are managed for hiking only (such as Wilderness Study Areas). Bicycles are allowed on all routes in the Travel Plan. In addition, the Travel Plan designates some routes and areas for mountain bike use only; this designation excludes motorized vehicles.
Sharon	Hogan	307	3	Alternative C addresses open cross country travel for ATVs but proposes strict boundaries around	See response to comment 124-14

				these areas. I would like to see included in the plan, areas where cross-country travel by hikers, bikers, equestrians, and motorcycles is allowed. These are the many large areas of slickrock in the resource area such as the Bartlett Wash area, the Monitor Merrimac area and the Slickrock Trail.	
Bob	Greenberg	308	1	I will be joining Councilman McNeely at future RMP meetings and request that my name be added to the notice list for meetings on the RMP that involve Grand County as a cooperating agency.	Commenter's request has been noted.
Bob	Greenberg	308	2	The proposed motorized travel route from where Dubinky Wash crosses the county road to Spring Canyon (near Jug Rock Flat) to its confluence with Hell Roaring Canyon. This route and all travel up Hell Roaring above the school section should be eliminated from the travel plan no matter what alternative is adopted.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Bob	Greenberg	308	3	The map for Alternatives C and D show a short route immediately to the south of the confluence of Hell Roaring and Dubinky Wash and going about 0.5 miles above Hell Roaring onto the sand dune before it turns north and dead ends. This appears to be a relict uranium-prospecting tract that has not been used in decades. It appears to have no purpose and should be eliminated from the travel plan no matter what alternative is adopted.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Bob	Greenberg	308	4	Ten Mile Wash below the midway cut off should be closed to motorized travel. As the only purpose for keeping Ten Mile below the midway cut off open to motorized recreation is for the purpose of motorized recreation itself, this would be an appropriate compromise between motorized and non-motorized recreation uses. There does not appear to be any other need or purpose for motorized access into lower Ten Mile.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

Bob	Greenberg	308	5	The Northwest end of Castle Valley via the “Golden Stairs” route to the Big Bend area on the river. This use [motorized recreation] should be eliminated as the entire Mat Martin Point area has outstanding value for non-motorized recreation.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Pam	Hackley	309	1	I find the Soil/Watershed analysis to be very good on the whole despite the fact that critical mapping of cryptogrammic soils was not made available to the analyst. The integrity of the soil resource is the foundation for protection for all the other resources identified. I encourage you to give much weight to effects on the soil resource to select even more protective measures than those outlined in Alternative B. Section 4.3.21, which describes unavoidable adverse impacts, also gives you supporting documentation to choose more protective measures.	The commentor's desire for the BLM to adopt more protective soil resource protection measures than those in Alternative B is noted.
Pam	Hackley	309	2	Based on much reading of this literature and on-the-ground experience, I disagree that impacts from all the potential activities described are short term (5-year). Please provide more supporting data and discuss the justification for identifying soil impacts as short-term. Please provide supporting information concerning what reclamation techniques are contemplated and why they will succeed within the 5-year time frame.	Most, if not all, of the existing routes in the Labyrinth, Hatch Point and Harts areas were constructed prior to 1985. They were in existence at the time of the 1985 RMP. All three of these areas were left open to cross country travel in the 1985 RMP, although Labyrinth was limited to existing roads by a FEderal Register notice in 2001 (to be in effect only until the new RMP was revised, and Harts and Hatch were limited to existing road by the 2002 Plan Amendment to the Grand RMP. Thus, the designation of a subset of the existing roads in the present Travel Plan does not represent a "loss" of wilderness values, since these roads have been in existence since the 1950's and 1960's. Limiting travel to designated roads, and eliminating cross country travel enhances any wilderness values that may lie in these areas.
Pam	Hackley	309	3	Since the metric for soils (watershed) impact analysis is ‘amount of disturbance’ and	BLM aknowledges that soil disturbance from dispersed activity can be substantial. However, BLM stands by the

				considering all the activity that is out there, ranging from hikers to OHVers to commercial boating to fuels management to industrial mining and beyond, I think the analysis should reevaluate the amount of potential disturbance. Disturbances from larger scale activities that require permitting, even grazing, may be addressed in site-specific mitigation plans but the actual disturbance caused by 'dispersed' activity that is not reviewable by project-level analysis can lead to very extensive damage, very quickly.	acres of disturbance impact analysis conducted for soil resources. In its analysis BLM took into account disturbance from dispersed and site specific activities to the extent possible. It is not possible for BLM to adequately quantify the amount of surface disturbance from most dispersed activities, such as hiking, because the data does not exist. Numbers have been added to Chapter 4 and to Appendix G that show the miles of route designated and not designated in erodible soils types. There are 167 miles of route that are closed in the preferred alternative because of soils conflicts.
Pam	Hackley	309	4	I would ask that cryptogrammic soils be mapped and quantitatively incorporated into the analysis because the extent of cryptogrammic communities is almost district wide. If I understand the analysis, these types of soils were considered sensitive (and key to soil integrity) but since they were not mapped, there was not a quantitative way to identify the full extent of impacts to them and thus sensitive soils as a whole which was used as the basis for analysis.	To date no mapping of biological soil crusts has occurred in the MPA. For the purposes of a planning level analysis this level of data is not necessary to adequately assess resource impacts especially given that implementation level decisions, prior to being made, will undergo site specific analysis. Further, extensive resources would be required to complete MPA wide mapping of biological soil crusts. BLM cannot justify allocation of these resources for such a mapping effort in light of the fact that current data is adequate for purposes of analysis of impacts in this document.
Pam	Hackley	309	5	The proposed road density is not acceptable and does not reflect a sound scientific analysis. This density will most assuredly result in deterioration of the foundation soil resource. This aspect of disturbance is not adequately addressed under soil/watershed resources. The road density when compared to adjacent BLM resource areas (e.g. San Rafael) is startlingly different. Please include road disturbance in the analysis of direct, indirect, and cumulative impacts.	The Moab Field Office area has been subject to a great deal more mineral activity (especially uranium exploration and oil and gas exploration and drilling) than has the San Rafael area. This is why Moab has six times the number of inventoried miles of route. The percentage of routes designated in Moab's preferred alternative is actually a lower percentage than those routes designated in the San Rafael Travel Plan. Road density was not a factor in the analysis of soils, as the greatest disturbance to soils occurred at the time the road was constructed/bladed. Miles of route, by alternative, in highly erodible soils has been added to the analysis.
Pam	Hackley	309	6	You have not chosen to review the Redrock Heritage Plan for Sustainable Economies and	See response to comment 124-9.

				Ecosystems. I think that the Redrock Heritage Plan does meet the purpose and need and respectfully ask you to consider and evaluate this proposal as a reasonable and viable alternative. Proposed areas of road closure do meet the purpose and need to protect riparian/soil/watershed resources from ground disturbing activities that may have unavoidable (4-495/496), irreversible/irretrievable (4-499), and cumulative (4-506/5-8) impacts.	
Pam	Hackley	309	7	I ask you to incorporate the recommendations and justification provided by the Utah Rivers Council and Holiday Expeditions that addresses designations for segments of the Green River.	See response to comment 124-88.
Pam	Hackley	309	8	I ask you to work in conjunction with other BLM jurisdictions that cover the Green River to attain a unified plan for the Green River watershed. It does not meet resource protection goals when there are separate jurisdictions to manage this very important area.	See response to comment 120-88
Benjamin L.	Reingold	310	1	There is not a true range of management options in the Alternatives. It needs to be made clearer that comments are needed on Alternatives for the RMP and Alternatives for the Travel Plan.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, [four]

					alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Moab DRMP/DEIS provides in comparative form the management actions associated with each alternative.
Benjamin L.	Reingold	310	2	The difference between an RMP (general guidance) and the Travel Plan (implementation decision) is not clearly described in the DEIS. The FEIS should clearly articulate the difference.	The routes identified in the Travel Plan are available under all other management scenarios proposed in the alternatives of the DRMP/DEIS such as ACECs, Wild and Scenic Rivers, SRMAs, Focus Areas, and Non-WSA lands with wilderness jurisdictions. A sentence was added to the PRMP/FEIS under Travel Management (Management Common to All Action Alternatives) for clarity that states, “routes identified in the Travel Plan would be available regardless of other proposed management actions”. The Travel Plan process is described in Appendix G of the DRMP/EIS..
Benjamin L.	Reingold	310	3	None of the Alternatives presented are acceptable as they stand, including the Preferred Alternative C, which mandates unworkable and impractical management of camping and motorized travel. Alternative D fails to provide a true motorized focus.	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.
Benjamin L.	Reingold	310	4	Many of the restrictions in all of the Action Alternatives are simply not justified, and that the FEIS should clearly draw a connection between the facts on the ground and the decision made.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and

					alternatives identified by the public. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis.
Benjamin L.	Reingold	310	5	BLM's open area in Alternative C and D must be expanded. The current proposal is unworkable because it confines a huge amount of vehicle use into a very small area and the area's boundaries are not well defined and cannot be easily identified on the ground.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Benjamin L.	Reingold	310	6	Requiring fences around the cottonwood trees and "water sources" is both impractical and unnecessary. We strongly oppose this provision of the Draft Plan.	See response to comments 208-3 and 479-6.
Benjamin L.	Reingold	310	7	BLM's open area at White Wash Sand Dunes should include the popular and challenging hill-climb on the Northwest of the Sand Dunes.	See response to comment 123-35
Benjamin L.	Reingold	310	8	BLM's open area should be located along easily identified geologic features, or preferably along boundary roads of Ruby Ranch Road on the West, Blue Hills Road on the North, and Duma Point/Ruby Ranch (back way) on the East.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Benjamin L.	Reingold	310	9	I oppose the fee system contemplated in Alternatives C and D. Fee systems are inherently controversial and often unpopular with the recreating public. The final RMP should not require a fee system. However, if funding for infrastructure needs cannot be met with existing funding and	See response to comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes. See response to comment 123-26, as well as comments 122-22, 124-11, 124-112 , and 124-110 regarding clarification of SRP policies.

				grant programs, then a fee system should be implemented only with the full involvement of the Recreational Fee Advisory Council. Because the open area boundary will not easily be identifiable on the ground, and also because of easy access to the proposed “fee area” from all directions, it will make this proposal extremely difficult to enforce. We suggest that the BLM consider other funding mechanisms to pay for the needed management infrastructure.	
Benjamin L.	Reingold	310	10	Proposing a “close first – mitigate last” approach to OHV use is unacceptable. The final RMP should mandate that adaptive management practices be used across the field office. The final RMP should direct that mitigation efforts will be exhausted prior to closure. The final RMP should direct land managers to work with the affected public to ensure all available mitigation efforts have been exhausted before closure. When using adaptive management principles, the RMP should mandate the mitigation of closing routes and areas to recreational use by designating a more sustainable, but similar recreational opportunity elsewhere.	See response to comment 122-18
Benjamin L.	Reingold	310	11	Providing opportunity for a non-motorized recreation experience is great, but by imposing a near categorical exclusion of other uses it removes the ability to designate key motorized uses that are needed in a well managed road and trail system. When addressing “user conflict,” the Final RMP	See response to comment 122-9

				should avoid “exclusive use zones” where based on perceived or potential “user conflict” one or more conflicting uses is categorically prohibited. Most of the non-motorized focus areas have designated routes open to motorized vehicles within them. If implemented as written in Alternatives B, C, and D, many visitors will perceive these focus areas as establishing blanket restrictions on motorized use. The unintended consequences will likely result in increasing, not reducing actual or perceived “user conflict.” In order to address the “user conflict” issue, the final RMP should direct land managers to educate the non-motorized visitors (who may perceive conflict with the motorized uses) where they may encounter vehicle traffic in certain areas as well as informing them of areas where they may avoid such encounters. The Final RMP should direct land managers to educate vehicle-assisted visitors of where a road or trail might be shared with non-motorized visitors, and if appropriate, direct lower speeds. The Final RMP should direct land managers to re-route either use so as to avoid sections of roads or trails that are extremely popular with both groups. For example, a hiking trail can be constructed to avoid a section of a popular OHV route. Or an equestrian trail may be constructed to avoid a section of popular mountain bike route, etc.	
Benjamin L.	Reingold	310	12	Moab BLM is closing a huge number of dispersed campsites, as outline in Appendix E. The Final EIS should disclose how many campsites would be closed under each alternative. Policy should	Public participation has been solicited throughout the land use planning process. No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to

				support that existing campsites are open, unless determined closure was necessary via lawful public planning process. The Final RMP should mandate full public involvement in any establishment and Management of “restricted camping areas” or “controlled camping areas.” BLM maps should easily show if campsites will be closed, and show if road is designated right up to campsite.	comments 123-8 and 120-86 for a discussion of dispersed camping. . The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Dispersed campsites would be signed; however, maps and signage are not land use planning decision.
Benjamin L.	Reingold	310	13	The Travel Plan and the Administrative Setting must be consistent in all SRMAs.	The routes identified in the Travel Plan are available under all other management scenarios proposed in the alternatives of the DRMP/EIS such as ACECs, Wild and Scenic Rivers, SRMAs, Focus Areas, and non-WSA lands with wilderness jurisdictions. A sentence has been added to the PRMP/FEIS under Travel Management (Management Common to All Action Alternatives) for clarity that states "routes identified in the Travel Plan would be available regardless of other proposed management actions'. The administrative setting described for each SRMA in Appendix F is a general setting for the entire SRMA. When Recreation Activity Management Plans are prepared for each SRMA, specific settings will be identified for each portion of the SRMA.
Benjamin L.	Reingold	310	14	All SRMAs with a motorized focus should include direction regarding when and how additional or expanded routes/areas would be provided should there be a need.	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). See also response to comment 120-30.
Benjamin L.	Reingold	310	15	SRMAs and their “focus areas” should avoid excluding other uses categorically. The Preferred Alternative clearly shows Moab BLM recognizes the importance of providing some motorized routes in non-motorized “zones.”	See response to comment 413-9.
Benjamin L.	Reingold	310	16	The Utah Rims SRMA is necessary to properly manage this popular area. It should have a motorized and mountain bike focus, and include the ability to designate or construct routes should	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). See response to comment 122-39 regarding the proposed boundary.

				they be needed in the future. In addition, limiting camping to one small designated area, in the RMP, is not wise. The RMP should provide general direction and not limit camping in such a way. The Utah Rims SRMA should extend further southwest to encompass Mel's Loop and beyond. Increased visitation there warrants the more active management of a SRMA. This larger area would also provide enough room for a full-day's motorcycle ride, and the establishment of a mountain bike focus area.	
Benjamin L.	Reingold	310	17	Yellowcat is increasingly popular for four wheeling and ATV riding. Designating a SRMA there would utilize the dense network of mine roads that already exist.	See response to Comment 122-38
Benjamin L.	Reingold	310	18	Although many popular ATV routes are classified as roads in the travel plan, some ATV trails are not proposed as open and some of the Motorcycle routes should be designated as ATV/motorcycle trails as well. Some of the "motorcycle trails" are very popular with ATV users. The final travel plan should designate a mix of single-track and ATV trails. The FEIS should consider designating more ATV trails, especially between White Wash and Red Wash. I strongly suggest looking closely at the proposal developed by Ride with Respect.	See response to comment 120-90
Benjamin L.	Reingold	310	19	In the Moab Field Office, true mountain bike single track trails are in short supply. The Mill Canyon-Sevenmile Rim biking focus area should be redrawn as Mill Canyon-Tusher Rims in order to provide better terrain for pedaling. The Final Plan should extend the South Spanish Valley biking area further south towards Black Ridge.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

Benjamin L.	Reingold	310	20	An open area in addition to White Wash could provide different terrain for everything from bicycle free riding, to trails motorcycling, to hardcore rock crawling. As 99% of the Moab Field Office becomes limited to designated routes, open areas play an even more critical role for accommodating specialized sports. Perhaps even part of Black Ridge could remain unrestricted for this purpose.	See response to comment 124-14
Benjamin L.	Reingold	310	21	The Sand Flats Recreation Area could adopt special policies to permit slickrock exploration. We support Ride with Respect's recommendation that mountain bike travel be allowed on any barren rock surface. Slickrock within one hundred yards of a designated route could be open to motorized travel. This two-hundred yard corridor would accommodate the ways that people currently enjoy Sand Flats.	See response to comment 122-42
Benjamin L.	Reingold	310	22	Some important motorcycle trails are missing from all alternatives. The preferred alternative includes about 100 miles of true motorized single track. Alternative D adds another 100 miles. But in total, the final plan should spare roughly 300 miles of non-road motorcycle routes from being closed. Alternative D falls just short of providing sufficient motorcycling opportunities. Since no single-track inventory was performed, the BLM should continue accepting data on existing routes, and consider them for implementation. The Utah Rims single-track network should include at least 25 miles of additional routes, in order to be as complete as the Dee Pass network. In particular, long-distance single-tracks and rugged roads that connect SRMAs offer a unique experience and spread people. The Copper Ridge Motorcycle Loop should be combined with	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				Thompson Trail in the final plan. A few more non-riparian washes should be left open, especially in the Cisco Desert. These travel-ways provide ATV and motorcycle riders an unconfined challenge that roads cannot.	
Benjamin L.	Reingold	310	23	The Moab BLM has included the White Wash Sand Dunes as a proposed Area of Critical Environmental Concern (ACEC) in Alternative B. This in turn; “gives SUWA whatever they want, despite the existing, traditional uses that have existed for decades” alternative. The White Wash ACEC is especially inappropriate.	Refer to response to comment 124-69.
Benjamin L.	Reingold	310	24	Congress gave very specific instructions to the BLM regarding Wilderness or Lands with Wilderness Character. Those instructions are contained in Section 603 of FLPMA. Congress instructed the agency to inventory all of their lands, identify which were definitely not of wilderness quality and then to begin an intensive inventory and analysis to determine which of the remaining lands would be recommended for inclusion into the National Wilderness Preservation System. There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the “603” process was completed, the agency was done with its Wilderness Review. Other than the management of existing WSAs, the BLM should have no part in this issue. TO do so is a tragic loss of management resources. When formulating land use plans and considering opportunites for solitude and unconfined recreation, the BLM must consider all other resource values and uses and attempt to balance	See response to comments 120-8, 121-10, 121-58, and 121-61.

				the competing uses and values using the Multiple Use/Sustained Yield paradigm.	
Rodney	Silliman	313	1	Our community [Green River] has three main bases – natural resources, local tourism, and people passing through needing gasoline, food, and lodging. The decisions reach in the DRMP will have an impact on the future of energy development in our area, and thus, on our community. Your analysis does not give enough consideration to these aspects and how energy development may benefit Green River over the next 15 years or so years. It seems that the impacts on the city of Moab are the only items considered. While it's the largest, richest, and most influential community in our area, its concerns shouldn't be the only ones considered.	Under the Reasonably Foreseeable Development (RFD) scenario for oil and gas projects relatively few wells would be drilled and would employ relatively few people. The BLM summarizes the minor costs and benefits associated with oil and gas development on local communities in Chapter 4, p. 260-264. The large-scale development that has occurred in certain areas would not occur in the MPA. A recently completed study by the University of Utah concludes that less than 1 per cent of the Grand County's economy is dependent on oil and gas activities, which corresponds closely to BLM's analysis in Chapter 4.
Gwenn	Amrase	314	1	As a resident of Green River, Utah, energy development and Off-Road Use are imporant to our future economy and community. The "Preferred" Alternative C which supposedly balances environmental and natural resource aspects, places too many restrictions on natural resource development.	The projected level of oil and gas activities in the MPA is low, with consequently low expected socio-economic impacts. Under the Reasonably Foreseeable Development (RFD) scenario for oil and gas projects, relatively few wells would be drilled and would employ relatively few people. The large-scale development that has occurred in certain areas, such as Vernal, would not occur in the MPA. The BLM has sought to provide recreation opportunities and benefits for the wide variety of users, all of whom potentially contribute to the local economy. For the reasons outlined in Chapter 4, p. 4-271, the BLM believes that Alternative C (the Preferred Alternative) provides the greatest economic benefit to the Moab planning area's economy in the context of OHV management. The number of wells projected in Alt C is 432. Alternative A (no action) projects 451 wells; Alt. D projects 448 wells. That is, even with all the

					"restrictions" imposed on oil and gas production in the preferred alternative, there are only 19 fewer wells over the life of the plan in Alt. C than in the no action alternative. Thus, the economic value of those 19 foregone wells is the "cost" of all the oil and gas restrictions imposed in Alt. C. It should be remembered that these 19 foregone wells are spread throughout the entire field office area; only a few of these wells are reasonably expected to be in the vicinity of Green River.
Gwenn	Amrase	314	2	Federal Law requires the BLM to do as much as possible to encourage smart, clean, safe energy development on Federal Lands.	See response to comment 124-115.
Cindy	Royse	315	1	My main concern is that your agency complies with ALL federal laws that try to make sure that energy exploration and development can continue in our area. Federal Energy Policy Acts have directed public land managers to do what they can to encourage domestic energy production on federal lands. The current RMP does not go far enough in this regard. In fact, I believe it closes too many areas to production. For instance, buffers for endangered species are included that are greater than standard practices (grouse).	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to

					provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. The DRMP/DEIS contains alternatives which strike an appropriate balance between environmental protection and development of the mineral resources on our public lands consistent with the requirements of the Mining and Mineral law and FLPMA. The PRMP/FEIS will offer BLM management the flexibility to protect resource values and uses while allowing for acceptable levels of mineral development.
Cindy	Royse	315	2	I think the BLM minimizes the potential economic benefits of energy production and over-estimates the benefits of conservation. While Moab will see positive impacts from Conservation – it is after all a relatively wealthy community with a major tourism base – other smaller and less wealthy communities like Green River will not see much in the way of those benefits. Green River will see much greater opportunity from more energy development.	The BLM’s analysis is based on the RFD. The large-scale development that has occurred in certain areas would not occur in the MPA. As described in Chapter 4, the BLM does not expect to see significant oil and gas development in the Moab planning area over the life of the plan, and therefore does not expect major socioeconomic benefits or costs from these activities. The BLM summarizes the minor costs and benefits associated with oil and gas development on local communities in Chapter 4, p. 260-264. A recently completed study by the University of Utah concludes that less than 1 per cent of the Grand County’s economy is dependent on oil and gas activities, which corresponds closely to BLM’s analysis in Chapter 4.
Shuanee	Narris	316	1	From what I have seen, the “multiple-use” directive is not receiving adequate attention in the Moab RMP. My request to you is to include in the RMP considerations of multiple use of the land and also of detailed statistics and projections on the effects of foreseeable resource development on the	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management

				economy and businesses of Green River, Utah. Failure to make these findings could be considered failures in your process under NEPA.	prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations.
Alton	Burns	317	1	Does the DRMP use outdated USGS data to determine the potential for energy extraction? Did the BLM in any way understate the oil, gas, and uranium potential in our region?	The Mineral Potential Report (2005) provides an assessment of all the mineral resources within the MPA. It provides a description of the geology and the mineral resources, a summary of exploration and development, a classification of the occurrence and development potential of each resource, and a projection of future development. The occurrence potential of each mineral resource is classified using the ratings system provided in BLM Manual 3031. See response to comments 121-67 and 124-95 regarding the Mineral Potential Report for the Moab Field

					Office. The Reasonable Foreseeable Development scenario is an analytical model, which estimates oil and gas activity that could potentially occur. The RFD scenario is a reasonable technical and scientific approximation of anticipated oil and gas activity based on the best available information, including the potential for oil and gas resource occurrence, past and present oil and gas activity in conjunction with other significant factors such as economics, technology, and physical limitations on access, existing or anticipated infrastructure, and transportation. The RFD is purely an estimate; it is not a decision document nor does it establish a limiting threshold for future Federal leasing, exploration, or development activities. Rather, it is a scenario or projection of actual and hypothetical oil and gas activities based on the specific circumstances or constraints associated with each alternative and corresponding mitigation measures. This hypothetical framework focuses the impact analysis associated with oil and gas leasing. Because the calculations are based on variables or factors that are difficult to accurately determine, the projection of oil and gas wells can vary greatly. These variables or factors include the price of oil and gas, the success or failure of exploration in unproven areas, and the willingness of investors to invest their money in risky exploration for oil and gas in unproven areas. As project-specific drilling operations are being considered, the BLM performs a land use plan conformance review and determination of NEPA adequacy. If conditions change, the BLM may need to reconsider the land use plan decision and perform further NEPA analysis in either an environmental

					assessment or an environmental impacts statement. See response to comment 214-1 regarding the RFD for oil and gas. The Mineral Potential Report provides a projection of development for all other minerals in the Moab planning area. This report is available on the Moab RMP website. The information contained in the Mineral Potential Report is summarized in Chapters 3 and 4 of the DRMP/EIS.
Alton	Burns	317	2	Also, does the DRMP restrict too many areas from both natural resource extraction and other uses? Does it in any way violate the spirit of federal directives that encourage domestic energy production?	In accordance with the Energy Policy Conservation Act, the least restrictive stipulations were applied to protect important natural resources. See response to comments 203-46 and 210-2. See response to comment 121-15 regarding other restrictions.
Mike	D	318	1	The town of Green River is actually in Emery County and may be covered in a different RMP; however, I think it should also be covered in the Moab RMP since the activities on your lands affect our town and business. Development in the Moab RMP will have enormous effects on our community. By placing too many restrictions on this development, oil and gas companies may go elsewhere, including outside the country, for their operations. This will have a severe negative economic impact on our local economy.	See response to comment 124-125 .There appears to be confusion concerning the Reasonably Foreseeable Development (RFD) scenario for oil and gas development in the Moab planning area with other places in the West such as Pinedale, Wyoming or Vernal, Utah, both of which have seen major positive and negative impacts from minerals development. Under the Reasonably Foreseeable Development (RFD) scenario for oil and gas projects relatively few wells would be drilled and would employ relatively few people, especially those from within the planning area. The BLM summarizes the minor costs and benefits associated with oil and gas development on local communities in Chapter 4, p. 260-264. The number of wells projected in Alt C is 432. Alternative A (no action) projects 451 wells; Alt. D projects 448 wells. That is, even with all the “restrictions” imposed on oil and gas production in the

					preferred alternative, there are only 19 fewer wells over the life of the plan in Alt. C than in the no action alternative. Thus, the economic value of those 19 foregone wells is the “cost” of all the oil and gas restrictions imposed in Alt. C. It should be remembered that these 19 foregone wells are spread throughout the entire field office area; only a few of these wells are reasonably expected to be in the vicinity of Green River. The text in Chapter 3 concerning socioeconomics has been altered to include the fact that economic effects include those on the neighboring communities of Green River or Grand Junction. Green River is within the Price BLM planning area.
Bruce	Hansen	319	1	It states that most restrictive alternative B will only have a minimally lower economic benefit to communities affected. This doesn't make sense. If we were to fully develop ALL natural resources that are reasonably available, the local economies would all do extraordinarily well. Because of this, it seems that the analysis in the RMP does not adequately consider economic effects (or possibilities) especially on the rural communities outside of Moab.	The fiscal impacts have been described in Table 2.2 on pg. 2-78 (DRMP/EIS) in terms of royalty revenue. This table shows that royalty revenues will be reduced by 50% in Alt B. In addition property tax revenue, and severance tax data have been added to the table for the PRMP/FEIS and likewise show a 50% reduction in revenues in Alt B as compared to Alt C. On pg. 4-264 of the Draft RMP/EIS it is stated that employment related to oil and gas development would be less under Alt B. The effects on employment and wages have been added to Chapter 4 of the PRMP/EIS. However, it is important to note that under the Reasonably Foreseeable Development (RFD) scenario for oil and gas projects relatively few wells would be drilled and would employ relatively few people, especially those from within the planning area. The BLM’s analysis is based on the RFD; the commentor has provided no evidence that the RFD is incorrect. Although Green River is outside the planning area, the fact that planning area decisions affect neighboring towns has been added to Chapter 3. It should be noted that the 1985 Grand RMP makes available virtually all

					natural resources of the planning area. These resources have not been leased or developed to date.
Allen	Burns	320	1	Many people who live and work in Green River would like the Moab RMP to acknowledge the importance that ongoing mineral development like uranium and natural gas have on our community. Our current economic base is very dependent on both recreation and supporting the resource industries. Development in the Moab RMP will have enormous effects on our community – some positive and some negative that you need to adequately consider in your deliberations.	See response to 124-125. There appears to be confusion concerning the Reasonably Foreseeable Development (RFD) scenario for oil and gas development in the Moab planning area with other places in the West such as Pinedale, Wyoming or Vernal, Utah, both of which have seen major positive and negative impacts from minerals development. As described in Chapter 4, the BLM does not expect to see significant oil and gas development in the Moab planning area over the life of the plan, and therefore does not expect major socioeconomic benefits or costs from these activities. The BLM summarizes the minor costs and benefits associated with oil and gas development on local communities in Chapter 4, p. 260-264. The impacts such activities have had in other parts of the West is unlikely to apply to the Moab planning area (MPA).
Kerry	Bigelow	321	1	It closes too many areas, not only to oil and gas, but also to motorized vehicle use. Both of these items are extremely important to the current and future economy of Green River. The preferred alternative will restrict the economies of the rural communities of eastern Utah, both within the RMP area and areas outside the area, including Green River and Monticello.	The projected level of oil and gas activities in the MPA is very low, with consequently low expected socio-economic impacts. The BLM has sought to provide recreation opportunities and benefits for the wide variety of users, all of whom potentially contribute to the local economy. For the reasons outlined in Chapter 4, p. 4-271, the BLM believes that Alternative C (the Preferred Alternative) provides the greatest economic benefit to the Moab planning area's economy in the context of OHV management.
Kerry	Bigelow	321	2	I encourage you to be sure that you adequately considered the Energy Policy Conservation Act and Executive Order 13211, which requires you to remove as many impediments to oil and gas exploration as possible. The RMP in its current	See response to comments 203-46 and 210-2.

				form includes too many restrictions on energy development. In fact, it closes more areas than leaving things as is. The RMP claims to balance these items.	
Claire	Malonado	322	1	Green River is very close to the area being discussed in the Moab RMP. Green River's economy is currently depending on recreation [activities]. However, natural resource development is the best way for us to take the next step and really improve the economic well being of residents here. All of these things need to be considered and analyzed in your proceedings with regard to the Moab RMP.	Under the Reasonably Foreseeable Development (RFD) scenario for oil and gas projects. relatively few wells would be drilled and would employ relatively few people. The BLM summarizes the minor costs and benefits associated with oil and gas development on local communities in Chapter 4, p. 260-264.
Erika	Schoen	323	1	I understand that public review deadlines for several other lengthy DRMP and DEIS documents impacting southern Utah are also upcoming in the next few months. While BLM encourages specific comments, preparation of specific comments would require more time for public review. Therefore, I would like to comment that extended public review period for these many documents would generate more useful comments for the BLM to consider.	See response to comment 124-1
J	McGill	324	1	90 days is not enough time to comment on these complex proposals. The time limit must be extended and more public input sought.	See response to comment 124-1
Mike	Bassett	325	1	I feel that the draft Moab RMP unfairly favors consumptive resource use like off road vehicle access to wilderness-quality lands, as well as unrestrained oil and gas leasing. The current draft of the Moab RMP is just another step in [the land's] degradation.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was

					given to all potential alternatives identified. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. The DRMP/DEIS contains alternatives which strike an appropriate balance between environmental protection and development of the mineral resources on our public lands consistent with the requirements of the Mining and Mineral law and FLPMA. The PRMP/FEIS will offer BLM management the flexibility to protect resource values and uses while allowing for acceptable levels of mineral development. Alt C of the DRMP/EIS provides balanced management for the resources in the Moab planning area. Over 2,500 miles of existing route are not designated in Alt C; oil and gas leasing is subjected to both major and minor

					stipulations.
Patricia	Vidiella	326	1	Alternatives A and D are absolutely outrageous, if we take into consideration all the body of scientific research and evidence (remember those pictures of dust storms, and the cheat grass fires in the news?) indicating that such type of management would produce irreversible damage to the land with severe consequences for all living beings (including those who enjoy riding their OHV cross country!) The preferred alternative, C, is a little bit less outrageous, but also unacceptable because it proposes to convert a vast area (almost 2000 acres) in potential hazard for the rest of the land (again remember the pictures of dust storms, and the cheat grass fires in the news?).	The commentor's thoughts regarding management under Alternatives A, C, and D are noted.
Patricia	Vidiella	326	2	Alternatives A and D are absolutely outrageous, if we take into consideration all the body of scientific research and evidence (remember those pictures of dust storms, and the cheat grass fires in the news?) indicating that such type of management would produce irreversible damage to the land with severe consequences for all living beings (including those who enjoy riding their OHV cross country!) The preferred alternative, C, is a little bit less outrageous, but also unacceptable because it proposes to convert a vast area (almost 2000 acres) in potential hazard for the rest of the land (again remember the pictures of dust storms, and the cheat grass fires in the news?).	Alternative C proposes to manage 1,866 acres in and around the White Wash Sand Dunes as open to cross country travel by OHVs. Alternative C limits travel to designated routes in the remainder of the planning area. Chapter 4 of the DRMP/EIS acknowledges that Alt B, with 0 acres open to cross country travel, results in fewer impacts to soils than does Alt C. The area around White Wash Sand Dunes is primarily sand dunes, and cheat grass is not an issue.
David	Rohde	327	1	Please consider expanding the “open” area at White Wash, to be large than drafted in Alternatives C & D. I practice “staying the trail,” but there are such few places left that will sustain	See response to comment 123-35

				cross country travel and open riding, this is one suited for that. I express this for leaving open area for dispersed camping also. The proposed boundaries of open vs restricted/closed would leave too small an area for the amount of vehicle use this area experiences. And the boundaries are not well defined which would make it difficult to identify on the ground.	
David	Rohde	327	2	The camping policy as stated in Appendix E. I support a policy where existing campsites are open, unless closure was determined via a lawful public planning process. It is important for the final RMP to mandate having full public involvement in any establishment and management of designated camping areas.	Public participation has been solicited throughout the land use planning process. No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsite closures depends upon site specific conditions
Philip	Teisl	328	1	I believe it is unlawful to go backwards and create wilderness areas where the BLM so chooses to appease other groups.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Philip	Teisl	328	2	It is not sound management to close areas, as in the White Wash area, to restrict users to a small area, is not a good idea, if anything, the open areas in Alt C and D should be increased.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Philip	Teisl	328	3	Proper signage and education should be tried prior to fencing around trees and water holes.	See responses to comments 208-3 and 479-6 regarding fencing. Education and Signage are all administrative actions and do not require land use planning decisions. These suggestions will be considered during implementation of the Travel Plan after the land use plan is completed.

Philip	Teisl	328	4	The proposed “Individual Recreation Permit” If the current needs cannot be met with the normal funding/grand programs, only then should a fee system be utilized.	See response to comment 123-10.
Philip	Teisl	328	5	The camping policy suggested in Appendix E – the existing campsites should remain open until solid proof shows that different management should be used, and then with public input on new proposals.	Public participation has been solicited throughout the land use planning process. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsite closures depends upon site specific conditions.
Philip	Teisl	328	6	There should be increased focus for motorized and mountain bike use in the Utah Rims SRMA, including the ability to construct new routes in the future, and the area should extend southwest to also encompass Mel’s Loop.	See response to Comment 122-39. The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).
Philip	Teisl	328	7	The Yellowcat area is should also be in a SRMA, using the existing networks of roads, etc.	See response to Comment 122-38
Philip	Teisl	328	8	Many of the motorcycle trails are actually ATV trails.	See response to comment 120-90
Bobby	Mock Family	341	3	Alternative D is too restrictive. The dry washes should be left open, as they provide travel-ways for dirt bikes/ATVs, and are not harming important wildlife habitat.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Bobby	Mock Family	341	4	Please rethink your plans and allow for more public input.	See response to comment 124-1
John M	Whitaker	343	1	Given the lack of visibility I was not aware of your efforts to create a Moab DRMP or the deadline for comments on november 30. I read the paper and watch the news. I have seen nothing to indicate what you guys are up to. Is it a secret?	See response to comment 124-1

John M	Whitaker	343	2	Poor public notification and short comment period	See response to comment 124-1
Judy	Rue	344	1	Your open area at White Wash in Alternative C and D needs to be expanded. The current proposal is unworkable because it closes the killer hillclimb and camping area to the west of the Dunes.	See response to comment 123-35
Judy	Rue	344	2	I looked at your maps and cannot tell if the campsites we used are going to be open or closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Judy	Rue	344	3	The Utah Rims SRMA should extend further southwest to encompass Mel's Loop and beyond.	See response to comment 122-39
Judy	Rue	344	4	Yellowcat is increasinly popular for 4-wheeling and ATV riding. Designating a SRMA there would utilize the dense network of mine roads that already exist.	See response to comment 122-38
Kincade	Bauer	345	1	I believe that none of the 4 alternatives are adequate to meet the needs of most visitors to Moab and futher reasonable alternatives proposed by interested parties such as Ride with Respect are required to be studied prior to issuing a decision. At the least, a supplemental study of these alternatives should be conducted.	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.
Kincade	Bauer	345	2	In regards to the inventory done by Moab BLM, I believe that there are many motorcycle, mountain bike, and ATV trails that were not included, I would strongly suggest that these need to be inventoried	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan

				prior to the final plan. The current inventory is deeply flawed and omits some very important trails.	based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Roland	Tolman	347	1	Please reconsider your deadline for public comment. The DRMP is a very large, poorly researched document and I feel that those of us with an interest in it have not had sufficient time to give it a thorough review in the time allotted before the public comment period ends. It seems that every special interest group out there is scrambling to get whatever information they can out on the internet for their members to make comment according to. Even they (the special interest groups) aren't completely certain about all the consequences of the different proposed alternatives. Without more time for the public to review the DRMP, I worry about hasty commentary without sufficient thought and review put into it. Also, I worry about the litigation that will surely come about as the BLM attempts to implement the Final RMP due to the short timeline of public involvement and the confusing and conflicting maps.	See response to comment 124-1
Roland	Tolman	347	2	Easter Jeep Safari should remain fully open and accessible to motor vehicles and be included in full in the designated routes of the Final RMP.	See response to comment 206-11
Roland	Tolman	347	3	I am concerned about the following routes / areas that do not show up as open to motorized travel on the designated route maps of Alternative B: Dry Mesa (N38º43'15.75"/W109º27'20.72" heading Southwest- the area south of Wolf Ranch as you leave the Arches National Park boundary with view into the park itself and down into the Colorado Riverway)	See response to comment 206-11
Roland	Tolman	347	4	I am concerned about the following routes / areas that do not show up as open to motorized travel on the designated route maps of Alternative B: Mat	See response to comment 206-11

				Martin Point (N38º37’32.28”/W109º27’34.38” heading Northeast – the far northern area of Porcupine Rim as bounded by Castle Valley, the Colorado Riverway, and Negro Bill Canyon)	
Roland	Tolman	347	5	I am concerned about the following routes / areas that do not show up as open to motorized travel on the designated route maps of Alternative B: The Rusty Nail Trail (N38º36’5.76”/W109º39’20.18” heading East – the alternate route that connects the lower portion of the Gold Bar Rim trail and the Golden Crack area of the Golden Spike trail)	See response to comment 206-11
Roland	Tolman	347	6	I am concerned about the following routes / areas that do not show up as open to motorized travel on the designated route maps of Alternative B: Hunter Canyon Rim (N38º29’43.84”/W109º33’53.53” heading Northwest to N38º30’25.67”/W109º35’13.78” – the spur between the Pritchett Canyon route and Kane Creek Blvd)	See response to comment 206-11
Roland	Tolman	347	7	I am concerned about the following routes / areas that do not show up as open to motorized travel on the designated route maps of Alternative B: The Shafer Trail Spur (N38º28’16.80”/W109º42’45.88” heading North – the spur that heads north off Shafer Trail and dead ends directly below the eastern side of Dead Horse Point)	See response to comment 206-11
Roland	Tolman	347	8	I am concerned about the following routes / areas that do not show up as open to motorized travel on the designated route maps of Alternative B: Long Canyon Overlook (38º33’04.68”/W109º42’02.76” heading East-the area that is bounded by Long Canyon to the South, the Colorado Riverway to the East, and Day Canyon to the North)	See response to comment 206-11
Roland	Tolman	347	9	I am concerned about the following routes / areas that do not show up as open to motorized travel on the designated route maps of Alternative B: Coyote Canyon (N38º24’40.40”/W109º25’43.41”	See response to comment 206-11

				heading North – located in the area west of Area BFE)	
Roland	Tolman	347	10	I believe that the following routes / areas were mistakenly mapped incompletely on the DRMP on Alternative C, I oppose these route remaining partially or completely absent from the designated trails in the Final RMP; I support the position of the Utah 4 Wheel Drive Association and Red Rock 4 Wheelers with respect to these omissions and any that I may have personally overlooked: Flat Iron Mesa Route. It appears that several short sections of the Flat Iron Mesa Easter Jeep Safari route are missing from the designated routes maps, including the popular Easter Egg Hill. I hope this is an accidental omission. I would like to see the entire route shown clearly on the Final RMP. Strike Ravine route. The popular obstacle, the “Big Ugly,” as well as the section of Strike Ravine that crosses Kiley Miller’s property have been left off the designated routes maps. Again I hope that this is an accidental omission. I remind BLM that the Red Rock 4 Wheelers have successfully defended this route as legal in court over the last few years. I would like to see the entire route shown clearly on the Final RMP. Crystal Geyser route. Short sections of the Crystal Geyser Easter Jeep Safari route are missing from the designated routes maps. Hopefully accidentally omitted, I would like to see the entire route shown clearly on the Final RMP. 3D route. Short sections of the 3D Easter Jeep Safari route are missing from the designated route maps. Hopefully accidentally omitted, I would like to see the entire route shown clearly on the Final RMP.	See response to comment 206-11
Roland	Tolman	347	11	I believe the following routes / areas are conflictingly mapped. Each of these listed	See response to comment 206-11

				designated routes, as shown on the maps for Alternative C, appear to be within the boundaries of areas that are closed to motorized vehicles as shown on the travel plan. These conflicting maps are confusing to me as I have attempted to decipher them. I know that the Blue Ribbon Coalition is working hard to identify additional conflicts and inconsistencies and might find some that I have overlooked in the short time that I've had available to review the documents; I support the position of the Blue Ribbon Coalition concerning mapping conflicts. Please assure that all designated routes are clearly mapped and that the boundaries of areas closed to motorized travel are adjusted so as to clarify the status of all proposed designated routes as open to motor vehicle use, especially the following: Rusty Nail (N38º36'5.76"/W109º39'20.18" heading East) Moab Rim (N38º33'34.05"/W109º34'57.88" heading Northeast) Pritchett Canyon (N38º32'11.49"/W109º35'55.15" heading Southeast) Long Canyon "Overlook" (38º33'04.68"/W109º42'02.76" heading East)	
Roland	Tolman	347	12	The Black Ridge area, the Sand Flats Recreation Area, and the Yellow Circle Mine area have terrain that could work well to incorporate additional open travel.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Roland	Tolman	347	13	It is not clear how many existing campsites would be inaccessible under the policy. The FEIS should clearly state how many campsites would be closed under each alternative.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for

					adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsite closures depends upon site specific conditions.
Roland	Tolman	347	14	More clarification is needed as to what is considered obtrusive damage. The stipulation of “trampled vegetation” seems vague to me. It could be interpreted too broadly, resulting in unintended restrictions.	The commentor refers to the discussion of dispersed camping in Appendix E, Section E.1.2. The determination of obtrusive damage must be made on a site-specific basis; the examples given in the appendix are intended to show what type of damage might lead to a future action. Professional judgment would guide this decision in the future, along with a site specific study of damage.
Roland	Tolman	347	15	The restriction that disbursed campers must stay on designated routes is confusing. Does it mean that a campsite that is 50 yards off a designated route cannot be accessed by motor vehicles?	Yes. See response to Comment 120-86 regarding access to dispersed campsites. See responses to comments 120-86 regarding access to dispersed campsites. One of the express purposes of leaving a route open for travel was to provide access to a campsite. If roads to specific dispersed campsites have been omitted in the Travel Plan, they may be added at a future date through site-specific NEPA analysis.
Roland	Tolman	347	16	I feel that many of the restrictions in all of the Action Alternative are unclear in purpose. I feel that the FEIS needs to draw a clear connection between facts on the ground and any decision made. Also, I feel the DEIS does not clearly describe the difference between the Recreation Management Plan and the Travel Plan. The FEIS should clarify the difference.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the

					issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis.
Zachary	Lowe	353	1	There are certain areas that OHV use is allowed and quite prominent such as Sand Flats and Behind the Rocks and both areas show heavy impact from OHV use both on and off the designated trails.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Larry	Ruffin	354	1	Just look at the Piute Trail System west of Moab and see the benefits it gives to the small towns interconnected to it. It is managed and there are rules to follow but it does not exclude any one user group. Please consider it as a successful case study as you formulate a proposed resource management plan for the Moab area.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Paul	Obert	355	1	We love camping out there and accessing Mary's Trail, 10 Mile Wash, White Wash, and all the areas around the town of Moab and south of Green River.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Paul	Obert	355	2	Gemini Bridges road has amazing bridges to ride across, please keep these open. Ride with Respect has addressed ten Mile Wash, the Thompson Trail and Copper Ridge all, and we support their proposal.	See response to comment 206-14
Bud	Evans	356	1	At a time when more people are retiring and population is increasing it is counterproductive to close off recreation areas. For example, the White Wash area in Alternative C & D needs more open areas. Confining vehicles and campers to smaller areas is not the way to go.	See response to comment 123-35

Bud	Evans	356	2	Gemini Bridges, Thompson Trail, and Copper Ridge loop and Ten Mile Wash need to be kept open.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Steve	Frisbie	357	1	When we are riding our dirt bikes, we enjoy riding the White Wash Sand Dunes, 10 Mile Wash, Green River Trail, and the area's other great motorcycle trails.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Steve	Frisbie	357	2	Your open area at White Wash in Alternative C and D must be expanded. The current proposal is unworkable because it closes outstanding hill-climbing and camping area to the West of the Dunes.	See response to comment 123-35
Steve	Frisbie	357	3	Yellowcat is increasingly popular for four wheeling and ATV riding. Designating a SRMA there would utilize the dense network of mine roads that already exist.	See response to comment 122-38
Mike	Thurston	358	1	I would like to see the entire Flat Iron Mesa Trail included on the proposed maps.	See response to comment 206-11
Mike	Thurston	358	2	I would like to see "Big Ugly" on the Strike Ravine Trail included.	See response to comment 206-11
Mike	Thurston	358	3	Sections of Crystal Gyser and 3D trails are also not included on the proposed maps.	See response to comment 206-11
Mike	Thurston	358	4	I would like Coyote Canyon Trail to be included on proposed maps.	See response to comment 206-11
Scott	Edwards	386	1	Expansion of the open area in White Wash along with the trails named; Flat Iron Mesa, Strike Ravine, 3D trail, Gemini Bridges, White Wash Sand Dunes, and Coyote Canyon.	See response to comment 123-35
Michael	Judd	387	1	Flat Iron Mesa, Strike Ravine, and 3D Trails left	See response to comment 206-11

				open for future travels.	
Nick	Jenkins	388	1	Include the Coyote Canyon Trail, expand the open area at White Wash, and include the "missing areas" of Flat Iron Mesa, Strike Ravine, 3D Trail	See response to comment 206-11
Amanda	Mair	389	1	Flat Iron Mesa and Gemini Bridges left open for public use.	See response to comment 206-14
Robby	Flasro	390	1	Flat Iron Mesa, Coyote Canyon, and Gemini Bridges must remain open for access.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Candace	Williams	391	1	I do not want Gemini Bridges to close	See response to comment 206-14
Paul	Rossiter	392	1	Flat Iron Mesa, Strike Ravine, 3D, Gemini Bridges, White Wash Sand Dunes, and Coyote Canyon to be open for access.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Teri	Underwood	409		The DRMP is unbalanced in favor of ORV users. The BLM DRMP plan for recreation is substantially unbalanced. It is unreasonably weighted in representation of ORV users and does not adequately address other recreational users such as hikers, bikers, and campers. In addition, the plan does not address the fact that the majority of the public is in favor of limiting ORV routes. In the scoping summary section 2.1, the BLM lists major challenges facing the planning team. Creating public interest in attending the scoping meetings and reaching those who use the public lands was identified. To combat these problems BLM says that is created a public participation plan	The BLM worked with an interdisciplinary team of resource specialists, which included representatives from Grand and San Juan Counties to develop the alternatives for the Travel Plan in the DRMP/DEIS. The ID team reviewed each route for purpose and need weighed against resource conflicts. These conflicts are identified route by route in the GIS data developed for the Travel Plan which is available in the administrative record. The impacts identified for travel management in the DRMP/DEIS are derived from this data.

				to ensure all voices are heard, rather than a dominant fee and contained tactics to draw dialogue from stakeholders representing a cross-section of viewpoints rather than from polarized views. Although BLM recognizes these important elements it fails to carry through with implementing them in the plan. This is evidenced by unilateral reliance on the counties road map to develop the travel plan. The travel plan involves numerous stake holders and they all need representation. The Moab BLM responsible for developing the DRMP has admitted that the ORV special interest groups are loud and fanatic. The Moab BLM consulted closely with the county in development of their road plan. In fact the road plan in their preferred alternative is almost identical to the counties plan. According to several people I know in Moab, when the BLM was consulting with the county they spent a substantial portion of time working with a county representative named Jerry McNeely (whom I do now know). Although this can not be substantiated in this document, Moab residents have told me that Jerry McNeely is sympathetic to ORV special interests and that Jerry McNeely did not consider other interests, such as hikers, campers, and mountain bikers when recommending travel routes to the BLM for the DRMP. When looking through the scoping document it can be seen that the majority of comments were about ORVs and it appears from the document that the majority of comments were in favor of restricting ORV use. Yet when developing the DRMP the	

				entire travel route was prepared with unreasonable reliance of parties with a special interest in ORV trails.	
Teri	Underwood	409		The DRMP does not adequately address the important recreation issue of NOISE. Noise pollution eliminates my recreation experience entirely. How are you going to reduce noise pollution? An issue that was not adequately addressed but yet is of huge importance in the recreation arena is noise. This issue must be addressed because there is been a huge, huge influx of new ORVs using the DRMP lands in comparison to a decade ago, there are thousands of miles of proposed OHV routes in the DRMP, and there is a predicted increase in the population and OHV users in the coming decades. I can no longer go to many areas I used to enjoy because of the noise and fumes of ORVs. This includes but is not limited to: Gemini Bridges, Moab Rim, Upper Courthouse Wash area, Klondike Bluffs, and Porcupine Rim. Table 4.3.8.2.13.1 on page 146 of chapter 4 shows how ORV management would be applied in each alternative, in acres, as open or limited to lands inventoried to as having wilderness character. In this same chapter, the EIS admonishes that under ALL alternatives Noise of vehicles using routes proposed would reduce opportunity of visitors to find solitude in wilderness character lands, especially in proximity to the routes. Motorized routes would conflict with primitive and unconfined recreation opportunities found in wilderness character lands.	See response to comment 122-7.
Teri	Underwood	409		DRMP proposed management of SRMAs (2-18, 2-8-B, 2-8-C) are too general and leaves wilderness character lands open to irreparable damage that	The impacts to all of 266,485 acres of non-WSA lands that were found to have wilderness characteristics are disclosed in Chapter 4 of the DRMP/EIS. Land use

				will compromise its wilderness character. The DRMP needs to address how it will specifically handle each section of land that had been inventoried to have wilderness character. The current DRMP is inadequate in this area because lands that have been inventoried as having wilderness characteristics have been chopped up into different management categories and not considered in their entirety.	planning is a tiered process ranging from broad general allocations and management prescriptions to subsequent site-specific authorizations. The land use plan provides allocations for each acre of land in the planning area. As stated in Chapter 4 of the DRMP/EIS, over 40% of the lands with wilderness characteristics are managed as no surface occupancy, whether or not they are specifically managed to protect wilderness characteristics. After completion of the RMP process, those SRMAs that do not currently have RAMPs will need to develop a site specific RAMP, subject to full compliance with the NEPA. See also response to comment 121-9 regarding the layering of designations and response to comment 124-53 regarding management of Non-WSA lands.
Teri	Underwoo d	409		Need to consider existing funding and staff for plan management. Several issues were raised through public scoping and described in the Scoping Summary. In the summary is a list of issues beyond the scope of the plan. On that list is “availability of funding and personnel for managing problems.” Availability (of more $) is different than EXISTING funding and personnel. And this issue of whether the BLM can manage this plan with the current budget and staff that now exists is a huge part of the success or demise of this plan or any plan. This issue IS a basic tenet of managing all programs in both public and private sectors on a worldwide basis. Therefore, I feel this plan needs to be revised to consider this basic tenet of management. In view of the criticism BLM has gotten for not being able to properly manage the lands with current status, I find it ridiculous to NOT consider it.	See response to comment 124-20
Teri	Underwoo	409		The DRMP fails to consider the fact that many of	See response to comment 121-67 regarding mineral

	d			the lands with wilderness characteristics are already leased. These include: Arches Adjacent, Dead Horse Cliffs, Dome Plateau, Floy Canyon, Flume Canyon, Goldbar, Shafer Canyon, Hunter Canyon, Coal Canyon, Goldbar, Hatch Wash, Labyrinth Canyon, and Hunter Canyon. The DRMP needs to determine how they will manage these lands to retain their wilderness characteristics with their current leases. This is not addressed in the plan.	policy. The valid existing leases on the lands with wilderness characteristics are disclosed on pg. 4-118 and 4-119. Arches Adjacent contains 56 leased acres (<1%); Dead Horse Cliffs contains 237 leased acres (30%); Dome Plateau contains 2,364 leased acres (17%); Floy Canyon contains 8,859 leased acres (86%), Flume Canyon contains 1,356 leased acres (38%), Goldbar contains 1,125 leased acres (17%); Shafer Canyon contains 179 leased acres (9%), Hunter Canyon contains 251 leased acres (5%), Coal Canyon contains 13,312 leased acres (62%), Hatch Wash contains 3,006 leased acres (27%) and, Labyrinth Canyon contains 3,658 leased acres (14%). Valid existing rights are guaranteed regardless of decisions in the Land Use Plan. Should these leases be developed, wilderness characteristics would not be retained in that portion of the unit. None of the listed units is proposed for management to protect its wilderness characteristics in the preferred alternative.
Teri	Underwood	409		Moab RMP needs to rely on the inventory of the wilderness character lands to revise their management plan, as required by law. This means that wilderness character lands found in the inventories need to be managed to protect their values. The Interior Department's settlement with the State of Utah in 2003 established that the BLM does not have the authority to establish Wilderness Study Areas. But the Interior's BLM Instruction Memorandum 2003-274 and 275 clarified the procedure in Consideration of Wilderness Characteristics in Land Use Plans. The Memorandums said that the settlement did not diminish the BLM's authority to inventory public land resources and to consider them during land use planning. According to FLPMA, section 201,	See response to comments 120-8, 121-10, 121-58, and 121-61.

				the Secretary is required to maintain on a continuing basis an inventory of all public lands and their resource and other values (including but not limited to, outdoor recreation and scenic values) giving priority to areas of critical environmental concern. In addition, FLMPA section 202 c-3 and c-4 respectively, say that the Secretary is also required to give priority to the designation and protection of areas of critical environmental concern and rely, to the extent it is available, on the inventory of the public lands, their resources, and other values when developing and revision of land use plans. All the lands inventoried as wilderness contained in HR 1796 and S639, America's Red Rock Wilderness Act, including all the lands listed in table 15B-1 in the DRMP EIS and found to have wilderness character in the BLM's 1999 inventory should be off limits to ORV routes, ROW, mineral exploitation and other activities that will irreparably damage their wilderness character. There is no doubt that activities proposed in Alternative C will irreparably damage these lands and this is documented in the BLM's EIS (chapter 4). It is the BLM's fiduciary responsibility to the national interest, as is evidenced by the choice of Alternative C as their preferred alternative, is more seriously in question than prior to the release of this document.	
Teri	Underwood	409		Scoping inadequate and does not lead to balanced plan. Federal law dictates that you need to determine who the public is when planning land use. The methods you used to ensure a cross section of representation was not robust enough. For example: a survey would be expected as a legitimate method to define the public "market mix"	The BLM initiated the scoping process with the publication of the June 2003 NOI in the Federal Register. The scoping period lasted from June 4, 2003 to January 31, 2004. A mailing list for public scoping was developed. A website on the Moab RMP/EIS was continuously maintained throughout the planning process. Six open houses were held during the scoping

				(a very common definition and practice widely available in worldwide marketing arenas to narrow down the characteristics of a big group). Your reach was relatively small in the numbers of comments you received in comparison to the annual visitiation per year (1 million visitors with only approximately 6500 comments). This makes me suspect ineffective PR. I realize you sent out the press releases and PSAs etc. But were they effective and did they reach all interested public? For example. Although you had a meeting in Grand Junction, I do not see that you sent press releases or PSAs to other Colorado media, yet Colorado users are significant. Federal law specifically mentions that in land use revision plans adjacent states should be included. The number of visitors from Denver, Apsen, Durango, and other Colorado towns is significant. Wider representation from Colorado should have been included in the scoping. BLM had surveys available to them that would have helped them define “whothe public is” and did not use them. The National Visitor Use Monitoring Study conducted by MFO in 2006. Another survey was published in the Moab Times March, 2005. The Scoping document in the table of contents is not complete. I would specifically like to know how you address group comments as a percentage of the whole. I did not see this addressed in the scoping document.	period, and several planning bulletins were issued. The public was informed of the planning process through the media. The BLM attempted to include the public during the scoping process.

				Comments should be categorized in a more meaningful way. For example, on pg. 115, you list 110 letters from Moab open house that want the BLM to close mineral development on land with wilderness values and only 9 letters that want exploitation. I would like to see all comments expressed as a percentage of the whole. I would specifically like to know what percentage of the comments were in favor of preserving wilderness characteristics on wilderness character lands.	
Teri	Underwood	409		The DRMP does not adequately consider the total impact to the land from the combined destructive activities that it will permit (in particular: ORV routes, roads, and oil and gas leasing) and fails to determine the impact that the proposed travel plan will have on the land over the course of 10-20 years.	A systematic interdisciplinary approach was used to provide accurate, objective and scientifically sound environmental analysis on the environmental consequences associated with the management actions or prescriptions under each alternative. The best available data were used for travel planning analysis, including wildlife data from the Utah Division of Wildlife Resources and U.S. Fish and Wildlife Service. The analysis discloses the direct, indirect and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives. Alt C of the DRMP/EIS limits all OHV travel to designated routes, with the exception of 1,866 acres near the White Wash Sand Dunes. The analysis in Chapter 4 discloses the benefits to resources from this proposed action. In addition, Alt C does not designate over 2,500 miles of route. This action benefits both natural and cultural resources. Chapter 4 also analyzes the impacts from oil and gas development to natural resources. Cultural resources are protected by law.
D'ahna	Chalmers	412	1	The time frame for comments on such an important document being so short and our lives being so full and demanding, I would request that	See response to comment 124-1

				you grant an extension period for more comments to be submitted.	
D'ahna	Chalmers	412	2	Monitor and Merrimac Blues. Please close this unique, excellent and sensitive area to motorized use.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
D'ahna	Chalmers	412	3	Please close The Poison Spider Rim trail to motorized use.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
D'ahna	Chalmers	412	4	Please eliminate the user created road spurs that travel next to the Green River in Labyrinth Canyon – another area where noise impacts are extreme, echo loudly, and destroy the river experience.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
D'ahna	Chalmers	412	5	Please address the criss/cross of trails over the hills and ridges at Professor Valley.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
D'ahna	Chalmers	412	6	Please use your efforts to close the illegal UPS Trail. Keeping bicycles off is the first step. If the trail is not closed, motorcycles will follow.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

D'ahna	Chalmers	412	7	I urge you to close all trails, tracks, routes or roads on Mat Martin Point to any and all motorized use.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Tammy	Taylor	414	1	See Taylor Grazing Act: Title 43 Chapter 8A Sub Chapter I 315D: AUMs are for domestic livestock, not deer, bison, elk, and all other wildlife. stock, not deer, bison, elk, and all other wildlife.	While the Taylor Grazing Act provides for livestock use of BLM lands in terms of AUMs, the BLM also has other requirements, including providing habitat for wildlife. Vegetation can be allocated to livestock and wildlife. Section 102 of FLPMA requires that the “BLM provide food and habitat for fish and wildlife and domestic animals.” As used in this RMP, AUMs are used to reflect the forage and habitat requirements of livestock and wildlife using BLM lands. It is a reflection of the numbers of animals and the length of time they are on specific areas resulting in the need for a particular level of AUMs for their use.
John	Hauer	416	1	Permitting livestock to graze along the highway [Highway 128] poses a danger to our family, and to may of our friends and neighbors who also drive the River Road. And, as mentioned in the draft RMP, tens of thousands of vehicles travel that road. Some are tourists passing through the area, some are guests at the two guest restorts on the highway, and many are Moab residents who travel the scenic route on their way to and from Grand Junction, CO. Other vehicles that drive on the road include trucks taking supplies to the aforementioned guest resorts, tour buses, and rafting companies with busloads of customers (trailers in tow, heavily loaded with rafts) driving to the Colorado River put-ins at Westwater, Hittle Bottom and Onion Creek. Allowing grazing along any highway is dangerous	The BLM recognizes that ther are safety issues regarding cattle along Highway 128. In addition, the BLM recognizes that visual resources need to be protected along this National Scenic Highway. For this reason, the BLM proposes in Alt C (preferred alternative) of the DRMP/EIS to remove 1,467 acres from livestock grazing in the Professor Valley, Ida Gulch, and River Allotments. This would be accomplished by building a fence set back up to 2,000 feet from Highway 128.

				of both the cattle and the people traveling on the highway. It is especially hazardous on a narrow, windy, hilly, road with little to no shoulder, such as Hwy 128.	
John	Hauer	416	2	Suggestions regarding Alternative C: Build a livestock fence only on the southeast side of the highway, and do not permit grazing between the highway and the river. Build the fence only 1,900 feet from the highway on the southeast side instead of 2,000 feet, in order to compensate the permitee for lost grazing between the highway and the river. The red line on the attached map shows approximately where the fence would go if built 2,000 feet from the highway on the northwest side. The areas outlined in green on the map are the areas that would be available if a fence were built between the highway and the river, a very few acres in five widely dispersed areas. Advantages: Only one fence would have to be constructed. Livestock would not be permitted in the campground areas and raft put-ins at Onion Creek. The campground and put-ins at Hittle Bottom are already fenced. Since the grazing between the river and the highway would be fragmented into such small areas, it would appear to be more convenient for the permitee to have an equal amount of grazing added to the northeast side than to attempt to	The text in Chapter 2 of the PRMP/FEIS for Alt C has been changed to read: "A fence would be constructed along the southeast side of Highway 128 (set back to protect the scenic resources of the National Scenic Highway)".

				utilize the small parcels of the northwest side of the highway.	
Raymond	Butts	417	1	White Wash Sand Dunes: The suggested open area should be expanded to an easily identified boundary that allows a larger area to reduce impact in too small of an area. I would like to suggest the boundary to extend to the Ruby Ranch Roach on the west, Blue Hills Road on the north and Duma Point on the east.	See response to comment 123-35
Raymond	Butts	417	2	Exclusive Use Zones: These will create user conflict not eliminate it in a way it is suggested to be managed. Whereas an exclusive use zone allows cherry stemmed routes to pass through and give the idea to other users it is not allowed due to perceived blanket restrictions. Multiple route designations with proper signage would be a better way to go.	See response to comment 122-9
Raymond	Butts	417	3	A general policy of closing dispersed campsites without first determining a reason for it with the proper analysis is wrong.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision.
Raymond	Butts	417	4	The Copper Ridge should be combined with Thompson Trail.	See response to comment 122-29
Raymond	Butts	417	5	Lands with Wilderness Character: There is no justification for this process, once the 603 process was completed the agency was supposed to be done with this. The 603 process determined that 3.2 million acres were suitable for congressional consideration; the BLM should not be reviewing this yet again.	See response to comments 120-8, 121-10, 121-58, and 121-61.
John	Kennedy	418	1	Open riding must exist in the White Wash Area.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan

					based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
John	Kennedy	418	2	Each alternative is greatly lackin in “true” trail inventory. Several long standing routes were omitted and it is my understanding that miles of single track were not even inventoried. In an era of “closed unless marked open” management, how is this the right thing to do?	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
John	Kennedy	418	3	Implementation of any fee system MUST include the uses affected as well as the Recreational Fee Advisory Group.	See response to comment 123-10.
Peter	Tomka	419	1	I suggest BLM’s open area at White Wash in Alternatives C and D be expanded.	See response to comment 123-35
Peter	Tomka	419	2	The Final RMP must mandate full public involvement in the establishment and management of “restricted camping areas” or “controlled camping areas.” BLM’s maps are unclear as to whether or not the camp sites the public uses are going to be open or closed.	Public participation has been solicited throughout the land use planning process. No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsite closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Peter	Tomka	419	3	Yellowcat should be a SRMA.	See response to Comment 122-38
Peter	Tomka	419	4	We noted that some of the motorcycle trails are actually ATV trails.	See response to comment 120-90
Colin	Fryer	421	1	I am in favor of alternative C that includes a fence for highway safety, except that the recommended fence set back of 2000 is drastically too restrictive and would result in almost total loss of the grazing	The BLM proposes to build a fence set back up to 2,000 feet from Highway 128 in order to address safety issues regarding cattle along Highway 128 and to protect visual resources along the National Scenic Highway. See

				resource. A 2000 foot set back would take away practically all of the north side of the highway which is the best ½ of the allotment. In addition the south side of the highway is better grazing closer to the highway and the resource gets poorer as you head toward the south cliffs. The 2000 foot set back effectively eliminates a good 75% of the resource for grazing.	Response to comment 416-1
Terry	Rust	422	1	Increase opportunities in order to decrease impacts on a particular area.	This is not an answerable comment. Please check it out as to whether or not it is complete.
Terry	Rust	422	2	None of the Alternatives presented are acceptable as they stand, including the Preferred Alternative C, which mandates the unworkable and impractical management of camping and motorized travel. In addition, in all of the Alternatives, management for the White Wash Sand Dunes is fatally flawed and must be reconsidered.	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.
Terry	Rust	422	3	Alternative D fails to provide a true motorized focus.	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.
Terry	Rust	422	4	I am concerned that many of the restrictions in all of the Action Alternatives are simply not justified. The FEIS MUST clearly draw a logical and easily understood connection between the facts on the ground and the decisions made.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified.

					The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, [four] alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Moab DRMP/DEIS provides in comparative form the management actions associated with each alternative.
Terry	Rust	422	5	The White Wash Sand Dunes management plan is totally unacceptable and unworkable. The draft plan bans nearly all camping until the agency gets around to constructing a developed campground. Further, the agency would also implement a “fee system using individual Special Recreation Permits” although I do not find a timetable or fee structure included.	See response to comment 123-35 relating to enlarging White Wash Sand Dunes open area in Alt C of the Travel Plan for the DRMP/EIS. See also response to comment 120-83 concerning enlarging the White Wash area to accommodate dispersed camping. See comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes.
Terry	Rust	422	6	The proposed open area in Alternative C and D must be expanded. The current proposal is unworkable because it confines a huge amount of vehicle use into a very small area and the area’s boundaries are not well defined and cannot be easily identified on the ground.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Terry	Rust	422	7	Requiring fences around the cottonwood trees and “water sources” is both impractical and unnecessary. Further, please define the term ‘water source’ would this include ephemeral springs? What period? Would the fences be required on the off chance water could be sourced there or only during actual flow?	See response to comments 208-3 and 479-6.
Terry	Rust	422	8	The open area should be bounded by easily	See response to Comment 123-35. The BLM asserts

				identified geologic features, or preferably along boundary roads of Ruby Ranch Road on the West, Blue Hills Road on the North, and Duma Point/Ruby Ranch (back way) on the East. Because the open area boundary, as proposed will not be easily identifiable on the ground, and also because of easy access to the proposed “fee area” from all directions, it will make this proposal extremely difficult to enforce.	that the boundaries of the open area in Alt C (preferred alternative) can be adequately delineated for public understanding. Enforcement actions are administrative and do not require land use planning decisions.
Terry	Rust	422	9	A fee system should be implemented only with the full involvement of the Recreational Fee Advisory Council and affected user group.	See response to comment 123-10.
Terry	Rust	422	10	The FEIS should consider designating more ATV trails, especially between White Wash and Red Wash. I strongly encourage you to look at the proposal developed by Ride With Respect.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Terry	Rust	422	11	The Mill Canyon- Sevenmile Rim biking focus area should be redrawn as Mill Canyon-Tusher Rims in order to provide better terrain for pedaling.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Terry	Rust	422	12	The Final Plan should extend the South Spansih Valley Biking area further south toward Black Ridge.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Terry	Rust	422	13	Alternative D falls short of providing sufficient motorcycling opportunities. Since no single-track inventory was performed, the BLM should continue accepting data on existing routes, and consider	See response to comment 122-14

				them for inclusion, again, a meaningful decision cannot be made while data is incomplete.	
Terry	Rust	422	14	The Utah Rims single-track network should include at least 25 miles of additional routes, in order to be as complete as the Dee Pass network.	See response to comment 122-46
Terry	Rust	422	15	The Copper Ridge Motorcycle Loop should be combined with Thompson Trail in the final plan.	See response to comment 122-29
Ginny	Carlson	424	1	See Appendix P "The current BLM Land Use Planning Handbook (H-1601-1, 2005) states that land use plans must: "Identify decisions to protect or preserve wilderness characteristics…" By losing the identity of 82% of the land that BLM recognized had WC, please explain how BLM is following the dictates of this handbook. Certainly the 366,485 acres determined to have WC are "sliced and diced" in so many ways under the various other resource allocations, that this land will first lose its WC label and then lose it on the ground as it becomes just a part of a SRMA, IRMA, VRM category, grazing allotment, oil and gas exploration area etc.	See response to comment 124-53.
Ginny	Carlson	424	2	I recommend that the following areas be managed for wilderness characteristics: Hunter Canyon Hatch Wash Fisher Towers (alt C shows 5,540, however there are 17,235 acres with WC) Mary Jane (alt C shows 16,499 acres, however there are 24,779 acres with WC) Big Triangle Behind the Rocks Mill Creek (3,388 acres adjacent to Mill Creek WSA) Gooseneck Shafer Horsethief Labyrinth Westwater Canyon	The management and level of protection of the wilderness characteristics on non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Any non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the management prescriptions established in the RMP. These Non-WSA lands have many resource values and use in addition to wilderness characteristics. The DRMP/DEIS considered all available information and a range of alternative prescriptions for how these values and uses would be managed. See response to comment 124-53.

Ginny	Carlson	424	3	Since there do not appear to be any maps in the entire document to show the boundaries that MFO has decided to protect as WC and the areas that will not be retained as WC, I cannot determine reviewing the information provided whether there are any other user conflicts.	Volume 3 of the DEIS/RMP provides maps of non-WSA lands with wilderness characteristics (Maps 2-24-B and 2-24-C). Any areas not on the maps were judged by the BLM not to possess wilderness characteristics. Detailed maps of each of these areas are available on the Moab BLM planning website, under “background documents”.
Ginny	Carlson	424	4	See Table 4.74 Livestock Grazing Acres Available per Alternative.Please explain how BLM can have fewer acres per AUM in the conservation alternative B, than in the commodity alternative D. Does this table have the numbers backward, or are there erroneous calculations in the RMP?	The figures in Table 4.74 are correct: Under Alternative B, 1,668,731 acres are available for grazing, 153,797 acres would not be available for grazing, and 106,437 AUMs would be available. Under Alternative D, those figures are 1,770,314, 52,214, and 108,876, respectively. Thus Alternative D has more acres and AUMs available for grazing, and fewer acres unavailable than Alterative B. The relationship between acres available and AUMs, to which the commentor referred, is fewer under Alternative B is because Alternative has designated almost 200% acres more as being unavailable for grazing than Alternative D. This is consistent with the designation of Alternative B being the conservation alternative and Alternative D the commodity alternative.
Ginny	Carlson	424	5	What authority does BLM have under Federal Law to ignore the majority of the land users (hiking, horse, sightseeing in highway vehicles) in favor of a minority who drive off-road vehicles. What authority does BLM have under Federal Law to give locals much more say in the roads than the rest of the US citizens who equally pay taxes and should have an equal say in land management. What authority does BLM have to only take input on road decisions from the county whose representative openly consulted with 4x4 drivers while never consulting or asking for input from the quiet users, who are the majority of users in the MFO?	See response to comment 124-9
Robert	Lippman	425	1	The BLM’s present statewide effort, covering the long term management and destiny of over 11	See response to comment 124-1

				million acres of land, requires more time for study and detailed, informed comment. Indeed, representatives of widely differing and divergent interests have united in requesting an extension which was unjustifiably denied by the agency.	
Robert	Lippman	425	2	The Plan and preferred alternative contemplate significant changes in management that, far from providing a “balanced approach,” are tremendously weighted towards industrial/commodity development and motorized recreation access, all of which will have a significant if not devastating impact upon the health of the lands in issue, and upon wilderness values previously identified by the BLM.	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, [four] alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Moab DRMP/DEIS provides in comparative form the management actions associated with each alternative.
Robert	Lippman	425	3	The travel plan component, in blatant disregard of the agency’s own findings regarding lands determined to have wilderness character, and additionally in disregard of lands proposed for wilderness designation in the America’s Red Rock Wilderness Act, designates thousands of miles of roads for ORV and motorized access.	See response to comment 124-54
Robert	Lippman	425	4	Canyon Rims area south of the Hell Roaring Point Road should be protected from the present and proposed access by indiscriminate ORV use and RV-type recreation.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Robert	Lippman	425	5	Public opinion overwhelmingly supports non-motorized uses over ORV and mining/drilling access. Land use decisions must be science-based, pursuant to FLPMA and other standards,	See response to comment 122-9

				as opposed to commodity-based…	
Mark R.	Werkmeister	426	1	The BLM is no longer allowed to manage solely for supposed "wilderness characteristics."	See response to comments 120-8, 121-10, 121-58, and 121-61.
V.	Nuckas	427	1	Some of your formulated alternatives fail to provide motorized access. Please provide alternative that permits and maximizes all recreational uses in Alt D including motorized and non-motorized trails.	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.
V.	Nuckas	427	2	FEIS should include more ATV trails in White Wash and Red Wash	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Richard	Trow Jr.	428	1	BLM has forumalted three alternatives to create the appearance of fairness. Each seems to have a poison pill in it to force the acceptance of the "preferred alternative." Alternative D, the "pro-motorized" alternative is less friendly to the motorized recreationalists than the "preferred alternative."	The DRMP/EIS provides 4 alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping. The BLM acknowledges throughout the DRMP/EIS that Alternative B produces fewer adverse environmental impacts -- that is the expressed intention of that alternative. The BLM, however, is not required to choose the alternative which produces the least environmental impact, but must balance competing resources within its sustained yield, multiple use mandate.
Richard	Trow Jr.	428	2	The White Wash Open area is much to small.	See response to comment 123-35
Richard	Trow Jr.	428	3	Many washes in the 10 Mile area are being proposed for closure. They should be left open.	See response to comment 211-20
Richard	Trow Jr.	428	4	Extend [Utah Rims SRMA] to include Mel's Loop and beyond	See response to comment 122-39

Richard	Trow Jr.	428	5	Create a Yellowcat area SRMA	See response to Comment 122-38
Larry	Bullard and Family	429	1	Our first comment is the extensive amount of proposed changes that BLM is requesting comment on. We find this to be much too complicated for easy comment. We sincerely believe you are doing an injustice to the public comment period by including such a vast amount of data that needs independent documentation for comment. It would literally take pages and days of work to comment on our concerns on this vast proposal.	See response to comment 124-1
Larry	Bullard and Family	429	2	It certainly appears to be a shotgun approach instead of addressing specific management problems. Your public presentations clearly leave only Alternative A (do nothing) or C (as BLM sees it) as reasonable alternatives. Neither is satisfactory as a whole.	The DRMP/EIS provides 4 alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping. The BLM acknowledges throughout the DRMP/EIS that Alternative B produces fewer adverse environmental impacts -- that is the expressed intention of that alternative. The BLM, however, is not required to choose the alternative which produces the least environmental impact, but must balance competing resources within its sustained yield, multiple use mandate.
Larry	Bullard and Family	429	3	Our first concern is the designation of the Green River (Segment 5: Mile 91 below Ruby Ranch to Hey Joe Canyon) as a wild river. Our concern is that this designation opens the door to manage this short section of river differently from the rest of the Green River (I-70 Bridge to the National Park). We are greatly concerned that this will bottleneck or remove accessibility by imposing recreational use sanctions. This could wind up much like the Westwater Canyon Wild and Scenic River section. The Guides and Outfitters will have 90% of the	See response to comment 124-88.

				access (Commercial interests) and the public gets access by lottery. Jet Boat use and travel up and down stream could be restricted. That could effectively eliminate open public access under the guise of “Wild River Management.” We don’t see the “Wild” river designation based on the number of traditional uses by recreational and commercial boaters, the historic road build into June’s bottom, the trails into the river bluffs, and River Register Rock with all its inscriptions, etc. Segmented classification is unacceptable. This is a navigable river by law. It needs to me managed as such.	
Pete	Bruno	431	1	Management objectives that use such things as primitive recreation zones. Areas of critical concern, and so-called “areas with wilderness character create a de-facto Wilderness management is unlawful. Congress put a dead line on inventory and study for wilderness.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Pete	Bruno	431	2	Your open area at White Wash in Alternatives C and D must be expanded. The current proposal is unworkable because it closes the killer hill climb and camping area to the west of the Dunes.	See response to comment 123-35
Pete	Bruno	431	3	Requiring fences around the cottonwood trees and “water sources” is both impractical and unnecessary.	See response to comments 208-3 and 479-6.
Pete	Bruno	431	4	I support a policy where existing campsites are open unless closure was determined necessary via lawful public planning process. It is very important that the final RMP mandate full public involvement in any establishment and management of “restricted camping areas” or controlled camping areas.	Public participation has been solicited throughout the land use planning process; however the process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision.
Pete	Bruno	431	5	I looked at your maps and can’t tell if the campsites we use are going to be open or closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and

					120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Pete	Bruno	431	6	The Utah Rims SRMA should extend further southwest to encompass Mel's Loop and beyond.	See response to comment 122-39.
Pete	Bruno	431	7	Yellowcat is increasingly popular for four wheeling and ATV riding. Designating a SRMA there would utilize the dense network of mine roads that already exist.	See response to Comment 122-38
Pete	Bruno	431	8	Some of the "motorcycle trails" are actually ATV trails.	See response to comment 120-90
Barry	Powell	432	1	Management objectives that use such things as primitive recreation zones. Areas of critical concern, and so-called "areas with wilderness character create a de-facto Wilderness management is unlawful. Congress put a dead line on inventory and study for wilderness.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Barry	Powell	432	2	Your open area at White Wash in Alternatives C and D must be expanded. The current proposal is unworkable because it closes the killer hill climb and camping area to the west of the Dunes.	See response to comment 123-35
Barry	Powell	432	3	Requiring fences around the cottonwood trees and "water sources" is both impractical and unnecessary.	See response to comments 208-3 and 479-6.
Barry	Powell	432	4	I support a policy where existing campsites are open unless closure was determined necessary via lawful public planning process. It is very important that the final RMP mandate full public involvement in any establishment and	Public participation has been solicited throughout the land use planning process; however the process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision.

				management of “restricted camping areas” or controlled camping areas.	
Barry	Powell	432	5	I looked at your maps and can’t tell if the campsites we use are going to be open or closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
Barry	Powell	432	6	The Utah Rims SRMA should extend further southwest to encompass Mel’s Loop and beyond.	See response to comment 122-39.
Barry	Powell	432	7	Yellowcat is increasingly popular for four wheeling and ATV riding. Designating a SRMA there would utilize the dense network of mine roads that already exist.	See response to Comment 122-38
Barry	Powell	432	8	Some of the “motorcycle trails” are actually ATV trails.	See response to comment 120-90
George	Halterman	433	1	When riding our Jeep, we like to explore the many back roads and the “lower than 4 rated” Moab Jeep Safari trails. When we take our ATV/dirt bikes, we enjoy riding the White Wash Sand Dunes, 10 Mile Wash	See response to comment 206-11
George	Halterman	433	2	Your open area at White Wash in Alternatives C and D must be expanded. The current proposal is unworkable because it closes the killer hill climb and camping area to the west of the Dunes.	See response to comment 123-35
George	Halterman	433	3	Requiring fences around the cottonwood trees and “water sources” is both impractical and unnecessary.	See response to comments 208-3 and 479-6.
George	Halterman	433	4	I looked at your maps and can’t tell if the	No areas are closed to camping by action of the

				campsites we use are going to be open or closed.	DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
George	Halterman	433	5	The Utah Rims SRMA should extend further southwest to encompass Mel's Loop and beyond.	See response to comment 122-39.
George	Halterman	433	6	Yellowcat is increasingly popular for four wheeling and ATV riding. Designating a SRMA there would utilize the dense network of mine roads that already exist.	See response to Comment 122-38
George	Halterman	433	7	Some of the "motorcycle trails" are ATV trails.	See response to comment 120-90
Shelley	Pistorius	436	1	You must restrict OHV use to designated roads and trails. There should be no "open" areas and all routes through riparian areas and other ecologically damaging routes should be off-limits.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Christian	Brunner	437	1	Ruby Ranch / White Wash Sand Dune area must be kept open.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
R. Lance	Wade	457	3	Requiring fences around the cottonwood trees and "water sources" is both impractical and unnecessary. We strongly oppose this provision of	See response to comments 208-3 and 479-6.

				the draft plan.	
R. Lance	Wade	457	4	We oppose the fee system contemplated in Alternatives C and D. Fee systems are inherently controversial and often unpopular with the recreating public. The Final RMP should not require a fee system; however, we are willing to support funding for infrastructure if needs cannot be met with existing funding and grant programs, but not with an “individual Special Recreation Permit” program.	See response to comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes. See response to comment 123-26, as well as comments 122-22, 124-11, 124-112 , and 124-110 regarding clarification of SRP policies.
R. Lance	Wade	457	5	Additionally, it is impossible to tell from examination of your maps whether the campsites we use are to be closed or are to remain open.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern.
R. Lance	Wade	457	6	The Utah Rims SRMA should extend further southwest to encompass Mel’s Loop and beyond.	See response to comment 122-39
R. Lance	Wade	457	7	Yellowcat is increasingly popular for fourwheeling and ATV riding and is one of the areas that we enjoy. Designating a SRMA there would utilize the dense network of mine roads that already exist.	See response to comment 122-38
R. Lance	Wade	457	8	Some of the “motorcycle” trails are actually ATV trails.	See response to comment 120-90
Ryan	Westwood	467	1	Management objectives that use such things as primitive recreation zones, areas of critical environmental concern, an so-called areas with wilderness character to create a de-facto wilderness management is unlawful. Congress put	See response to comments 120-8, 121-10, 121-58, and 121-61.

				a deadline on inventory and study for wilderness. The BLM should no longer be allowed to manage solely for wilderness character.	
Ryan	Westwood	467	2	Your open area at White Wash in Alt C and D must be expanded.The current proposal is unworkable because it closes the killer hill climg and camping area to the west of the Dunes. Such as small area, confines a huge amount of vehicles use into a very small area and the area's boundaries are not well defined and cannot be easily identified on the ground.	See response to comment 123-35 regarding expansion of White Wash.
Ryan	Westwood	467	3	Requiring fences around the cottonwood trees and water sources, is both impractical and unnecessary. We strongly oppose this provision of the draft plan.	See response to comments 208-3 and 479-6.
Ryan	Westwood	467	4	We oppose the fee system contemplated in Alts C and D. Fee systems are inherently controversial and often unpopular with the recreating public. The final RMP should not require a fee system. However, I am willing to support funding for infrastructure if needs cannot be met with existing funding and grant programs, but not with an "individual special recreation permit" program.	See response to comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes. See response to comment 123-26, as well as comments 122-22, 124-11, 124-112, and 124-110 regarding clarification of SRP policies.
Ryan	Westwood	467	5	We oppose camping policy as outlined in App E. I support a policy where existing campsites are open unless closures was determined to be necessary via a lawful public planning process. The Final RMP must mandate full public involvement in any establishment and management of "restricted camping areas" or 'controlled camping areas"	Public participation has been solicited throughout the land use planning process. No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. .
Ryan	Westwood	467	6	I looked at your maps and can't tell if the campsites we use are going to be open or closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural

					resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions. The commentor has not provided any information regarding specific campsite locations of concern
Ryan	Westwood	467	7	Utah Rims SRMA is necessary to properly manage this popular area. It should have a motorized and mountain bike focus, and include the ability to designate or construct routes should they be needed in the future. The Utah Rims SRMA should extend further southwest to concompass Mel's Loop and beyond.	See response to comment 122-39.
Ryan	Westwood	467	8	Yellowcat is increasingly popular for 4 wheeling and ATV riding. Designating a SRMA there would utilize the dense network of mine roads that already exist.	See response to Comment 122-38
Ryan	Westwood	467	9	Some of the "motorcycle trails" are actually ATV trails. We support the recommendation of the Utah State Parks onwhich should be open to ATVs.	See response to comment 120-90
Will	Gouer	469	1	Hell Roaring Canyon is in no way a viable road in my eyes or in those of whom are with me. To include this, among many others illogical roads does nothing but ask for a degradation of the area in the near future. Please, take time to check out "roads" in the plan in person, see which ones truly need to be designated as such and eliminate the numerous redundant pathways to pointless dead ends that many create.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Roger	Crockett	470	1	We are in crisis mode with the overuse of C02 and shortage of fuel causing intense pollution. At present clear days are rare, usually only after snow or rain. The air quickly becomes polluted again. We don't know yet the extent of the damage Done by OHVs and pollution.	See responses to G-479-21 and G 479-3 regarding emissions from OHV use and global warming issues, respectively.

Jim	Bulkeley	471	1	The DEIS/DRMMP did not address any meaningful mitigation plans to mitigate the loss of existing motorized routes. The plans should be withdrawn and revised to include measures to mitigate loss of any recreational opportunities.	See response to comment 122-9
Jim	Bulkeley	471	2	Proposal to allow vehicle camping only in designated campsites in all areas of the FO is overly restrictive and should be abandoned. By closing carious areas to camping have found other new areas to camp, resulting in more disturbed areas. Some of the areas BLM has designated as Open to Camping are next to railroad tracks and in close proximity to highly traveled roads. Not very desirable locations. I am strongly opposed to the camping policy outlined in App E.	See response to comments 123-8. Dispersed camping is allowed on over 95% of the Moab planning area. See response to comment 120-86 regarding vehicular access to dispersed camping sites. One of the express purposes of leaving a route open for travel was to provide access to a campsite. If roads to specific dispersed campsites have been omitted in the Travel Plan, they may be added at a future date through site-specific NEPA analysis.
Jim	Bulkeley	471	3	Due to the growing numbers of people who enjoy the motorized recreational opportunities Moab has to offer, more areas should be opened to motorized recreation the policy of closing areas only increases the impacts to the remaining open areas. More people, less area equals more impacts to these areas.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Jim	Bulkeley	471	4	Gemini Bridges: The road allowing access to drive across the bridges should remain open. This is the only place in Utah--maybe the world--where you can drive across a large natural bridge. This unique driving experience should remain open. If people desire the experience to viewing natural bridges with out vehicles driving across them, they merely drive a few miles to Arches National Park, Bridges national monument and numerous other arches/bridges in the area.	See response to comment 206-14
Jim	Bulkeley	471	5	Please add the following to your proposal: to reduce traffic conflict and increase motorized opportunities, a motorized route should be designated between upper end of Mine Sweeper Road and Cliff Hanger Road. I would be glad to	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to

				assist in the route selection.	resources. This action would be based on monitoring and site specific NEPA analysis.
Tyler	Kokjohn	474	1	Travel plan says BLM is required to follow a non-impairment standards with regard to management of WSA tracts. The preferred alternative proposes managing roughly 20% of the areas acknowledged as having wilderness character. This seems out of line with the expressed non impairment mandate.	The non-impairment mandate applies only to WSAs, and not to non-WSA lands identified as possessing wilderness characteristics.
Tyler	Kokjohn	474	2	Transportation plan seems to present alternatives that in ways do not vary much. For example, the total open route mileage varies between 2,144 for the most conservation -oriented alternative to 2,671 for the least.	The least conservation-oriented alternative for travel is Alternative A, which has 5,033 miles of "D" Road (the two figures provided by the commentor refer to "D" roads for Alts. B and D). The BLM therefore presents a range of alternatives in route designation of 2,889 miles difference between Alts. A and B.
Tyler	Kokjohn	474	3	Allowing too many OHV routes in tracts that BLM has inventoried and acknowledged to possess wilderness characteristic would undermine active Congressional legislation to formally designate and permanently protect portions of BLM areas within the Red Rock Wildness.	See response to comment 124-53.
Tyler	Kokjohn	474	4	Allowing OHV routes within areas of wilderness character would put irreplaceable cultural resources at risk of destruction and looting. The clear mandate to the agency is to protect and preserve these resources for future generations.	Each of the 33,000 routes was evaluated for its possible impacts to cultural resource, using Class I inventory methods. Many routes were deleted from Travel Plan alternatives due to conflicts with cultural resources. Archaeological damage violates Federal law. Violations of law are beyond the scope of the land use plan under consideration. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The analyses that will provide the rationale for the final decision to designate or not designate an ACEC can be found in Chapter 4 of the PRMP/FEIS. See also response to comments124-68 and 124-82. Archaeological damage violates Federal law. Violations of law are beyond the scope of the land use plan under consideration.

Tyler	Kokjohn	474	5	The draft plan proposed to take cultural resource inventory and assessments for areas subject to development-great idea, since so little inventory data is on hand to inform decisions. Unfortunately the preferred alternative includes only 60% of the total acreage potentially in play for assessment. It is unclear why the most conservation-oriented alternative would propose more inventory and assessment be performed in the face of markedly less potential development threat. The amount of cultural resources inventory and assessment must be commensurate with the threat and I urge BLM to be certain the final plan will allow for such activities to be performed at the scale necessary to ensure archaeological assets are safeguarded.	The commentor is assumed to be referring to the spread, by alternatives, of cultural field inventory. A larger acreage is prioritized for cultural field inventory in the conservation alternative because the BLM is proposing a pro-active, conservation oriented alternative. Alternative D emphasizes commodity production. While the laws protecting cultural resources must be followed in implementing all actions, Alternative D is less concerned with a pro-active conservation approach. Cultural resource inventories will be undertaken in response to the development proposal. Thus, the prioritization of cultural field inventories fits the theme of each of the action alternatives.
Ann	Phillips	477	1	When excavating a site, archaeologists leave a large portion of the site unexcavated, saving it for a future time when techniques improve and more data can be gathered. The BLM is charged with protecting these archaeological sites for perpetuity. The archaeological sites including Carrier Canyon rock art sites in Upper Courthouse Wash, Canyon Rims, and Westwater Canyon are well known and priceless. With easy access, the sites will be disturbed and in some cases, destroyed. It is imperative for the BLM not to let any more motorized roads into areas that are known to be rich inn archaeological sites. Correlation between public access and graffiti is well known and has been documented.	Each of the 33,000 routes was evaluated for its possible impacts to cultural resource, using Class I inventory methods. Many routes were deleted from Travel Plan alternatives due to conflicts with cultural resources. Archaeological damage violates Federal law. Violations of law are beyond the scope of the land use plan under consideration. See response to comment 1-3.
Ann	Phillips	477	2	The areas between Hey Joe Canyon, and Bowknot Bend via Spring Canyon and Hell Roaring Canyon and Mineral Canyon in the Green River coridor, Tenmile Canyon, Hell Roaring Canyon, Horsethief Point, Deadman Point, Tenmile Point, Hatch Point, Beaver Creek area, or Goldbar Rim need to remain roadless until detailed	See response to comment 124-48. The BLM is not required to create roadless areas where none exist. See also response to comment 1-3 concerning the designation of routes.

				surveys can be done. The BLM needs to do those surveys carefully and thoroughly before designating and allowing new roads in those areas.	
Bob	Greenberg	484	1	I recently hiked the proposed motorized travel route from where Dubinky Wash crosses the county road to Spring Canyon (near Jug Rock Flat) to its confluence with Hell Roaring Canyon. There is no evidence of human activity in Dubinky Wash except for a couple of claim markers that appeared to have been dropped from aircraft as they displayed no evidence of having been hammered or otherwise anchored into the ground. The wash bottom is pristine and allowing travel up it does not appear to serve any actual purpose while destroying a significant opportunity for back-country hiking/non-motorized recreation and solitude. This route and all travel up Hell Roaring above the school section should be eliminated from the travel plan no matter what alternative is adopted.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Bob	Greenberg	484	2	In addition, the map for Alternatives C & D show a short route immediately to the south of the confluence of Hell Roaring and Dubinky Wash and going about .5 miles above Hell Roaring onto the sand dune before it turns north and dead ends. This appears to be a relict uranium-prospecting tract that has not been used in decades. It appears to have no purpose and should be eliminated from the travel plan no matter what alternative is adopted.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Bob	Greenberg	484	3	I recently explored Ten Mile Wash are by four-wheeled drive vehicle and on foot. Ten mile Wash below the midway cut off should be closed to motorized travel. This out-and-back section of the proposed route serves no apparent purpose and compromises an area with outstand opportunities	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring

				for hiking and solitude. Limiting the motorized access in Ten Mile to the area above (and including) the fun midway cut off route would preserve a trail that is great for motorized recreation and the wonderful area below midway for hiking and non-motorized recreation. As the only purpose for keeping Tem Mile below the midway cut off open to motorized recreation is for the purpose of motorized recreation itself, this would be an appropriate comparison between motorized recreation and non-motorized uses. There does not appear to be any other purpose or need for motorized access into lower Ten Mile.	and site specific NEPA analysis.
Bob	Greenberg	484	4	This past winter I had the occasion to hike from the northwest end of Castle Valley via the “Golden Stairs” route to the Big Bend area on the river by several different routes. In doing so I noticed several discontinuous “road” segments on top of Mat Martin point north of the Porcupine Rim Bike Trail. Alternatives C & D propose to allow motorized recreation in this area, presumably via these remaining pieces of road. This use should be eliminated as the entire Mat Martin Point area has outstanding value for non-motorized recreation. The quiet, solitude and amazing views and hiking routes down to the river make this area ideal for non-motorized use. The use of the Porcupine Rim bike trail does not disrupt this. Given the great difficulty of following the old roads, let along driving them and the lack of any real purpose for keeping them open, non-motorized use for this area should be preserved no matter what alternative is adopted.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Jaclyn	West	490	1	BLM’s analysis does not adequately account for its treatment of non-WSA lands with “wilderness characteristics” (Sections 3.9, 3.11, 3.15, 4.3.84.3.10, and 4.3.14). BLM’s preferred	See response to comments 120-8, 121-10, 121-58, and 121-61.

				Alternative C, thus, does not comply with FLPMA's multiple use principle. As explained in further detail below, protection of ACECs and non-WSA lands with "wilderness characteristics" for alleged wilderness properties violates "multiple use." BLM should select portions of alternatives that protect the environment, yet fully comply with the development of resources under multiple use principles.	
Jaclyn	West	490	2	Wilderness Inventories Under FLPMA – The Moab RMP contains analysis of non-WSA lands with "wilderness characteristics: although the lands are neither defined in FLPMA nor given any definition in any federal statute or regulation. BLM has no formal guidance of these areas. BLM is under no duty to protect these lands or provide them with special protections beyond any other public lands. The RMP/EIS should explain under what specific authority BLM is using to provide specific protection for non-WSA lands with "wilderness characteristics," because I am unaware of any. BLM's statements regarding SUWA v. Norton decision are of no support because that was purely NEPA supplementation issue. From the EIS, it appears that BLM accepted submissions from the Southern Utah Wilderness Alliance and accepted their assertions regarding whether lands contained wilderness characteristics. If BLM intends to protect these areas as if they were WSAs, those decisions should be done through the public process as was the WSA process completed in the 1980s and 1990s. BLM did not take into account existing oil and gas leases, grazing allotments, and other factors that would impact so called "wilderness characteristics." If BLM plans to restrict multiple	See response to comments 120-8, 121-10, 121-58, and 121-61.

				use of these non-WSA lands with “wilderness characteristics,” it must make the decisions of which areas are so designated available to public scrutiny and comment. FLPMA directed the Secretary of the Interior to inventory roadless lands of 5,000 acres or more for their wilderness characteristics within 15 years from October 21, 1976. 43 USC § 1782. The Secretary was to recommend to the President which areas should be studied for protection as wilderness by July 1, 1980. These “wilderness study areas” (“WSA”) would be managed so as not to impair their suitability as wilderness pending further action by Congress. Following his study, the Secretary was to submit his recommendations to the President, who in turn would submit recommendations to Congress. Id. The process of designating WSAs in Utah had three parts. First, BLM conducted an initial inventory to decide which areas would be fully reviewed for their wilderness values. BLM published its findings in the BLM Utah Initial Wilderness Inventory. Utah; Initial Wilderness Inventory, Final Decisions and Official Start of Intensive Inventory, 44 Fed. Reg. 4651 (Aug. 8, 1979). Second, BLM conducted a more intensive review of the lands that it included in the initial inventory to “determine whether they are in fact of wilderness character.” Id. at i. This intensive inventory resulted in the determination of what land should be studied as WSAs. Utah Final Wilderness Inventory Decision, 45 Fed. Reg. 75602 (Nov. 14, 1980). Third, in 1991, Secretary Lujan recommended that approximately 1.9 million acres in Utah should be included as part of the	

				National Wilderness Preservation System. Utah Statewide Wilderness Study Report at 3. On June 29, 1992, President Bush presented this recommendation to Congress. See Letter to Congressional Leaders Transmitting Proposed Legislation on Utah Public Lands Wilderness Designation. In the late 1970s, as part of the first step, BLM initially inventoried the areas in the Moab Resource Area that now include the WIAs and citizen wilderness proposals. BLM determined that several of these areas would not be inventoried any further. Utah Final Wilderness Inventory Decision at 35-41. 1 Second, after a further inventory, BLM decided not to include 24 areas in the Moab resources area as WSAs. BLM Intensive Wilderness Inventory, Final Decision on Wilderness Study Areas at 223-349 (Utah 1980). 2 The IBLA affirmed BLM's decisions and consistently held that these decisions are administratively final and that BLM's authority to establish new WSAs has expired. SUWA, 151 IBLA 338, 342 (2000); SUWA, 128 IBLA 52, 65-66 (1992) ("final administrative decisions relating to the designation of lands as WSAs in Utah were completed in the 1980s…the lands in question were not included in a WSA. Therefore, BLM may administer them for other purposes, including the approval of drilling for oil and gas.") (internal citations omitted). Furthermore, the Board has also held that BLM need not protect these areas as if they are WSAs of give them any added protections. See SUWA, 163 IBLA 142 (2004) (BLM approval of EA/FONSI for ROW and approximately 60 acres of surface	

				disturbance in Desolation Canyon WIA affirmed). Any protections of these areas under the non-impairment standard violates BLM's multiple use mandate. See 43 USC § 1701 (a)(7), (8) & (12); 43 USC § 1732 (a) & (b); 43 CFR § 1610.5-3.	
Jaclyn	West	490	3	Continuing Inventory Requirement for Land Use Planning – I am very concerned about the proposal to manage so-called "non-Wilderness Study Area (WSA) lands with wilderness characteristics" to maintain those "wilderness" values. There is no justification and no mandate in the FLPMA and no process requirement for engaging in an ongoing Wilderness inventory and review. Once the "603 Process" was completed, the agency was done with its Wilderness review. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so would obviate the FLPMA mandate, USC § 1702 (c) ("Section 103(c)"), of multiple use and result in a loss of economic development in the local community and a denial of energy resources for the state and nation. Section 201(a) of FLPMA provides that "the Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values…" 43 USC § 1711 (a). The purpose of keeping this inventory current is "to reflect changes in conditions and to identify new and emerging resources and other values." Id. While BLM has a duty under section 201 to inventory lands, including those that may contain	See response to comments 120-8, 121-10, 121-58, and 121-61.

				"wilderness characteristics," BLM may not unlawfully apply the WSA non-impairment standard to any of those lands found to contain wilderness characteristics. State of Utah v. Norton, 96-cv-870, (D. Utah), Stipulated Settlement at ¶¶13, 17. The requirements to inventory and protect are distinct. BLM must still provide for multiple use even if certain lands contain what BLM considers to be the elements of "wilderness." Furthermore, containing elements and properties of "wilderness" is entirely distinct from meeting the statutory definition of wilderness under the Wilderness Act. The decision to designate WSAs, the treatment of land s under the non-impairment standard, and designation of lands to include in the National Wilderness Preservations System are not proper decisions that BLM can make during the land use process. BLM must continue to provide for multiple use for lands outside WSAs. BLM should strike the wilderness characteristics areas as unlawful and abide by the final agency decisions made during the FLPMA wilderness inventory process, explained above, and completed in the 1990s. These 1996-1999 Re-inventories were not made as part of section 201 of FLPMA and were designed to create new WSAs. Any creation of new WSAs, the treatment of lands under the non-impairment standard, or creation of de facto wilderness areas through the RMP process is unlawful. BLM has failed to provide any data or information on the "wilderness characteristics" areas and how many people actually use these areas for these purposes. It is one thing to claim that an area has "outstanding opportunities for primitive and	

				unconfined recreation," but it these places are not actually seeing recreation, why designate them as such. If BLM is going to protect non-WSA areas for their alleged wilderness characteristics—which as explained above is unlawful and in violation of multiple use—it must provide specific information on why these lands are of "wilderness character." BLM originally determined that they were not eligible for consideration to be included in the National Wilderness Preservation System, so any further management of these areas for the sole protection of "wilderness characteristics," must provide specific reasons for such.	
Jaclyn	West	490	4	BLM has already agreed through the settlement of the lawsuit brought by the State of Utah over the 1999 Unlawful Re-inventory that it will not create any new WSAs or protect any areas under the non-impairment standard. By closing all or part of Mary Jane Canyon, Fisher Towers, and Beaver Creek areas to oil and gas, grazing and other types of development, BLM is violating its FLPMA obligation of multiple use. BLM proposes to create three wilderness characteristics areas (Mary Jane Canyon, Fisher Towers, and Beaver Creek) that would be almost entirely closed to oil and gas leasing. These three "wilderness characteristic" areas were originally citizen wilderness proposals and were part of BLM's 1996-1999 reinventory. Additionally, BLM's use of cherry-stems to exclude man-made imprints to establish "wilderness characteristics" areas violates the purpose of The Wilderness Act and restrictions of access and multiple use of these areas violates FLPMA's principles. While cherry-stemming is a practice long recognized by the BLM, it truly contradicts the spirit of the Wilderness Act. BLM's use of cherry-	See response to comments 120-8, 121-10, 121-58, and 121-61.

				stems to gerrymander the boundaries of wilderness areas-exclusion of roads, fences, well-pads and other human imprints—in establishing non-WSA areas that do or may contain wilderness characteristics undermines the purpose of the Wilderness Act and the National Preservation Wilderness System. It is hard t imagine how one could truly feel alone and in an area “untrampled by man,” when you have your back to a road, well-pad or other intrusion that has been “cherry-stemmed” from a “wilderness area.” Wilderness areas and any other area that BLM considers that possess “wilderness characteristics” should truly be 5000 acres of continuous lands and not areas that are cherry-stemmed on all sides.	
Jaclyn	West	490	5	The Reasonable Foreseeable Development (RFD) scenario for oil and natural gas development within the planning area is inadequate. The Preferred Alternative projects 435 wells in the next 15 years. Rather than relying on outdated USGS data, the RFD should be based on 3-D seismic activity in the area and the current level of APD activity. APD activity alone suggests the fifteen-year RFD should be 975, based on 2006 data of 65 APDs. With respect to oil and gas resources, BLM Manual 1624, Planning for Fluid Minerals, specifically directs BLM not only to identify which areas would be subject to different categories of restrictions as included in the DRMP/EIS, but also to show that the least restrictive lease stipulation that would offer adequate protection of a resources has been selected. BLM failed to provide this critically important analysis in the planning document. This omission is of critical concern because it demonstrates that BLM has not carefully considered the effect of restrictive	See response to comments 214-1 and 124-95 regarding the RFD and MPR. The RFD scenario is an analytical model, which estimates oil and gas activity that could potentially occur. The RFD scenario is a reasonable technical and scientific approximation of anticipated oil and gas activity based on the best available information, including the potential for oil and gas resource occurrence, past and present oil and gas activity in conjunction with other significant factors such as economics, technology, and physical limitations on access, existing or anticipated infrastructure, and transportation. The RFD is purely an estimate; it is not a decision document nor does it establish a limiting threshold for future Federal leasing, exploration, or development activities. Rather, it is a scenario or projection of actual and hypothetical oil and gas activities based on the specific circumstances or constraints associated with each alternative and corresponding mitigation measures. This hypothetical framework focuses the impact analysis

				lease stipulations or permit conditions of approval (COA) on current and projected future oil and gas activities in the area. Given the fact that the plan will be used to make future decisions on activities, this lack of analysis is a fatal flaw.	associated with oil and gas leasing. Because the calculations are based on variables or factors that are difficult to accurately determine, the projection of oil and gas wells can vary greatly. These variables or factors include the price of oil and gas, the success or failure of exploration in unproven areas, and the willingness of investors to invest their money in risky exploration for oil and gas in unproven areas. As project-specific drilling operation are being considered, the BLM performs a land use plan conformance review and determination of NEPA adequacy. If conditions change, the BLM may need to reconsider the land use plan decision and perform further NEPA analysis in either an environmental assessment or an environmental impacts statement
Diane	Orr	492	1	The law encourages the BLM to be proactive in the protection of cultural resources. The National Historic Preservation Act directs the BLM to do inventories, actively manage and nominate sites for historic registration. Overall, this Management Plan is not proactive. It does not carry out the spirit of Preservation Act, Section 110. Instead of using field inventories, you are basing decisions on archeological density averages. You are relying on Section 106 of the Preservation Act almost entirely. Even Alternative B fails to offer cultural resource protection, but it is the best in the plan. I urge you to select B and do the intensive field inventory work necessary to make the decisions you have prematurely made in other alternatives.	National Register nomination is done on a site-specific basis and does not require a land use plan decision. The prioritization of National Register nominations has been removed from the PRMP/DEIS. A full cultural inventory is not required for a land use plan. Washington Office Instruction Memorandum 2007-030 states that a Class III inventory is not required for the designation of existing routes. Furthermore, FLPMA states that in the development and revision of land use plans the BLM should rely on the inventory of the public lands, their resources, and other values, to the extent such information is available. All cultural resources are protected by law, regulation and policy. The commentor's preference for Alt. B is noted.
Diane	Orr	492	2	We believe that the BLM has done a poor job of cultural resource management associated with this RMP. We are especially concerned with the use of computer modeling to determine cultural resource	In accordance with the BLM Land Use Planning Handbook (1601.1), a Class I cultural survey was conducted. the cultural model was developed by a BLM professional archeologist. The model identified high,

				locations. “A limited percentage of lands within the MPA have been physically inspected for the presence of cultural resources, and such an effort is cost-prohibitive as part of preparing the RMP. Therefore, the relative site density potential for areas within the MFO was estimated using environmental factors known to influence site location and type. All areas of the MFO were then ranked as having high, medium, or low potential for containing cultural sites.” (Page 3-19) This problematic approach does not acknowledge that people and their archaeological footprint are not entirely predictable. We recognize that complete surveys have not been done. However, there has been extensive documentation of cultural resources. “The MPA has approximately 5,200 inventoried cultural sites.” (Page 4-253) It is not clear to us that these actual site locations have been given consideration in the RMP. The RMP is bereft of information regarding the amount of protection that will be provided to cultural resources. Pages 2-2 through 2-6 provide helpful information regarding the coverage of Off-Highway Vehicle designations, Special Recreation Management Areas, Oil and Gas Leasing and Development, River Classifications, Wildlife, and Wilderness under the various proposed alternatives. No information is provided for cultural resources. There is no way to determine what percentage of the modeled high, medium, or low site probability acreage (Table 3-7, Page 3-19) is covered by an ACEC or special management consideration. Nor is there any way to determine	medium, and low site densities and this information was used to quantify the impacts. The model was tested by intersecting 4,259 known cultural sites with the probability coverage in GIS. The DRMP/EIS states on pg. 4-30 "while the site density prediction model used in this analysis is by no means a perfect predictor of site density it is sufficiently accurate (73% success rate) to be utilized as a tool for analyzing potential relative involvement of cultural resource sites in management decisions. A full cultural inventory is not required for a land use plan. Washington Office Instruction Memorandum 2007-030 states that a Class III inventory is not required for the designation of existing routes. Furthermore, FLPMA states that in the development and revision of land use plans the BLM should rely on the inventory of the public lands, their resources, and other values, to the extent such information is available. The BLM will continue to enhance the inventory and density techniques for high cultural value areas identified in the final plan. The number of identified cultural sites has been corrected on p. 4-253. There are approximately 4,200 cultural sites in the Moab planning area. All cultural sites are protected by law. An ACEC designation is not required to protect cultural sites. Three areas are proposed for ACEC designation in the preferred alternative for the relevant and important value of cultural resources: Behind the Rocks (5,201 acres), Mill Creek Canyon (3,721 acres) and Ten Mile Wash (4,980 acres). All three of these proposed ACECs have a concentration of cultural resources.

				how many of the 5,200 inventoried cultural sites are protected. We strongly encourage the BLM to do a better job of managing and protecting cultural resources in the development of future regional management plans.	
Diane	Orr	492	3	Development – We are concerned with development near rock art sites. Allowing camping, roads, oil and gas, and mining near rock art sites is a concern to us. It is clear to us that the greater the number of people that have access to a site, the higher the probability that the site will be vandalized. Unless sites are actively managed and hardened for visitation we suggest that development be kept away from most rock art sites.	Each of the 33,000 routes was evaluated for its possible impacts to cultural resource, using Class I inventory methods. Many routes were deleted from Travel Plan alternatives due to conflicts with cultural resources. Cultural Class III inventories would be required for all new roads and trails. Under Management Common to All Action Alternatives (page 2-7), camping would be prohibited and posted within or on archaeological and historic sites eligible for listed on the NRHP. All land disturbing activities within Traditional Cultural Properties would be designed to avoid or minimize impacts, where reasonable. Proposed projects or actions would be modified to avoid the area or site, avoid time of use by native American groups, or would be eliminated altogether. Archaeological damage violates Federal law. Violations of law are beyond the scope of the land use plan under consideration.
Diane	Orr	492	4	Behind the Rocks – We strongly advocate an ACEC oriented to archeological protection designation for the entire 17,836 acres included in this area because of the high archeological site density in the area and the potential for inclusion on the National Register of Historic Places as an Archaeological District. Rock art in this area is extensive, from multiple cultures over thousands of years, and is acknowledges as being of national significance. We believe all roads should be closed beyond the existing spur road to “Old Folks Home.” Additional	The commentor's preference for the Behind the Rocks ACEC designation as outlined in Alternative B is noted. The difference between the area of the ACEC in Alt B and Alt C is that Alt C removes the acreage within the WSA. The Behind the Rocks WSA is managed according to the Interim Management Policy for Lands Under Wilderness Review. The road beyond the “Old Folks Home” is closed to motorized vehicles in Alt C of the DRMP/EIS. Refer to response to comment 124-69.

				protection as described in alternative B (page 2-33) is appropriate.	
Diane	Orr	492	5	Bookcliffs – From a cultural resource point of view, we believe that there is a middle ground between alternatives B and C that is appropriate. Alternative C does not establish an ACEC in the Bookcliffs. Alternative B would manage 304,252 acres. Cultural resources are primarily located along the Green River, the base of the Book Cliffs, and in major drainages from the highlands of the Bookcliffs. We advocate the establishment of an ACEC oriented to archeological protection in these more restricted areas of Alternative B. Specifically, the entire Green River corridor, East Canyon, Middle Canyon, Hay Canyon, Spring Canyon, Crescent Junction, Sego Canyon, Thompson Canyon, Coal Canyon, and Tusher Canyon. The current maps appear not to include the rock art at Crescent Junction. These are significant sites and should be included.	The commentor's preference that an ACEC be established to protect archeological resources for the Green River corridor, East Canyon, Middle Canyon, Hay Canyon, Spring Canyon, Crescent Junction, Sego Canyon, Thompson Canyon, Coal Canyon, and Tusher Canyon is noted. All archeological sites are protected by law whether or not they are included in an ACEC. See response to comment 124-68 and 124-69.
Diane	Orr	492	6	Highway 279 / Shafer Basin / Long Canyon – We find Alternative C to be an acceptable alternative from a cultural resource viewpoint except that the map appears to exclude “Wall Street” rock art district from the ACEC. We believe that it is important for the entire river corridor including “Wall Street” to be protected in an archeologically focused ACEC. For the past two years URARA (Utah Rock Art Research Association) has been working in cooperation with the MFO archaeologist for the BLM to document the sites along “Wall Street” with the objective of nominating it to the National Register. We would like to see this project continue when a new archeologist is named for the district. The “Wall Street” area receives high visitation and should be managed to minimize visitor impact and to provide interpretation and	The Wall Street rock art district is contained within the ACEC boundary in Alt C (the boundary does not differ between Alts B and C for the Highway 279/Shafer Basin/Long Canyon ACEC. National Register nominations can be done at any time; they are not a land use planning issue.

				education.	
Diane	Orr	492	7	Canyon Rims – The BLM recommendations for the Canyon Rims potential ACEC says that the area qualifies for an ACEC but Alternative C does not include this area as an ACEC. Which is a bit confusing. It is difficult to determine the boundaries of this district from the maps provided. However, we are concerned that it includes Lockhart Basin which has documented archaic archeological sites. Alternative B provides no cultural resources protection. We would like to see cultural protection in the Lockhart Basin portion of this district.	The commentor's preference that the Canyon Rims potential ACEC be included in Alternative C is noted. In the preferred alternative (Alt C), this portion of the Canyon Rims is managed as controlled surface use for oil and gas leasing, as it is designated as VRM II. Surface disturbing activities must meet the constraints of VRM II management (see Appendix C of the DRMP/EIS). The BLM contends that the prescriptions provided in Alt C are sufficient to protect visual resources along the rims of the Canyon Rims area. Refer to response to comment 124-69. Lockhart Basin is entirely within the Monticello BLM planning area.
Diane	Orr	492	8	Mill Creek may be the richest source of archeological information within the Moab district. To quote the proposed management plan document “Cultural resources are extensive and span the entire prehistoric context” (page 3-130) and “Mill Creek Canyon’s cultural resources have also been identified as being of exceptional importance to Native Americans” (page 3-131). Rock art panels are extensive and meet National Register qualifications. Potential for research questions may be addressed in Mill Creek Canyon because many of the sites have greater depth and integrity than those in other areas. The supplied maps are insufficient to indicate whether the culturally rich uplands are included. It is imperative that these lands be protected within an archaeologically focused ACEC. We are concerned about a proposed residential development on SITLA land immediately adjacent	Mill Creek Canyon Potential ACEC is designated as an ACEC in Alternative B and C. Under both alternatives, the area would be prioritized for Class II inventory and would protect native American traditional cultural places. Alt C does manage the Mill Creek uplands as part of the Mill Creek Canyon ACEC. The Mill Creek Canyon ACEC in Alt C differs from Alt B only in that the WSA acreage is removed from the ACEC in Alt. B. Under All Action alternatives, Mill Creek Canyon would have a cultural resource priority of scientific reach of prehistoric sites and cultural landscapes and would be managed in accordance with the Mill Creek Management Plan (2001). Refer to response to comment 124-69. Actions on SITLA lands are not within the authority of the BLM.

				to this area. We believe that strong cultural resource protection needs to be in place prior to the completion of this development.	
Diane	Orr	492	9	Upper Courthouse – We recommend Alternative B for this proposed ACEC. Upper Courthouse with its riparian areas has a high density of archaeological sites. Known sites exist near Hidden Valley, Brink Spring, Bartlett Wash, and unnamed drainages to the north. The Courthouse Rock area has already experienced vandalism to rock art panels (The Buffalo Blue was rubbed out several years ago) and recreational use in this area continues to be high and is increasing in intensity each year. We believe active protection of archeological sites needs to extend beyond grazing to also include visitation.	The commentor's preference that the Upper Courthouse potential ACEC be designated as proposed in Alt B is noted. Refer to response to comment 124-69. The State Director will make a decision based on consideration of public comments, analysis of the impacts, resolution of the issues, purpose and need for the plan, and the planning criteria. The BLM can choose management actions from within the range of alternatives. All cultural sites, including those in the Upper Courthouse area, are fully protected by the law. The Upper Courthouse area is part of the Labyrinth Rims/Gemini Bridges SRMA. This enables the BLM to manage recreationists in a more intense manner. This area is one in which camping must occur at designated sites.
Diane	Orr	492	10	Kane Creek Canyon – We do not see any proposed protection under ACEC for the BLM land along the south side of the Colorado River downstream from Moab and up Kane Creek. This area is dense with rock art and other archeological sites of national register quality. It is being documented as part of the proposed Wall Street rock art district. This area receives high visitation, is experiencing non-approved off-road vehicle use, and need appropriate protection and interpretation at highly visible rock art sites. We believe this area from the Moonflower Site up canyon for approximately 6.5 miles needs to be protected under an archeologically focused ACEC.	Kane Creek Canyon is included in the Behind the Rocks ACEC, which is included in the preferred alternative. Archeology is a relevant and important value of the Behind the Rocks ACEC. In addition, the area referred to by the commentor is managed as part of the Colorado Riverway SRMA. This designation gives the BLM the ability to manage recreationists. In addition, all cultural sites, including rock art, are fully protected by law.

				Page 2-8 proposes scientific restoration of archeological sites from Highway 191 to Kane Creek Canyon. We see no reason to stop at Kane Creek Canyon and suggest that this restoration continue within our proposed area.	
Diane	Orr	492	11	Seven Mile Canyon – Seven Mile Canyon is an area with many national register quality rock art sites. The campground is located at the mouth of the canyon and the road through the canyon recently washed out. We recommend that this road and campground should not be re-established. We also recommend that this area be included in an archeologically focused ACEC.	The commentor's preference that Seven Mile Canyon be established in an archeologically focused ACEC is noted. The camping area at the mouth of Seven Mile Canyon has been closed since 2006. As part of an SRMA, this area can be managed for camping management. The BLM intends to keep the Seven Mile Canyon area closed to camping. The road in Seven Mile Canyon is designated in Alt. C; however, it has been truncated closer to Highway 313. Refer to response to comment 124-69.
Diane	Orr	492	12	Hellroaring Canyon – An unauthorized off-road vehicle road has been created to the Barrier Canyon Style pictograph site in this canyon. We recommend that this road be closed to protect the rock art site.	Each of the 33,000 routes was evaluated for its possible impacts to cultural resource, using Class I inventory methods. Many routes were deleted from Travel Plan alternatives due to conflicts with cultural resources. Archaeological damage violates Federal law. Violations of law are beyond the scope of the land use plan under consideration. The vehicle route in the main part of Hell Roaring Canyon was bladed during the uranium mining era of the 1950's. This constructed route has been designated in the preferred alternative. The user-made spur route from that route to the actual rock art site is not designated.
Diane	Orr	492	13	Klondike Bluffs – It is not clear from the maps if there is any special protection for the rock art sites located at Klondike Bluffs outside of Arches National Park. We recommend an archeologically focused ACEC for this region if it is not protected.	The commentor's preference that the Klondike Bluffs be designated as an ACEC is noted. This area was not proposed during scoping to be considered as an ACEC by either the public nor by BLM staff.

					All archaeological sites are protected by law, including all rock art sites. Refer to response to comment 124-69 regarding ACEC designation.
Diane	Orr	492	14	Levi Well – We are concerned about a road segment which bisects an area with a high archeological site density. It is south of Levi Well located in the south half of section 25 Township 23S, Range 18E. In addition to a very extensive lithic scatter, there are rock art panels and dinosaur bone area. Recently a Site Steward encountered remains of a new campfire and camping activity on the site. The area needs to be managed to protect site integrity.	Each of the 33,000 routes was evaluated for its possible impacts to cultural resource, using Class I inventory methods. Many routes were deleted from Travel Plan alternatives due to conflicts with cultural resources. Under Management Common to All Action Alternatives (page 2-7), camping would be prohibited and posted within or on archaeological and historic sites eligible for listed on the NRHP. Archaeological damage violates Federal law. Violations of law are beyond the scope of the land use plan under consideration. See also response to comment 415-13.
Diane	Orr	492	15	Rock Art Nomination Districts – URARA is committed to the documentation and preservation of Utah rock art sites. The Moab district contains one of the highest densities of rock art in the state. We are willing to donate our time and resources to assisting the BLM in creating the Rock Art Districts described on Page 2-8 under Alternative B. Mill Creek Canyon needs to be added to this list.	Under all Action Alternatives, the cultural resource management priority for Mill Creek Canyon would be scientific research. Both the north and south forks of Mill Creek would be prioritized for Class II and II surveys and would be targeted for scientific restoration of damaged cultural resources. BLM believes that these measures are more appropriate to document and preserve this site than development of the site for public visitation and interpretation. On pg. 1-11 of the DRMP/EIS, volunteer coordination is identified as an issue addressed through policy or administrative action and does not require a land use planning decision. The decision to prioritize sites for National Register Nomination has been removed. National Register nomination is not a planning decision. See response to comment 1-26.
Bryan	Bailey	620	1	All trails in the Moab area should be left open. It is not right that while you do these reports you only show the bad. You purposely leave out all the beauty you will be closing off to majority of people that visit this area. In the name of save it for the	Comment noted. The BLM attempts to provide recreation opportunities for many and diverse types of recreation. However, the Moab planning area has finite recreation resources and for the BLM to commit to providing alternative opportunities for all types of potential

				next generation?	recreation uses is not realistic. Therefore a balanced multiple use approach, as required by FLMPA, is used to provide recreation opportunities.
David Paul Xavier	Burch	622	1	BLM's proposal will result in 84 percent of public lands near Moab (those south of I-70 which attract most of the area's visitors) being within ½ mile of a designated ORV route (see proposed route map on our website). At the same time, BLM has done no-site specific studies to determine the impact of these routes on Native American cultural sites or other natural resources like riparian areas or wildlife habitat. Science to back up the ORV route designations does not exist in this document.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Keith	Davis	628	1	Keep the following routes open to motorized and non-motorized recreation: -White Wash Sand Dunes -Goblin Valley -The last bit of Gemini Bridges -Thompson Trail and Copper Ridge Loop (as proposed by Ride with Respect) -Ten Mile Wash	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
John	Rzeczycki	629	1	I was glad to see that Coyote Ugly Trail in the Black Ridge area was not included in any of the options. I strongly agree with the BLM decision not to include this trail, but I am also concerned that the BLM may change their decision due to pressure from the OHV groups. The reasons why this trail should not be designated: 1-The trail was established just over 2 years ago under questionable conditions. Even though this area is designated open to cross country travel, it seems that some laws were broken in its establishment. The creation of the trail has created "unique and unnecessary degradation" to the land, i.e. killing of trees and plants, scaring of rock and large quantities of spilled oil and gas.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				2- The Trail is not a thoroughfare, it is a simple horseshoe that exits close to its entry. 3- San Juan County has made no claims on this trail as a road or right of way. 4- The Coyote Ugly is in very close proximity to 4 large parcels of private property. One of which has been sub-divided for development. 5- My property is located between the Coyote Ugly and Area BFE, this creates a trespassing problem, i.e. cutting of fences and creating spur trails, along a wash on our property, this was has not been claimed as a road or right of way by San Juan County or State of Utah. 6- The BLM has done extensive research on its draft and chose not to include it. 7- No person or government office made any claim to this trail.	
Katie	Creighton	631	1	While not all of the listed WSA lands may become designated wilderness in the future, managing as many as feasible now will leave more options for future land managers and public users. While I commend the BLM for picking a Preferred Alternative that protects Beaver Creek, Fischer Towers, and Mary Jane Canyon, I implore you to take a further look at protecting Desolation Canyon, Goldbar, Granite Creek, Hatch Wash, Hunter Canyon, Shafer Canyon, Westwater Canyon, and Coyote Wash as WSAs. The Preferred Alternative C protects three (3) of these areas compared with Alternative B's thirty-three (33). For trying to be a "balanced approach of protection/preservation" and "commodity production and extraction" this does not seem like a fair compromise.	The commenter is confusing Wilderness Study Areas (WSAs) with non-WSA lands with Wilderness Characteristics. All WSAs are managed to preserve their suitability for wilderness designation. The management and level of protection of the wilderness characteristics on non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Any non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the management prescriptions established in the RMP. These Non-WSA lands have many resource values and use in addition to wilderness characteristics. The DRMP/DEIS considered all available information and a range of alternative prescriptions for how these values and uses would be managed. See response to comment 124-53.
Monica	Israels	632	1	We've noticed some fantastic kiosks and information areas in many places in the Moab	See response to 413-9 regarding focus areas. Education and signage are all administrative actions and do not

				area. It would be fantastic if more of these could be created and maintained. I think that education is the solution to our “user conflict” in the area, rather than segregating the different types of users. Through I have not experienced much difficulty with user conflicts, I can see how it would happen if people were caught by surprise. If everyone knew what to expect and how to behave on each individual trail, there would be no surprises or conflicts. The continued and increased use of informational kiosks at trailheads would be very welcome and useful.	require land use planning decisions. These suggestions will be considered during implementation of the Travel Plan after the land use plan is completed.
Lee	Sheets	633	1	Please consider both hands of Millcreek to be designated as Wild and Scenic River sections. They both contain historical and cultural artifacts. They both have fish and wildlife. They both offer recreation to many people, especially the tourists who keep this local economy alive. And not to mention the biological, botanical and ecological systems are extremely diverse and thriving. I hope that this area continues to thrive and I feel this would be achievable if these special river systems were protected by the Wild and Scenic River policy.	See response to comment 124-88.
Naill	Gartlan	634	1	Federal law requires the BLM to give priority to the protection of lands which qualify as Areas of Critical Environmental Concern because of scenic, cultural, or ecological importance. However, the Moab BLM plan would fail to protect 90 percent of the 613,077 acres which qualify for ACEC designation. Please revise the RMP to reduce the destructive and redundant web of ORV routes. The Moab area, as with the rest of the state, should provide opportunities for traditional non-motorized use and provide ecological havens for the long-term health of the land, the wildlife, the water, and other natural and cultural resources.	See response to comment 124-68 regarding ACEC designations.

Eric S.	Elson	635	1	In Chapter 2, Table 2.1 page 2-25 – I disagree with Alt C statement: “close the spur route to Gemini. Bridges to facilitate public use and help restore damaged lands along the spur route. Construct a parking area near the bridges.” Closing route to access areas doesn’t facilitate “public use.” Area should be open and read “Spur to Gemini Bridges will remain open. If unacceptable damage to natural or cultural resources be recreational use is anticipated or observed, BLM would seek to limit or control activities by managing the nature and extent of the activity or providing site improvements.”	Comment noted.
John M.	Veranth	636	1	Both alternative B and C are major improvements over the current situation, Alternative A. As a general comment, I consider Alternative B to be the most appropriate of the listed alternatives and am disappointed that the BLM did not consider a true “maximum resource protection alternative” that would have been more restrictive than B. NEPA requires consideration of a full spectrum of alternatives.	See response to comment 124-9
John M.	Veranth	636	2	Regarding ORV travel, I strongly support the closing of areas to unlimited cross country travel and the designation of routes. ORV trespass has been an ongoing problem on my property and on that of adjacent landowners since the BLM-private boundary is not completely fenced. On the adjacent BLM land I have noted extensive ORV tracks cut into hillsides that disturb the limited vegetation and will lead to future erosion and other resource loss. This area is also rich in archeological resources and I have hiked along ORV tracks that pass directly through significant chipping sites on BLM land. Closure of unlimited cross-country travel will improve the situation.	The BLM Manual at 8342.1 identifies protection requirements for OHV designation. The following resources must be considered in the designation process; cultural, historical, archaeological, soil, water, air, scenery, vegetation, wildlife, wildlife habitat, threatened or endangered species, and wilderness suitability. The larger open area poses conflicts with many of these resources. An open area is proposed near the White Wash Sand dunes to provide recreation opportunities of this nature in the area best suited for this activity.

John M.	Veranth	636	3	Regarding specific routes in the Westwater area, I am especially concerned about the two southward spur extensions in the Little Hole area which are shown as ORV routes by BLM but which are not proposed as vehicle routes by Grand County nor are in Alternative B. I frequently hike the Little Hole area and every year I see more extensive tracks pushed through previously undisturbed vegetation that is within the WSA boundary. It appears that these spurs attract vehicle trespass further into the designated WSA. These spurs should be closed as proposed in Alternative B.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
John M.	Veranth	636	4	I have a BLM R/W lease for access from the existing County D road, mapped as an ORV route to the boundary of my property. My existing vehicle track was correctly not designated as an open ORV route, but I presume the current R/W lease will continue and be able to be renewed under all alternatives.	See response to comment 120-16
John M.	Veranth	636	5	Having addressed specific road issues near Westwater, I will comment that in general, the proliferation of ORV routes shown in BLM Alt C is far in excess of any reasonable accommodation of recreational vehicle use and will lead to future resource management problems. A well defined network of main routes, scenic loops, and spurs to overlooks is manageable and enforceable. The haphazard jumble of proposed routes in areas such as Mineral Point and Tenmile Point is not.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
John M.	Veranth	636	6	Reviewing the BLM public information pages versus the draft EIS, I notice a serious conflict in relative priorities of recreation versus Oil and Gas in Alternative C. The BLM webspage reports “over two million visitors per year” and recreation being “62% of the Grand County economy.” On the other hand, existing oil and gas is 43 and 270 wells, and since many of these are small producers the	In Chapter 4 of the DRMP/EIS, the BLM acknowledges the economic values of recreation in the Moab planning area. In Alt C of the DRMP/EIS, the highest value recreation areas within Labyrinth Canyon, such as the Green River and its major tributaries, are protected from oil and gas disturbance by the application of a no surface occupancy

				economic contribution is small. Yet many of the areas prized for their recreation values such as Labyrinth Canyon, Fisher Towers, and Match Point are proposed for energy leasing. I urge the BLM to amend the DEIS to 1) Close to leasing areas with high recreational use or high wildlife value, 2) Require more restrictive stipulations on adjacent areas where development will impact the high recreational use areas. Important and necessary restrictions include “no surface occupancy,” seasonal restrictions to protect wildlife (an especially important issue in the Book Cliffs), and ripping and restoring roads after exploratory drilling and seismic surveys. The restrictions mapped in Alternative B are a much better reflection of recreational values.	stipulation. Fisher Towers is proposed to be managed as either closed to oil and gas leasing, or with a no surface occupancy stipulation. Hatch Point is proposed to be managed with a controlled surface use stipulation for oil and gas leasing to protect its important visual resources. Other high value recreation areas are similarly restricted from oil and gas leasing and all other surface disturbing activities. These areas include , but are not limited to,,the entire Green, Colorado and Dolores River corridors, Sand Flats SRMA, Goldbar Hiking Focus Area, and Beaver Creek. A no surface occupancy stipulation is sufficient to protect the recreation values in these and other areas, since surface occupancy is precluded. Important wildlife values are protected in Alt C. by timing limitation stipulations and controlled surface use stipulations. Desert bighorn sheep habitat is protected with a no surface occupancy stipulation.
John M.	Veranth	636	7	I support the NSO and Special Stipulations designations shown in Alternative B for the Westwater area and would urge that these restrictions be expanded. An energy development corridor following the railroad tracks and existing D roads south of I-70 would suffice for reasonable exploration access and would protect the dark skies, solitude and viewsheds in this remote area.	Westwater WSA is closed to oil and gas leasing under all alternatives. Alt C of the DRMP/EIS, manages the rest of the Westwater area much the same as Alt. B.
Laura	Lindley	639	1	I strongly object to management of so called “wilderness areas” as de facto wilderness study areas. The Federal Land Policy and Management Act provided a mechanism for the designation of wilderness study areas and that congressionally designated process should not be evaded through the land management process.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Randy	Riches	640	1	There are a couple sections of this trail [Flat Iron Mesa] that are not clearly documented in your plan. Based on what we’ve seen in the past, if it isn’t clearly documented as a road, it will be	See response to comment 206-11

				closed. I was also looking forward to trying Strike Ravine, but it also has missing sections in our documentation.	
Chad	Moore	642	1	I believe your office underestimated the value and suitability of some of these rivers, only preferring three of the studied rivers to be suitable for this [WSR] designation. I encourage you to take a second look at the rivers not found suitable. I'm particularly bothered by the segmenting of the Green River into suitable and non-suitable areas. This goes against the basic theme of watershed management- dividing up the river into discrete unrelated sections. Protection will clearly be strengthened by including the segment around the town of Green River and management will be easier. I can just imagine future land managers rolling their eyes at the difficult situation you are about to deed them. Please if you err, err on the side of conservation and long-term sustainability.	See response to comment 124-88.
Gabriel	Williams	643	1	While this comment period allows us to voice our concerns for the land use, remember these decisions affect not just the dirt, but the surrounding communities. Green River, Fruita/Mack and Moab all reap a large portion of their economy from the OHV community. Attractions such as Arches NP, Dead Horse, Canyonlands, etc., while a large "tourist draw" will not sustain these communities should OHV be greatly limited, especially areas like Green River which are not close to the "parks." These communities will suffer deep economic impacts.	Throughout its action alternatives, but especially in alternative C, the BLM has sought to provide recreation opportunities and benefits for the wide variety of users, all of whom potentially contribute to the local economy.
Gabriel	Williams	643	2	There must be opportunities for "open" riding. The White Wash Dunes have supported OHV use for decades and should be kept open at all costs. Making this area "foot traffic only" is utterly ridiculous. The distances and sand dune character make the idea of this being a "hiking" area pretty	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring

				remote.	and site specific NEPA analysis.
Gabriel	Williams	643	3	Each alternative is greatly lacking in “true” trail inventory. Several long standing routes were omitted and it is my understanding that miles of single-track were not even inventoried. In an era of “closed unless open” management, how is this the right thing to do? In addition there are several areas including the Cisco Desert area where many of the washes should be listed as “open” to the Copper Ridge system should be added/included in the Thompson Trail.	See response to comment 122-29
Terry J	Peavler	644	1	Dispersed camping is critical to a pleasant public lands visit. When we visit a National Park, we expect to be shoe-horned into designated, sterile campgrounds. A significant reason for visiting USFS and BLM lands is to enjoy camping experience. In my area, whenever dispersed camping has been banned the result has been illegal camping that is extremely destructive. If your wish is to protect the public lands you have to give users alternatives other than stay home, camp in the equivalent of a Walmart parking lot, or break the law. Your plan never mentions how many campsites may be available or how they will be determined. The public should have a say—aren’t these supposed to be PUBLIC lands?	Public participation has been solicited throughout the land use planning process. See responses to comments 123-8. Dispersed camping is allowed on over 95% of the Moab planning area. See response to comment 120-86 regarding vehicular access to dispersed camping sites. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision.
Greg	Marshall	645	1	Please consider, if you have not already, putting this trail [Cisco Desert trail approx. 80 mile trail just outside of Thompson Springs]. This trail appears to be on the Designated Motorcycle Routes Alternatives C & D, but only as an alternative D route. Since the plan appears to be the acceptance of Alternative C I am assuming this trail will no longer be open – please reconsider if this is true.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Dick	Artley	646	1	I demand (emphasis added) that every acre of the public land that you were mistakenly given control	The BLM has no obligation to close to oil and gas to all lands that are within a bill introduced in Congress, the

				of that is part of the area covered by the America's Red Rock Wilderness Act to be put off-limits to any and all development activities in your final RMP> This is an official public request for a new alternative to be analyzed. If you know anything about the federal rules on planning you will know what this means. I do not expect you to analyze this alternative and then illegally chuck it into an "analyzed, but not given an opportunity to be selected" bin. Implementing a version of Alt B is as close as you can come to the most obvious alternative…which would have been the first alternative to come to mind for any thinking human that was not bought-and-paid for by corporate America. So start with B and change it! If you will read your Purpose and Need again, you will select it!	Red Rock Wilderness Act. Should Congress direct the BLM to close all lands to oil and gas leasing, the BLM will comply with the law. The DRMP/EIS provides 4 alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping. The BLM examined about 558,956 acres of lands proposed in the Red Rock Wilderness Act for the existence of wilderness characteristics. The BLM found that 266,485 acres of these lands contained wilderness characteristics and are proposed for protective management in Alternative B. The remaining 292,322 acres of the Red Rock proposal did not have wilderness characteristics based on the inventory maintenance conducted by the BLM between 1996 and 2007. The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. The BLM determined that a single alternative analyzing

					the protection of all Non-WSA lands with wilderness characteristics would best provide a reasoned choice among the alternatives. Although the other alternatives do not provide specific management prescriptions to protect Non-WSA, these alternatives analyze and disclose the impacts of the proposed resource management prescriptions, uses and actions on the Non-WSA lands with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these Non-WSA lands. If all alternatives contained comparable protections of the Non-WSA lands with wilderness characteristics, the alternatives would have substantially similar consequences and would not be significantly distinguishable. The BLM, in developing the PRMP/FEIS, can chose management actions from within the range of the alternatives presented in the DRMP/DEIS and create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple-use mandate.
Kathy	Glatz	647	1	The current road and trail network in SE Utah is the unplanned result of historical seismic and mineral exploration. This haphazard spider web of routes makes no sense whatsoever as a reasonable recreational transportation plan. Consider the Redrock Heritage transportation plan which is based on the following principles: -Vehicles should be restricted to designated roads and trails throughout the entire SE Utah region no “open” ORV play areas -In order to facilitate enforcement, there should be a “closed unless signed open” policy -All routes should serve some identifiable and	The BLM Manual at 8342.1 identifies protection requirements for OHV designation. The following resources must be considered in the designation process; cultural, historical, archaeological, soil, water, air, scenery, vegetation, wildlife, wildlife habitat, threatened or endangered species, and wilderness suitability. The larger open area poses conflicts with many of these resources. An open area is proposed near the White Wash Sand dunes to provide recreation opportunities of this nature in the area best suited for this activity.

				compelling purpose -There needs to be adequate opportunities for both motorized and non-motorized recreation while avoiding conflicts between these two groups -Ecologically damaging routes, such as route through riparian areas, should be closed. -There needs to be adequate opportunities to get out of earshot of motorized trails	
Marlin	Sharp	650	1	Klondike Bluff's Area. We hope it will remain a multiple use area allowing bicyclists and motorized travel to enjoy this route. The views are spectacular into Arches National Park and it's a unique route to see ancient dinosaur tracks. I hope the route over the top into the north road above Arches National Park will remain open as it has been for years to come.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Michael	Manley	651	1	You have created new ways to close areas with litigation in the future. Areas of Critical Environmental Concern and Lands with Wilderness Character are a tactic from the "wilderness area study" playbook. The WSA's lingered for years without any action and became de facto wilderness. The more of these categories you create, the more you please the anti-access groups. You only respond to special interest group lawyers, leaving the public to fend for themselves. 'Public lands' seems to be an historical reference with no equivalent in current times. From all alternatives, please drop all references to ACECs, LWCs WSAs, and whatever special categories that you will be using to limit public access. We could appreciate your managing the lands for today's public and for multiple users' per Congressional directives to BLM. It is not obvious from this that will be happening.	See response to comment 121-58
Adam	Krefting	653	1	Additional closure of the more well known and established motorized routes, such as the	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under

				proposed closure of Rabbit Valley/Westwater motorcycle riding area in alternative D is, to me, a profound tragedy. I cannot understand why this area is seriously being considered for closure. I have never seen a hiker or an equestrian in this area. The trails are sustainable and generally in good condition. The area is not overused. Please do not close Rabbit Valley/Westwater to motorized use.	Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Tom	Johnson	655	1	I am a Moab resident and am extremely concerned about the future economic vitality of Moab in relation to the disproportionate emphasis in the Draft RMP placed on motorized recreation. According to a recent user survey, only 6% of the visitors come for motorized recreation and 94% come for non-motorized recreational opportunities.	The commentor is referring the Table 4.67 which 59 respondents (6%) indicated OHV use as their MAIN activity. The commenter has not included the 10+% that participate in scenic driving as their MAIN activity. Table 4.67 also includes percentages of those that participated in motorized recreation to some extent, regardless of main purpose of their visit. Those percentages are 11.5 and 36.3 respectively. See also response to comments 124-134 and 124-135 The NVUM study should not be considered a definitive snapshot of recreation activities in the MPA. The commentor seems to assume that recreationists to the Moab planning area (MPA) are cleanly divided into motorized versus non-motorized users, with members of one group never participating in activities associated with the other group. Morevoer, The BLM has no data to separate out motorized versus non-motorized recreation spending. However, it is worth noting the growth that the economy of the MPA has enjoyed in the past decade, primarily in the areas of recreation and tourism, but also the presumably related second home market. This has occurred within the context of the current Grand Resource Plan (aka the No Action alternative), with its less restrictive leasing and OHV management. There is no reason to expect that a more restrictive environment for oil and gas leasing or OHV recreation (as would be the case in all action alternatives) would harm these industries. For the reasons outlined in Chapter 4, pg.

					271, the BLM believes that Alternative C (the Preferred Alternative) provides the greatest economic benefit to the MPA's economy in the context of OHV management. The commentor seems to assume that recreationists to the Moab planning area (MPA) are cleanly divided into motorized versus non-motorized users, with members of one group never participating in activities associated with the other group. Even assuming that the two groups are completely distinguishable, the BLM has no data to separate out motorized versus non-motorized recreation spending. However, it is worth noting the growth that the economy of the MPA has enjoyed in the past decade, primarily in the areas of recreation and tourism, but also the presumably related second home market. This has occurred within the context of the current Grand Resource Plan (aka the No Action alternative), with its less restrictive leasing and OHV management. There is no reason to expect that a more restrictive environment for oil and gas leasing or OHV recreation (as would be the case in all action alternatives) would harm these industries. For the reasons outlined in Chapter 4, pg. 271, the BLM believes that Alternative C (the Preferred Alternative) provides the greatest economic benefit to the MPA's economy in the context of OHV management.
Tom	Johnson	655	2	None of the Alternatives proposed by BLM adequately address the off-road-vehicle crisis that is evolving in the Moab area. The BLM's Preferred Alternative calls for a network of unnecessary roads to nowhere that puts 96.5% of the BLM land south of I-70 less than a mile from a road.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified.

					The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, [four] alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Moab DRMP/DEIS provides in comparative form the management actions associated with each alternative.
Steve	Parmelee	656	1	Please add me and my comments to the scoping process.	NRR
Steve	Parmelee	656	2	Please keep access open to all Americans. Some Americans are disabled, less able, or just older. Denying access is not fair and maybe in violation of Federal ADA regulations.	The ADA accessibility guidelines do not specify or quantify the type or degree of access that must be allowed on public lands. The ADA does not require that all public lands be vehicle accessible. In addition, designated recreational motorized routes are an administrative decision and not subject to ADA. However, the ADA accessibility guidelines will be use in construction of any Federal facilities on public lands.
Richard	Griffin	658	1	The cumulative impact analysis for the RMP is inadequate. The analysis of cumulative impacts does not support the conclusions reached and does not provide sufficient information to evaluate the impact. For instance, the first resource category listed in section 4.3.24.1 is air quality. The analysis of cumulative impacts on air quality for all alternatives is only two paragraphs in length, containing a mere 264 words. The document states, “Long term cumulative impacts from the activities proposed for all resource decisions on air quality are projected to be minimal to negligible	See response to comment 124-7. The BLM has added the following reasonably foreseeable non-BLM actions to the cumulative impact analysis: minerals extraction on private and SITLA lands; on going residential growth and business development throughout the planning area; and expansion of U.S. Highway 191. OK

				under all alternatives," but provides very little data to support this conclusion. The only supporting statement for this conclusion is a single sentence that states, "Detrimental effects from oil and gas development are expected to be small as emissions and fugitive dust control would be a required part of the permitting process." Well, how small is small and how does this relate to other impacts from other past, present, and reasonably foreseeable future projects? Without providing more specificity on the impacts of this project and the impacts of other related projects, including those of other RMPs the BLM has under consideration, there is no way to determine the magnitude or significance of the cumulative impact or the degree to which this RMP contributes to these impacts. This comment is not limited to just air quality but to all resources addressed in the cumulative impacts section.	
Richard	Griffin	658	2	The RMP failed to consider any of the many connected actions they may result with implementation of the alternatives. Consider air quality again as just one example. The RMP addresses the direct and indirect impacts on air quality from different management decisions such as mineral development but didn't identify any connected actions that would not occur if it were not for these management decisions. For instance, there may be significantly regional air quality impacts resulting from coal fire power plant emissions that would not have occurred if it were not for the management decisions made in this RMP.	Cumulative impacts are addressed in Chapter 4 of the DRMP/EIS.
Richard	Griffin	658	3	Your website provides the following direction for submitting comments, "Comments may identify new impacts, recommend reasonable alternatives, or disagree with the determination of significance."	A systematic interdisciplinary approach was used to provide accurate, objective and scientifically sound environmental analysis on the environmental consequences associated with the management actions

				Unfortunately, the RMP completely fails to address the significance of the impacts of any of the alternatives. The RMP identifies direct and indirect impacts but not the significance of those impacts. Without knowing the significance of the impacts of their actions, how can BLM decision makers expect to make an informed decision as to which alternative to implement and how can the BLM expect the public to provide meaningful comment on the alternatives without this information.	or prescriptions under each alternative. [Note: A statement on travel planning's analysis specific to Moab is needed] The analysis discloses the direct, indirect and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives.
Stacy	Newman	659	1	Alternative C itself needs some work (i.e. the segments of Flat Iron Mesa, Strike Ravine, and 3D trails are missing, and I think Yellowcat is becoming popular for 4x4 activities and should be reviewed for further use). I also see things in Alt C that confine vehicle use to small areas without easily identified ground boundaries (i.e. White Wash area.	See response to comment 206-11
Robert L.	Clark	660	1	I have relatives who live near the White Wash Sand Dunes area and we all like to spend time together there on scenic trails when we visit. I understand from them that your agency is in the process of implementing a fee system, using Individual Special Recreation Permits, to help fund the cost of managing the area. I believe that this proposed fee system skirts the intent of the Federal Land Recreation Enhancement Act handed down by Congress in that it does not involve the public when charging fees for recreation and doesn't ensure that the funds benefit the area where they are paid. I am opposed to an individual special recreation permit for this area and other areas that the BLM manages for the reasons I have stated and believe that without full public involvement in the recreational fee process the BLM is	See response to comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes and the Federal Lands Recreation Enhancement Act. See response to comment 123-26, as well as comments 122-22, 124-11, 124-112 , and 124-110 regarding clarification of SRP policies. The fees collected in the Moab Field Office are used for operations of this type, in accordance with FLREA.

				countermanding the voice of the people and Congress as dictated by the FLREA. Furthermore, it is my opinion that the BLM should manage all other funding sources, including RTP, OHV and other grand programs until they are expended before any fee program is established in any BLM managed area.	
David	VanDuyn	662		I am concerned on the timing of your comment period. I do not understand why you are only giving us one month to comment, plus the fact that you have placed that month at one of the most hectic times of the year suspicious of your commitment to public input.	See response to comment 124-1
Dirk	Martin	663	1	Coalbed Methane – Development Potential Map 3-3 This is ridiculous. Where would the water come from that is needed to extract the coalbed methane? The already over-used Colorado river? The 1922 Colorado Compact is already divvied up the river and then some to the 7 western states. They will not give up any water rights for extraction so that means it will have to come from somewhere else. Plus, what about the pollution factor? CBM extraction is a notoriously dirty operation. Can the BLM guarantee that there will be no pollution to the ground water and tributaries to the Colorado River? I don't think so.	On pg. 4-6 of the DRMP/EIS, it is stated that coalbed methane development is expected to occur in the northeast corner of the Moab planning area, where there is high development potential. Future coalbed methane exploration over the next 15 years is expected to entail testing at 3 5 spot well clusters, or 15 new wells, with a cumulative surface disturbance of 225 acres. Until a specific proposal is provided, the water needs of such a project cannot be analyzed.
Mark	Sevenhoff	665	1	It is obvious that the old way of sharing jeep routes with everyone, the basis of mountain biking in Moab, no longer works, Gemini Bridges, Poison Spider Mesa, and Gold Bar Rim are classic examples. With new 4-wheeled drive technology, the alterations (Damage) to the trails are such that cyclists cannot use the same routes unless they like taking their bike for a walk. The Grand County Non-Motorized Trails Master Plan proposes	See response to comment 122-46

				alternate route in each of these areas. The Green Dot / Bull Canyon (Gemini area), Blue Dot (Gold Bar single-track listed in “D”), and Wags Way-which is all slickrock (Poison Spider area). Trails should be priority projects ASAP. There are user created routes that traverse slickrock in areas that have been overrun by motorized traffic.	
Laura	Cameron	666	1	I do not feel that the 10 areas designated in Alternative C for Wild and Scenic Rivers is sufficient. Since none of the rivers in Utah have yet achieved this designation I feel that the proposal for 24 areas in Plan B, to be designated as Wild and Scenic Rivers are a more appropriate number. Water is becoming a more precious commodity as global warming continues to bring more droughts to the area. We need to protect our waterways.	See response to comment 124-88.
TeriAnn	Wakeman	668	1	I feel that the final RMP should not lock public lands away from the public, nor should access be fee based. Fee based systems are discriminate against those with limited resources and generate an animosity between the user and those who administer the fees. It also requires a police like enforcement program that would require financial resources to carry out.	See response to comment 123-10 regarding possibility of a fee system for use of the open area in White Wash Sand Dunes. Enforcement actions are administrative and do not require land use planning decisions.
Gina	Iannelli	670	1	One of my main concerns is the short time frame for public comment. Ninety days is a totally insufficient amount of time to try and read, digest, and comprehend the scope of the plan which took years to put together. Something of this magnitude needs the ample time it deserves for the public, whom you are serving and who are interested in how the land is used and maintained, to be able to participate in this crucial step. The public comment period is woefully inadequate, unfair and limiting. You claim to look for a balanced approach to conflict resolution but you cant expect that when you don’t allow for the opportunity for a fair and	See response to comment 124-1

				balanced input. A land use plan that has been in effect since 1985 is getting only 90 days for a comment period. That is truly unbalanced.	
Nick	McCracken	672	1	Flat Iron Mesa: 1. From about 4246450 N 636300 E heading NW to the pipeline road 2. From about 4245600 N 634700 E going SW to Plan trail 3. From about 4246200 N 63400 E going SW to the county B road 4. From about 4242400 N 63400 E south then east to plan road	See response to comment 206-11
Nick	McCracken	672	2	Strike Ravine: 1. A portion of the "big ugly" hill at about 4254500 N 636600 E 2. The north-to-south section accessing and traversing the property purchased by Kiley Miller (note: San Juan County has continuously supported this right-of-way claim in court).	See response to comment 206-11
Nick	McCracken	672	3	3-D Trail: From about 4285900 N 609900 E north then west to 4286400 N 609300 E	See response to comment 206-11
Joel	Koedoot	673	1	Fisher Towers area. Your preferred alternative would allow oil and gas development on the mesa north of the towers, and to the west of the towers. It also proposes ORV routes on the mesa north of the towers. I have hiked and climbed in this area many times and greatly enjoy the solitude and views which can be experienced from the mesa top. I feel that ORV routes on the mesa would ruin the wilderness values critical to my recreational experience in this area. Furthermore, I believe that oil and gas development on these visually spectacular lands would leave lasting scars and permanently degrade the wilderness values of nearby areas. Please reconsider your preferred alternative so that it will not impact the non-motorized recreational user so negatively and will protect existing wilderness values.	The commentor's preference for Alt B is noted. The scenic values of the Fisher Towers area are protected in Alt C by the imposition of a closed category and no surface occupancy stipulation in the entire Richardson Amphitheater. The BLM has chosen not to manage the Top of the World mesa to protect its wilderness characteristics.
Joel	Koedoot	673	2	Fisher Towers area. Your preferred alternative would allow oil and gas development on the mesa north of the towers, and to the west of the towers.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel

				It also proposes ORV routes on the mesa north of the towers. I have hiked and climbed in this area many times and greatly enjoy the solitude and views which can be experienced from the mesa top. I feel that ORV routes on the mesa would ruin the wilderness values critical to my recreational experience in this area. Furthermore, I believe that oil and gas development on these visually spectacular lands would leave lasting scars and permanently degrade the wilderness values of nearby areas. Please reconsider your preferred alternative so that it will not impact the non-motorized recreational user so negatively and will protect existing wilderness values.	routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Joel	Koedoot	673	3	Tenmile Canyon: Your preferred alternative proposed an ORV route down the entire length of Tenmile Canyon, from Dripping Springs all the way to the confluence with the Green River. Tenmile Canyon has one of the few perennial streams in the Moab area and is home to some of the oldest archaeological sites in the state. As such, it is difficult to imagine a less appropriate place for an ORV route than Tenmile Canyon. To make matters worse, your agency has not surveyed the archaeological sites in the canyon, so the risks associated with ORV use (such as vandalism and looting) are unknown. I have hiked in this canyon several times; each time I was continually disturbed by noise from ORVs. Unfortunately, ORVs can be heard form very far away when one is hiking in a naturally quiet place. I have also witnessed the damage that ORVs have inflicted on stream banks and “off-trail” areas in Tenmile Canyon. Please reconsider your preferred alternative so that it will protect the riparian, archaeological, and wilderness values of this area.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Joel	Koedoot	673	4	Professor Creek: Your preferred alternative drops	See response to comment 124-88.

				Professor Creek from Wild and Scenic designation even though it is eligible. Professor Creek / Mary Jane Canyon is quite a popular hike and a real favorite of mine – with canyon narrows, a waterfall, waterslides, and pools. Please reconsider your preferred alternative so that it will include Wild and Scenic designation for Professor Creek, in order to protect the creek from future water diversions.	
Joel	Koedoot	673	5	Onion Creek – Your preferred alternative drops Onion Creek from Wild and Scenic designation even thought it is eligible. Onion Creek is no less deserving of protection than its neighbor, Professor Creek.	See response to comment 124-88.
Joel	Koedoot	673	6	Beaver Creek – Your preferred alternative drops Beaver Creek from Wild an Scenic designation even though it is eligible. I have hiked into this remote creek only once and was very impressed by its vibrant riparian zone, seemingly untouched by human impacts. It is very rare to find such an intact riparian zone in southeastern Utah. Please reconsider your preferred alternative so that it will keep this area closed to grazing and bestow upon it the status it deserves – for it is both truly wild and highly scenic.	See response to comment 124-88.
Joel	Koedoot	673	7	I would also like to comment genrally on the DRMP as it relates to designated ORV routes. Your preferred alternative designates a spaghetti-like tangle of ORV routes across the world-renowned scenic public lands surrounding Moab. Maps of the proposed routes near Moab clearly show that ORVs will be able to drive to within a short distance of just about anywhere; in other words, non-motorized recreational users will find it difficult to get away from ORVs on the vast majority of BLM lands near Moab. This plan is ill-conceived and will unnecessarily promote conflict between motorized and non-motorized	See response to comment 122-9

				recreational users. Please reconsider your preferred alternative so that it will reduce the destructive, redundant web of ORV routes and will protect the quiet, natural backcountry experiences of traditional non-motorized users.	
Justin	Reece	675	1	Fences around cottonwood trees: This is completely unnecessary and takes away from a lot of the area's natural magic. The best thing that can be done for the cottonwood's is to remove the invasive tamarisk. Fences solve nothing for the long term health of the Cottonwoods.	See response to comments 208-3 and 479-6.
Michael	Ciscell	677	1	The current timeframe for responding to your plan is very limited, given the nature of the material, the scope of the uses proposed, and the length of time the resulting plan would be in effect (a long time). In order to read, much less formulate responses to, your Mgmt plan , I request that you extend the comment period for another 3-6 months.	See response to comment 124-1
Cris	Robertson	678	1	The proposed amendments are difficult for me to review and fully understand, however many familiar trail names I have enjoyed using jump out at me. It want to continue using routes such as Strike Ravine, 3-D, Gemini Bridges, and the Flat Iron Mesa as they exist now.	See response to comment 206-11
Tom	Mandera	679	1	The Easter Jeep Safari is a popular event for myself and my friends. I believe that some portions of Flat Iron Mesa, Strike Ravine, and the 3-D Trail have been left out of the new travel plan. These trails include the following segments: Flat Iron Mesa: 1. From about 4246450 N 636300 E heading NW to the pipeline road 2. From about 4245600 N 634700 E going SW to Plan trail 3. From about 4246200 N 63400 E going SW to the county B road 4. From about 4242400 N 63400 E south then east to plan road	See response to comment 206-11

				Strike Ravine: 1. A portion of the "big ugly" hill at about 4254500 N 636600 E 2. The north-to-south section accessing and traversing the property purchased by Kiley Miller (note: San Juan County has continuously supported this right-of-way claim in court). 3-D Trail: From about 4285900 N 609900 E north then west to 4286400 N 609300 E	
Tom	Mandera	679	2	Gemini Bridges is a popular destination for my family and I'm saddened to see that it's proposed for closure. It's hard to imagine much resource damage to rocks from vehicles.	See response to comment 206-14
Tom	Mandera	679	3	I don't see a need to decrease the number of participants allowed in a non-permitted group, unless this is either an attempt to generate additional revenue, or to punish large families and recreation groups.	See response to Comment 124-110 and 124-110.
David	Lee	680	1	Keep the route in Westwater WSA open. This has been accessible for years and should remain so.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
David	Lee	680	2	Provide the missing segments to the maps for Flat Iron Mesa, Strike Ravine, and 3-D. These should be included in the final maps.	See response to comment 206-11
David	Lee	680	3	Keep the Gemini Bridges route open. My son and I were in Moab last spring in Gemini Bridges. We met with a group of senior citizens. Several of these seniors would have been unable to fully enjoy the arches as if they were required to hike to them as opposed to driving to them.	See response to comment 206-14
David	Lee	680	4	Special Permits. As part of the Toyota Land Cruiser Association, I enjoy the Cruise Moab events in the spring. I believe that limiting the	See response to comment 123-26, as well as comments 122-22, 124-11, 124-112 , and 124-110 regarding clarification of SRPs policies and SRP group numbers.

				number of vehicles in a group to 24 may be a burden on some clubs and groups that want to run a trail together. Please consider a more reasonable number--say 35 to 40.	The BLM recognizes the benefits of working with clubs and user groups and will seek to streamline permitting wherever possible.
David	Lee	680	5	White Wash Sand Dunes - Please expand the open travel area beyond what is contemplated in Alt C. Please do away with the proposed fee system.	See response to comment 123-35 relating to enlarging White Wash Sand Dunes open area in Alt C of the Travel Plan for the DRMP/EIS. See also response to comment 120-83 concerning enlarging the White Wash area to accommodate dispersed camping. See response to comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes
David	Lee	680	6	The campsite restrictions for vehicle camping on public lands should not be included in the plan. This is over restrictive for public land.	See response to comments 123-8. Dispersed camping is allowed on over 95% of the Moab planning area. See response to comment 120-86 regarding vehicular access to dispersed camping sites.
Ferris	McCollum	682	1	There are a couple of trails on the Utah/Colorado border with access from the Utah side. They are Island Mesa and Wray Mesa. Both of these should be left open.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ferris	McCollum	682	2	Gemini Bridges should not be closed to motor vehicles.	See response to comment 206-14
Ferris	McCollum	682	3	Mill Canyon and Courthouse Wash should be left open.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ferris	McCollum	682	4	The rock fall in the Tenmile Canyon Trail should be removed and opened to all motorized traffic.	See response to comment 211-20
Jason T.	Nichols	683	1	Your open area at White Wash must be expanded. The current proposal is unworkable because it	See response to comment 123-35 relating to enlarging White Wash Sand Dunes open area in Alt C of the

				closes killer hill climb and the areas west of the dunes. Requiring fences and boulders around cottonwood trees and water sources is impractical and ridiculous. We strongly oppose any fee system. We pay enough in registration for motorcycles and ATVs. However, I am willing to support funding if the needs of outdoor enthusiasts are met.	Travel Plan for the DRMP/EIS. See response to comment 208-3 and 479-6 regarding fencing. See response to comment 123-10 regarding the possibiity of a fee system for use of the open area.
Olaf	Kilthau	684	1	Strike Ravine: 1. A portion of the "big ugly" hill at about 4254500 N 636600 E 2. The north-to-south section accessing and traversing the property purchased by Kiley Miller (note: San Juan County has continuously supported this right-of-way claim in court).	See response to comment 206-11
Olaf	Kilthau	684	2	Flat Iron Mesa: 1. From about 4246450 N 636300 E heading NW to the pipeline road 2. From about 4245600 N 634700 E going SW to Plan trail 3. From about 4246200 N 63400 E going SW to the county B road 4. From about 4242400 N 63400 E south then east to plan road	See response to comment 206-11
Olaf	Kilthau	684	3	3-D Trail: From about 4285900 N 609900 E north then west to 4286400 N 609300 E	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Olaf	Kilthau	684	4	I feel that the requirement for Special Recreation Permits should be required for groups of 35 vehicles and over, and that Alt C should be amended as such, rather than the 24 vehicle limit.	See response to comment 124-122.
Olaf	Kilthau	684	5	The Camping Policy in Appendix E should disclose how many campsites would be closed under each alternative, it should also state that existing campsites should remain open unless a closure is necessitated via a lawful public process, and the Final RMP should mandate public involvement to	Public participation has been solicited throughout the land use planning processNo areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates

				establish and manage “restricted camping areas” and or “controlled camping areas.”	existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsites closures depends upon site specific conditions.
David	Stroud	687	1	Mountain bike single-track. The Mill Canyon - Sevenmile Rim biking focus area should be expanded as Mill Canyon-Tusher Rims in order to provide terrain for pedaling.	See response to comment 122-46
David	Stroud	687	2	The Final plan should extend the South Spanish Valley biking area further south toward Black Ridge.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
David	Stroud	689	1	An open area in addition to White Wash could provide a different terrain for everything from bicycle free riding to trails motorcycling to hardcore rock crawling. As 99% of the Moab Field Office becomes limited to designated routes, open areas play an even more critical role for accommodating specialized sports. Perhaps parts of Black Ridge could remain unrestricted for this purpose.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
David	Stroud	689	2	The Sand Flats Recreation Area could adopt special policies to permit slickrock exploration. We support Ride with Respect’s recommendation that mountain bike travel be allowed on any barren rock surface. Slickrock within one hundred yards of a designated route could be open to motorized travel. This two-hundred yard corridor would accommodate the ways that people currently enjoy Sand Flats.	See response to comment 122-42
Janelle	Baird	691	1	I support all of the following rivers being found suitable to become Wild and Scenic Rivers –	See response to comments 124-88 and 124-91, as well as response to comments 213-12 and 213-13.

				Green, Colorado, Dolores, Mill Creek, Professor Creek, Onion Creek, Negro Bill Canyon, and Beaver Creek. The entire Green River is suitable as a Wild and Scenic River. It is vital that the entire Green River be found suitable. The segment from Swasey's down to the confluence of the San Rafael River is spectacular and as the BLM Moab FO has found, possesses outstanding values.	
Tom	Johnson	692	1	I am particularly concerned about the impact of ORV use at a location named Potato Salad Hill on Mill Creek, just outside the town of Moab. As is pointed out in the RMP, less than 1% of BLM administered lands are riparian in nature, and "are often among the first landscape features to reflect impacts from management activities. These habitats are used as indicators of overall land health and watershed condition." The Potato Salad Hill area is one that has seen substantial recent degradation immediately adjacent to Mill Creek, the most important drainage in the Moab RMP that originates in the Moab area. To continue to allow this high impact use in such a sensitive area is an indication that care and protection of the resource is secondary to allowing ORVs to do anything they want.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Seth	Bowers	693	1	I am backing the position of the Utah 4 Wheel Drive Association. The analysis ithis group has done is thorough and ground level. I would ask in my personal interest to keep the user created trail known as Coyote Canyon open.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Duncan	Silver	694	1	All existing roads, trails, and travel ways should remain open to the all the public. The closures to motorized travel will stop our less fortunate public,	The ADA accessibility guidelines do not specify or quantify the type or degree of access that must be allowed on public lands. The ADA does not require that

				the handicapped from enjoying this area. Does the plan address the needs of the handicapped and address the federal ADA requirements?	all public lands be vehicle accessible. In addition, designated recreational motorized routes are an administrative decision and not subject to ADA. However, the ADA accessibility guidelines will be use in construction of any Federal facilities on public lands.
Duncan	Silver	694	2	The camping policy, Appendix E, lacks specific as to where and what kind of camping is allowed in each area. Maps of camping should be detailed for public information, with the camping opportunities clearly defined. Can you provide readable camping maps?	Appendix E outlines areas of controlled and dispersed camping, See responses to comments 123-8 and 120-86 regarding designated and dispersed camping sites. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number depends upon site specific conditions. Dispersed campsites would be signed; however, maps and signage are not land use planning decisions.
Gary	Swank	695	1	Please don't close roads and trails that have been open for many years such as the Gemini Bridges road and the Ten Mile Wash.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Jonathon	Sudar	697	1	The roads traversing Flat Iron Mesa and those around Gemini Bridges are places I enjoy taking my family, I would be very disappointed to lose access to those areas.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Glen	Judge	752	1	I have included maps showing GPS tracks of existing routes for these trails indicated in red. Please add the missing segments to the designated route inventory on Map 2-11-C.	See response to comment 206-11
Zane	Taylor	817	1	Paving the road, and prohibiting OHV's from pavement, has fragmented the trail system. Thus	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under

				OHV's should be permitted to use Sand Flats Road from Hells Revenge exit to the end of the pavement.	Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Zane	Taylor	817	2	Additionally, the 1/4-mile Slickrock route connecting Slickrock Trail with Fins 'N' Things should be designated for two-wheeled use to alleviate traffic along the main road.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Zane	Taylor	817	3	Special policies should continue permitting Slickrock exploration. The Moab Field Office Off-Highway Vehicle Travel Map states that "Two-wheel motorcycles are allowed on established Slickrock riding areas in the Slickrock Trail. Bartlett Wash and Tusher Canyon areas and on Slickrock areas along the Monitor and Merrimac and Lower Monitor and Merrimac trails where such use does not further disturb vegetation or soils" (dated March 8, 2001 as part of emergency restrictions). In these areas, travel could be further restricted, but not so drastically as the Draft RMP intends. Mechanized travel should still be allowed on any barren rock surface. Slickrock within one hundred yards of a designated route could remain open to motorized travel, except for Tusher Slickrock, which would be reserved for non-motorized use. This two-hundred yard corridor would accommodate the ways that people currently enjoy slickrock areas.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Zane	Taylor	817	4	The Black Ridge area presents many potential recreation opportunities nearby Moab. The South Spanish Valley Mountain bike area could be extended to include part of Pole Canyon. This augments the varrity of terrain, and provides	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to

				enough room for a full-days ride. Sweeping travel restrictions associated with the Draft RMP warrant designating an area for specialized sports which depend on unrestricted areas. Durrable and irregular terrain that is suitable for motorcycle and bicycle trail riding exists in Pole Canyon from the powerlines to Area BFE. In the same vein, a rock crawling area could be established on Black Ridge east of the powerlines. This area is littered with old mine roads, and is currently open to cross-country travel. The site could be limited to designated rock crawling routes, and adopted by local clubs. West of the powerline, the north flank of Black Ridge could be designated for equestrian use, as the backdrop to a residential area. The south flank could be a bicycle free ride area, since it provides one thousand feet of vertical relief, and graded roads for shuttling. Kane Creek is a dry wash from Highway 191 up to the Black Ridge Road. It should be open for OHV's to create a loop with Behind-The-Rocks while avoiding the highway.	resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	1	No roads are included in WSA's. Shouldn't plans consider the event that some WSA's may be "released" rather than "designated"?	Should WSAs be released from such status, a plan amendment would have to be prepared. At that time, routes available for motorized use would be identified.
Ber	Knight	818	2	AGATE: For connecting purposes, shouldn't we keep the good NE-SW pipeline road (perhaps as "Frontage Road") that joins the major road at its northeast end about 4328400 N 655200E (NAD27 CONUS). {Apparently excluded is a short segment needed for continuity going southwest from about 4320000 N 659000 E. There is a disconnect about 4223000 N 655400 E (disconnected on Alt. D, as well) where the included road near the the old railroad grade road seems not to meet an included road to the northeast. Although the road on the northwest side of the railroad tracks does connect (despite a rather abrupt wash crossing) to roads	See response to comment 206-11

				on both sides of the tracks.}	
Ber	Knight	818	3	ANTONE CANYON: Some of the roads in the southeast quarter of the quad make efficient connections, especially to the road above the first rim (in Alt. D).	See response to comment 206-11
Ber	Knight	818	4	BAR X WASH: The road up Winter Camp Draw does connect at about 4348800 N 663300 E (see Bitter Creek Well) and could be well included.	See response to comment 206-11
Ber	Knight	818	5	BIG BEND: {The spur to an overlook on Dry Mesa at about 4283200 N 633700 E is worth the whole trip}. Opening thwe road into Cache Valley wash from about 4287200 N 634400 E and some of the wash is worthwhile (senic upstream, access to view and hike to Cache Arch downstream).	See response to comment 206-11
Ber	Knight	818	6	BIG TRIANGLE: Why not lower Coats Creek? There are some fine roads to consider in case the Westwater WSA is not designated: North of the river going southwest and including a road into Big Hole, and espically, on the south side of the river as far as Star Canyon.	See response to comment 206-11
Ber	Knight	818	7	BITTER CREEK WELL: The road from about 4240700 N 666200 E going east through a SITLA section to the Rabbit Valley Interchange (in Colorado) is a valuable connection. {Why is the road up Winter Camp Draw not included? It connects in Bar X Wash (included in Alt. D). An important connection from a dugway west from about 4336100 N 663200 E appears to be excluded, denying access without driving the dugway}.	See response to comment 206-11
Ber	Knight	818	8	BLUE CHIEF MESA: {No terrible problems, but the continuation of the dead-end road from about 4296500 N 657900 E to the west on the southwest side of Scharf Mesa was a fine experience to drive, as well as the road through Buckhorn Draw from about 4302900 N 658400 E. Both of these	See response to comment 206-11

				roads were considered to have impasses during inventory, but they can be traversed with good equipment and determination (making it more fun)}.	
Ber	Knight	818	9	BOBBY CANYON N: I got about 3km farther up Left Hand Tusher (in Alt. D), but was thwarted by rockfall in Naylor Canyon.	NRR
Ber	Knight	818	10	BOBBY CANYON S: Upper Coal Canyon (seems to be in "closed" area) is interesting, having some apparent historical use for locals gathering coal (a bit is in Tusher Canyon).	NRR
Ber	Knight	818	11	BRYSON CANYON: Saddle Ridge (west side of quad) seems like a nice view area to the dead-end. Why not?	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	12	CALF CANYON: A few connecting roads could be considered arount Pinto Wash (in Alt. D).	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	13	CISCO SPRINGS: A few roads below the Book Cliffs are worthy of consideration; e.g., one going west from Corral Canyon Bench and one going past Strychnine Pond. {Starting at 4320300 N 636900 E, a connection toward the north (only about 500 meters) is excluded (it's in Alt.D)}.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	14	CISCO SW: Some roads in lower Fish Seep Draw are interesting enough to keep. Some of the included roads in the Poison Strip area are very-to-extremely faint and of questionable value.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to

					resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	15	CRESCENT JUNCTION: Why not access to the nice ride to the D&RGW radio tower; the road leaves 1-70 at an "informal interchange" at about 4309600 N 698200 E to die tower at about 4310900 N 698900 E? Numerous access to the railroad are ignored. {A seis line is included continuing straight (roughly west) at about 4313800 N 604300 E, where the original route meets some bad washes and is not being used (Oct. '07); the inventoried parallel route just to the south is in good condition and considerably used.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	16	DANISH FLAT: Missing are two worthwhile roads3 on Cisco Mesa, one to a dam, one to a DH. Why is pipeline road here included but not elsewhere (see AGATE)? Ditto old railroad grade? In the northeast corner at roughly 4330500 N 650500 E, the old railroad grade appears to be included, but the bypass (which must have been made for a reason) is not.	See response to comment 206-11
Ber	Knight	818	17	DEE PASS: We wish for some connections in the vicinity of 4298000 N 591000 E although the transient (due to flooding) nature of some gully crossings makes it hard to define exact routes. {We would like access to a challenging road (in SITLA) going west from the Duma Point road about 4295900 N 592500 E3.5 and climbing northerly to a dugway to about 4296000 N 591400 E	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	18	DEWEY: The USGS-mapped road that meets the Owl Draw road at about 4300800 N 642400 E is essentially invisible, and I can't tell if it or another merely poor road is the included road, which would be ok. Possible useful connection to tie roads together is a short E-W road at about 4299300 N 641500 E3. Fun-to-explore	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				roads to Roberts Mesa top3 and along Dolores River down from Roberts Bottom are missing. {Road with dugway down west side of Hotel Mesa from about 4298400 N 650100 E3 to a defunct placer gold operation with historic equipment at about 4299300 N 649000 E. The included road going south from 4301564 N 643464 E is difficult to find (I missed it on GPS trips in '92, '95, '98, '05 and found it with determination in '07) and may not have been machine constructed; a better choice for connections is the road going south from about 4301300 N 642700 E3 to about 4298800 N 642200 E3 with a junction at about 4300200 N 642600 E3 with a road going east to join the aforementioned included road at 4300641 N 643501 E. The latter roads are on the USGS map; the included road is not.}	
Ber	Knight	818	19	DOLORES POINT N: The spur from the river up Beaver Creek is a good start for hiking and perhaps horsebacking. (See also: Fisher Valley re dead-end road on N. Beaver Mesa.) {For connections to and from Colorado, we should keep two E- W roads about 4276800 N5 and 4278100 ~, both about 668300 E.}	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	20	DOLORES POINT SOUTH: The road going west from about 4276000 N 668300 E is significant access to Colorado roads.3 The road from a mine to the Forest boundary about 4276200 N 665000 E (in Alt. D) continues east in the Foresf and is interesting despite its grown-over condition.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	21	DRY CANYON: Why not access to Pear Park Gas Field3? The road climbing out of Bull Canyon3 (4355800 N 646700 E) was blocked by rockfalls at the time of my visit, but it has all the elements of a scenic, challenging, and exciting	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to

				ride (I am told it used to be maintained, but is not passable by a road grader now).	resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	22	DUBINKY WASH: {We believe a useful connection into Tenrnile Wash is at "Texas Bob Dugway," once a challenging sandy climb at 4287000 N 587500 E3A but now bypassed directly into the wash just below a fairly new cattle guard (!) at a fence line. A NE-SW seis. line is shown in the inventory as discontinuous at a wash crossing about 594000 E 4287000 N. In fact, if a straight-line route at that crossing was ever used, a constructed bypass was in use at least when my GPS data were gathered in October 1994, May 2003, and October 2007. That (excluded) route was much the best way in 2007, rather than the included way from the south, which was in very poor condition, not being used, and even difficult to find in 2007. }4A As a separate issue, the same seis line is interesting where it continues NE to near the cliff at about 596000 E.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	23	EIGHTMILE ROCK: A fairly long spur goes NE from about 4245500 N 624600 El; (this is appropriately named "Behind the Rocks Overlook" on Barnes' Canyon Rims Rec. map and is of value for touring and exploring). There is a nest of roads, virtually all in SITLA, having recreational value in and out of an interesting canyon in the vicinity of 423700 N 621000 E1, but short BLM access roads are needed; preferred eastern access is from 4237200 N 622100 E and a western access is from 4236700 N 620000 E (on Lockhart Basin quad) (other west accesses could be chosen).	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	24	FISHER TOWERS: Several BLM roads in Professor Valley, roughly 4281400-4285000 N 642000-645000 E are pleasant to visit, and	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel

				sharing with other users should be considered.	routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	25	FISHER VALLEY: On N. Beaver Mesa, the included road ends about 4287700 N 662100 E3 where the road continues up to a ridge and dead-ends -scenic possibilities. {The included road at about 4281100 N 655600 E enters private property, effectively denying on access to BLM roads farther south, while a parallel public road3 just to the east is excluded.}4A Some BLM roads in the south end of Fisher Valley are fun to explore.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	26	FLOY CANYON N: With only one mile of D road (not reservation) on the whole quad, why can't we have Showerbath Canyon3, if only for the name?	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	27	FLUME CANYON: We wish the cherry-stem could be extended somewhat farther into Diamond ~anyon; it can be challenging to drive but beautiful (in Alt. D).	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	28	GOLD BAR CANYON: We consider the route to and across Gemini Bridges an important rare treat for motorized users.3A We'll miss the spur to beneath Gemini Bridges (picnic spot), but we understand the problem. The road on Amasa Back from about 4265500 N 618300 E to above The Billboard is challenging fun for driver and navigator. My data show "no gate" at the State Park boundary about 4265200 N 610600	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				E, making the BLM road rather useless. Old mine roads, often interesting to visit, about 4275700 N 616000-617000 E3A are have value for recreation. {Beginning at the junction of the Gemini Brides road and the road south to Bull Canyon bottom, Alt. C shows three spurs from the Bull Canyon road, apparently departing at about 4272660 N going east, 4271500 N going east, and 4271100 N going west. Having not found tltese spurs in previous inventories, r searched again Nov. 8 & 19, 2007, possibly seeing evidence of two of tlte tltree. I also searched from tlte west end of one (I've been told it connects tltrough) and found only scattered A TV tracks off of tlte visible road. In tltis heavily visited area, tlte absence of usage on these spurs reenforces tlte notion that tltey are essentially invisible and suggests tltat they are not very important. I suggest that these tltree be deleted from Alt. C ; hard-to-find roads in popular areas b~get off-road tracks.}	
Ber	Knight	818	29	JUG ROCK: {RMP maps in the vicinity of Big Mesa campground do not match current activity. Alt C includes some roads that are now posted closed, some roads that are being "rehabbed," one road spur tltat has disappeared, and one road soutlt of UT-313 that I have been unable to find.	See response to comment 206-11
Ber	Knight	818	30	KANE SPRINGS: There is a rocky, small canyon loopl just north of tlte Black Ridge road, beginning and ending about 4252350 N 637380 E, called "Coyote Canyon" by rock-crawling entltusiasts; tltis is one of the places that can divert extreme four-wheelers away from creating new routes along better-known, heavily traveled trails. (A map copy is attached.) The spur running N-S toward Kane Creek at about 633000	See response to comment 206-11

				E terminates before its time (about 4250900 N), considering viewpoints.1 A connecting road going from about 4254000 N 632500 E northeast to an obscure junction at about 4256000 N 633700 E1 ha~ some slickrock and is fun to drive, and it offers a long bypass to the daunting crossing of "High-Dive Canyon" on tlte Behind tlte Rocks trail. It passes a less important, hardly used connecter, which includes a steep dirt hill, from about 4255150 N 633000 E going north to cross an included road. {Missing are two portions of the Jeep Safari Strike Ravine trail. (1) The N-S road accessing and traversing tlte contentious private property (where San Juan County supported tlte road claim!). (2) A portion of the "big ugly" hill at roughly 4254500 N 636600 E.}	
Ber	Knight	818	31	KLONDIKE BLUFFS: {I have been unable to find tlte road going SW from about 4299600 N 618700 E; tlte combination of its unused condition and its questionable status witltin Arches N.P. (tlte county inventory stopped at the boundary) make its inclusion in Alt. C moot. Missing is a vital tiny part of "Klondike Bluffs (bicycle) TraIl" access going NE at about 4291900 N 611600 E3 and its shortcut used by "Copper Ridge Trail".}	See response to comment 206-11
Ber	Knight	818	32	LA SAL EAST: There are two largely scenic routes that also provide north-south access in tlte SE quarter of tltis quad tltat should be preserved (both were seriously machine-made roads, but labeled "pack" by USGS). The western one is included, but ironicaliy, is currently nearly impassable (large rock, huge "Pondie", and BRUSH!). We drove it painfully 6/1/07; it could be salvaged witlt some volunteer work. The eastern route, which splits into multiple roads at	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				about 4238500 N 661600 E3, is in good condition for 4WD, but is excluded. This route is coded "non-motorized" in tlte San Juan County Map Book; we would like to know why.	
Ber	Knight	818	33	LA SAL JUNCTON: I expected inclusion of a pretty good road going east from Hwy. 191 about 4245200 N 636900 E to join included roads -even the terminus of one of the included roads. I suggest keeping the road from about 4244800 N 632600 E going north (to complete a loop witlt an included road) to the county B road at about 4245650 N 632600 E1. {Four portions of tlte Flat Iron Mesa Jeep Safari trail are not included: (1) From about 4246450 N 636300 E jiggling NW to the pipeline road. (2) From about 4245600 N 634700 E going SW to an included road [this popular route may not be in the permit]. (3) Although this now-faint section has not been used recently (in favor of the county B road), from about 4246200 N 633400 E going SW to meet the county Broad. (4) The loop around the south side of "Hammerhead Rock" from about 4242400 N 633400 E south then east to the included road.}4 Again, including roads through a not-gated fence is confusing. In this area, an included road segment that looks like a short-cut (from about 4242500 N 634400 E to about 4243300 N 634500 E) has been in very poor condition and has no redeeming values to merit inclusion, in my opinion.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	34	LISBON GAP: Are we trying to keep Utah people in state or keep Colorado people out? I count two important accesses and three useful but less important that are not included! A really fine trip is to circumnavigate the Colorado part of Island Mesa beneath its rim. As near as I can	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring

				tell, the Colorado roads are in the Uncompaghre F.O., which limits travel to existing roads, suggesting that access is valuable. One can start a counter-clockwise loop from the main E- W road in Colorado and reach the N-S road east of Island Canyon by either a poor road that joins at about 4227100 N 670300 E1 or a decent road that joins at about 4228100 N 670050 E2 near the rock-house ruins. The "poor road" makes an interesting connection but is so little used that it is hard for me to defend, but the "decent road" is valuable as part of the loop. Neither road is on the "San Juan County 7.5 Minute Map Book". From about 4233250 N 669600 E, a strong road2 goes basically east to access the many old roads of Ray Mesa. An included seis' line goes NNW dead-ending near the Colo. line, but an interesting road departs northeast from about 4223800 N 671200 E1, and branches south then east into Colorado and back to the main road (useful). Travel downstream in Greasewood Canyon bottom is fascinating for the drive and scenery, although continuation into Colorado (once all the way to the Dolores River) is now limited. I note one consequence of the fat lines on the map; some roads that are not continuous may appear to connect (e.g. 4227900 N 667300 E had no connection at the time of my inventory).	and site specific NEPA analysis.
Ber	Knight	818	35	LISBON V ALLEY: On Three Step Hill there is a dead-end(core drill) road that departs NE from included roads at about 4221300 N 662900 E1 offering excellent views to the north (if you like to see the copper mine). Only partly included is a pleasant drive along the ridge on the NE side of Lisbon Valley from about 4231700 N 656600 E to about 4225100 N 562900 E1 with	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				a connection NE to included roads.	
Ber	Knight	818	36	LOCKHART BASIN: Worthwhile further views are to be had on an extension of about a quarter mile beyond the B road at about 4338400 N 615000 E1. Barnes' "Kamikaze Trail" has a spur running SSE-NNW ending about 4243700 N 620000 E1 that is worthwhile for another view of Lockhart Basin.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	37	MARBLE CANYON: For access to and from Colorado roads; two roads (one of them forking farther south) start at about 4211100 N 668700 E3 go southerly then easterly, and one southerly extension crosses and re-crosses the border. (What are isolated roads north of Picture Gallery Ranch?	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	38	MERRIMAC BUTTE: We think the road through Mill Canyon3 going south from the Mill Canyon Dinosaur Site as well as the N-S road on the west side of Courthouse Rock connecting to near the old stage station3 are important for the scenic experience and some challenge in driving in the canyons. We would like: the road on NE side of Merrimac Butte completing circumnavigation of butte, and the road heading SE from about 4277800 N 617200 E3 to the NP boundary (for hiking access through a pedestrian "maze ") .{Not included is the part of 3D Trail from about 4285900 N 609900 E3 north then west to 4286400 N 609300 E}3,4. The included road that connects to the 3D Trail going southwest from about 4286900 N 610100 E appears to be user created and has little merit.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	39	MINERAL CANYON: The ride up Mineral Canyon is a desirable experience past the SITLA section, despite impasses on original road that can be bypassed in the wash bottom.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to

					resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	40	MOAB: The spur to parking for Halls Bridge hike (4263600 N 625600 E3) not shown, although. few hikers are likely to drive there anymore Looks as if the road through SMM Wetlands is includeds (as well as the road on S side of tailings pileS).	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	41	MOLLIE HOGANS: {To complete a gorgeous scenic loop, the short NE-SW road that reaches the NP boundary at about 4294800 N 623400 E3 should be included (Alt. A inventory shows a discontinuity; my 1994 data are continuous, and a revisit in 2007 finds a decent road all the way). Be aware that the road that enters Salt Wash at 4297827 N 623160 E has virtue as a connector but is faint at best and fully obscured by deep brush in Salt Wash (2007).}	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	42	MOUNT TUK: "Ride with Respect" has proposed devoting an area near Yellow Circle l)1ines to rock crawling activity. As with the "Coyote Canyon" loop, such a designation would help preserve other established trails that are more oriented toward touring.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	43	PR SPRING: At the time of my visit (1996), the road in upper Middle Canyon (above 4360700 N 645300 E) was "not seen" and the included side canyon was blockaded.	NRR
Ber	Knight	818	44	RAY MESA: No significant problems, but it would be desirable to include a Colorado access below the cliffs (access to a dam and pond plus other connections in Colorado) going SE from about 4242700 N 669700 E; there is no other nearby access to this road.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

Ber	Knight	818	45	RILL CREEK: Porcupine Rim jeep/bike trail included only to WSA boundary; motorized cannot reach start of single-track and beyond (to maintain the single-track junction and to find lost bikers who ignored the junction!). Would like the scenic spur going NW starting at about 4263700 N 638000 E3A; and another short spur to access "old mail trail" at about 4265900 N 638000 E.3A Could the road west from Coffee Pot Rock'A be included in case the WSA is not designated, or at least to the WSA boundary (I used it as part of a Labor Day Camp-Out trail in 1985)? A challenging, scenic, and fun-to-drive spur to the rim starts about 4274900 N 637800 E1. Why not road SE to overlook starting about 4270000 N 635830 E3?	See response to comment 122-46
Ber	Knight	818	46	SAGERS FLAT: A dead-end road giving westerly access from about 4213900 N 627900 E excluded (even in Alt. D), but its good condition suggests some usefulness. I wish we could use the roads along the RR tracks; how else could we access the old railroad grade, along with other disconnected segments, that appear on Alt. D? {Something seems strange near 4209000-42010000 N 620000 E: A discontinuity (apparently at 4209500 N 619800 E where there is a washed-out, deep wash crossing) near the SITLA section. The included road has become invisible in places; I was able to find very little of it in Oct~ '07. Some better new roads access some dam work near there, but best access seems to be from an excluded road going SW from about 4210000 N 620800 E, then another, perhaps new, road to the west. In this area of deep washes, the only active (passable) wash crossing we found (in '07) was at about 4209100 N	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				620200 E. See also Thompson Springs. }	
Ber	Knight	818	47	SANDSTONE: No significant problems, but there are many old mine roads that are fun to explore.	NRR
Ber	Knight	818	48	SHAFER BASIN: An included road is only the beginning of a wonderful spur going south from about 4258300 N 611900 E continuing south and reaching a scenic bench across from Chicken Corners, with foot access to area of in-matrix petrified wood about 4256900 N 611700 El (mentioned in Barnes' guide book) just above a historic drill site beside the river.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	49	SOP CANYON: No significant problems. For possible inclusion, is a strong road angling 450 NE-SW from about 4219350 N 663500 E and connecting an included road to the continuation of an included road into the Monticello F. O. (it has a short spur to a stock pond).	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	50	STEAMBOAT MESA: {We use (permitted for Dolores Triangle trail) the tiny EW shortcut at about 4295500 N 668000 E.}	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	51	TEPEE CANYON: Cottonwood Canyon is an adventure -more than I undertook (in Alt D.)	NRR
Ber	Knight	818	52	THOMPSON SPRINGS: Blaze Canyon3 might be worthwhile. {I re-visited and found (absent from my earlier inventory) the included seis line going northeast from about 4306000 N 617500 E, where there is an impassable gully, reachable via a (cross-country?) bypass beyond the gully. The included line basically reaches recent dam construction on the Sagers Flat quad.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				This line is parallel to an excluded line just southeast of it, but the excluded line is a better road and the 'dozer-tracks (possibly a pre-existing route) that reached it northeast of the included connection seems the better way.}	
Ber	Knight	818	53	TROUGH SPRINGS: In the vicinity of an oil tank near 4254000 N 624000 E are two roads going northeast to canyon rim views; one, the more southern, is worthwhile. There is a "seismic mesa lite" at about 4253000-4254000 N 628000-629000 E with access roads from north and south -not great recreation significance and surely needing no more than one of the seis lines to complete the loop, but interesting country to visit. I'll miss having access to a loop that reaches east to about 4258100 N 629300 E, although some spurs are trivial. The "Cane Creek Canyon Rim Trail" (Barnes) continues beyond the proposed end about 3/4 mile to other excellent views (it was apparently for core drilling above mines in the canyon).	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	54	VALLEY CITY: Seems reasonable access in an area of (my observations) "v. faint" and "x. faint" roads, which are, at best, very and extremely faint. {Includes Canyonlands Airport runway?}	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	55	WARNER LAKE: {Includes a road (not on my inventory) going SE from about 4272200 N 644100 E, entering private land but excludes a parallel road about 300 meters NE.}4A	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	56	WESTWATER: Is the BLM teasing us with the road (through private and to private) along the	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under

				Little Dolores River, then out to the Colorado River, where there is no public access?	Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Ber	Knight	818	58	WINDOWS, THE: {Just to improve credibility of the map, it would be desirable to remove the foot trails to Double Arch, Delicate Arch, Park Avenue, and Tower Arch, and in the MOLLIE HOGANS quad, the Devils Garden trail (the foot trail to landscape, Double O, ad Fin Canyon was already removed!)	See response to comment 206-11
Marc	Reynolds	819	1	Alternative D fails just short of providing sufficient motorcycling opportunities. Since no single-track inventory was performed, the BLM should continue accepting data on existing routes, and consider them for implementation.	See response to comment 122-14.
Marc	Reynolds	819	2	The Utah Rims single-track network should include at least 25 miles of additional routes, in order to be as complete as the Dee Pass network. In particular, long-distance single-tracks and rugged roads that connect SRMAs offer a unique experience.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Marc	Reynolds	819	3	The Copper Ridge Motorcycle Loop should be combined with Thompson Trail in the Final Plan.	See response to comment 122-29
Marc	Reynolds	819	4	A few more washes should be left open, especially in the Cisco Desert. These travel-ways provide ATV and motorcycle riders an unconfined challenge that roads cannot.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Marc	Reynolds	819	5	The Sand Flats Recreation Area could adopt special policies to permit slickrock exploration. We support Ride with Respect's recommendation that mountain bike travel be allowed on any barren	See response to comment 122-42

				surface. Slickrock within one hundred yards of a designated route could be open to motorized travel. This two-hundred yard corridor would accommodate the ways that people currently enjoy Sand Flats.	
Marc	Reynolds	819	6	BLM's open area at White Wash Sand Dunes should include the popular and challenging hill-climb on the Northwest of the Sand Dunes. BLM's open area should be located along easily identified geologic features, or preferably along boundary roads of Ruby Ranch Road on the West, Blue Hills Road on the North, and Duma Point/Ruby Ranch (backway) on the East.	See response to comment 123-35
Charles	Stembridge	820	1	I know that one of the biggest objections to motorized vehicle use by others is the noise from unmuffled engines. On suggestion then is to create noise limits for OHV's if 90 db is the limit, responsible OHVers will find a way to keep the noise down.	See response to comment 122-7
Charles	Stembridge	820	2	Another objection to both bicycle and motorized vehicle use can be a speed conflict. If the BLM imposes a speed limit, responsible OHVers will be willing to maintain speed limits as needed.	See response to comment 122-9
Fred	LaRoque	821	1	I understand all of the Green River is suitable as Wild and Scenic. Apparently there is some discrepancy about the suitability (from Swasy's to River Mile 97) between the BLM Price Field Office Draft and the BLM Moab FO Draft. The Moab FO should support the decision of the Price FO.	See response to comment 124-91.
Steve	Speidel	822	1	I support keeping motorized travel open in the following places: White Wash: This is a sandy area and impact is minimal. Pit toilets and an info kiosk would help. 10 Mile Wash: This is also very sandy trail and impact is minimal.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				Monitor and Merrimac Area including Bartlet Wash, Tusher Canyon, Dubinky Rd Sovereign Trail The Poison Strip Rabbit Valley Colorado San Rafael Reef Indian Creek	
Mark	Weaver	823	1	In particular, all of the alternatives for the White Wash Dunes area are ill-thought out. This is an important and heavily used area for off-road vehicle recreation, and there is little conflict with other actual users. The open area of the White Wash Dunes in alt C and D is far too small for the use the area receives. It must be expanded to include all the traditional open-use area, and the boundary must be located along easily identifiable geologic features and/or roads, so that it is clear to users on the ground.	See response to comment 123-35
Mark	Weaver	823	2	I think the BLM is making a mountain out of a molehill regarding “user conflict.” I have been bicycling and hiking there for many many years, and I have had no issues with motorized users. Likewise, in my motorized recreation there, I have had no issues with non-motorized users. In my opinion and experience, the “user conflict” issue is one that has been manufactures as an excuse to further restrict motorized recreation.	The BLM's responsibility is to address recreation conflicts that occur on BLM lands, and to allocate among varying types of recreation users. User conflict was an issue raised by the public during the scoping period for the DRMP/EIS. The general nature of societal conflicts is not a land use planning issue Education and signage are all administrative actions and do not require land use planning decisions.
Mark	Weaver	823	3	Designation of the White Wash area as an ACEC in Alt B. This is an area of longstanding sustainable motorized use over many decades, and there is no basis for the caving in to the desires of extremists in designating the area as an ACEC.	Alternatives A, C (the preferred Alternative) and D do not designate White Wash as an ACEC. Refer to response to comment 124-69.
Mark	Weaver	823	4	The second issue is the continuing and never-ending poush for more (and more inappropriate) wilderness designations. The BLM was given a very clear mandate in FLPMA regarding the	See response to comments 120-8, 121-10, 121-58, and 121-61.

				inventory of wilderness-quality lands. This clearly mandated process was completed over 15 years ago. There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing Wilderness inventory and review. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American people. Other than the management of existing WSA's, the BLM should have no further part in this issue.	
David	Rogers	824	1	Since these lands have been recognized as having wilderness potential by the BLM (and many other individuals and organizations, of course) they should be managed as wilderness until final decisions are made regarding their inclusion in formally designated wilderness areas. Therefore, they should be closed entirely to (1) motorized vehicle use on or off existing roads/routes; 2) minerals, oil and gas exploration/development; and 3) livestock grazing.	The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Any Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the management prescriptions established in the RMP. These Non-WSA lands have many resource values and use in addition to wilderness characteristics. The DRMP/DEIS considered all available information and a range of alternative prescriptions for how these values and uses would be managed. For example, in Alternative B, most of the Non-WSA lands are open to oil and gas leasing subject to standard lease terms and conditions. While Alternative C is designed to provide maximum conservation and protection of natural resources from resource development and use. Under Alternative C, some Non-WSA lands with wilderness characteristics would be closed to leasing and most Non-WSA lands with wilderness characteristics would be leased subject to either minor operational constraints like timing limitations or controls on surface use, or major constraints like no surface occupancy. Alternative D reflects existing

					management direction, and Alternative A (the Preferred Alternative in the DRMP/DEIS) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.
Bill	Farley	825	1	Management objectives that use such things as primitive recreation zones, Areas of Critical Environmental Concern, and so-called "areas with wilderness character" to create a de-facto Wilderness management are unlawful.	See response to comments 120-8, 121-10, 121-58, and 121-61.
James P.	Lynch	826	1	In the time available for review of the document, I did not find a discussion of air or water pollution in the alternative discussion. I submit that these will be a problem that should be addressed in considering more intense alternatives, such as C and D.	Analyses of impacts on air quality and water resources are included in Chapter 4 of the PRMP/FEIS. A statement has been added to Chapter 2 of the PRMP/EIS, under Management Common to All, which states the following: "As appropriate, quantitative analysis of potential air quality impacts would be conducted for project specific developments.
James P.	Lynch	826	2	In the time available for review of the document, I did not find a discussion of air or water pollution in the alternative discussion. I submit that these will be a problem that should be addressed in considering more intense alternatives, such as C and D.	Impacts to air quality and soils and watersheds are discussed in detail in the DRMP/DEIS in Sections 4.3.1 and 4.3.13, respectively.
Jon	Kis	827	1	I support keeping motorized travel open in the following places: White Wash: This is a sandy area and impact is minimal. Pit toilets and an info kiosk would help. 10 Mile Wash: This is also very sandy trail and impact is minimal. Monitor and Merrimac Area including Bartlet Wash, Tusher Canyon, Dubinky Rd Sovereign Trail The Poison Strip Rabbit Valley Colorado San Rafael Reef Indian Creek	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

Frank	Ress	828	1	I spent over 3/4 of an hour putting in comments on your web comment form for the Moab RMP, click the submit button, and get an "address cannot be found" error, or something like that. Of course, when I hit the back button, everything is gone.	We apologize for the inconvenience.
Michael	Edwards	829	1	In addition, you should treat wilderness eligible lands as designated wilderness, until a decision is made to take those lands off the wilderness eligible listing.	The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Any Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the management prescriptions established in the RMP. These Non-WSA lands have many resource values and use in addition to wilderness characteristics. The DRMP/DEIS considered all available information and a range of alternative prescriptions for how these values and uses would be managed.
Michael	Edwards	829	2	In addition, would you please provide me with an explanation of why exactly you are not choosing the environmentally preferred alternative in this sensitive area?	The DRMP/EIS provides 4 alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping. The BLM acknowledges throughout the DRMP/EIS that Alternative B produces fewer adverse environmental impacts -- that is the expressed intention of that alternative. The BLM, however, is not required to choose the alternative which produces the least environmental impact, but must balance competing resources within its sustained yield, multiple use mandate.
Marion	Klaus	831	1	The preferred alternative in the BLM Moab FO DRMP is inconsistent with the BLM Price FO DRMP for the suitability of the Green River.	See response to comment 124-91.

Don	Peay	832	1	How can the BLM even consider reauthorizing grazing on some of those allotments when sportsmen and the DWR spent millions of dollars to provide for forage for wildlife-the rancherswho left were fairly compensated. Are there any provisions in the RMP to alocate additional forage for wildlife if a grazing permitee wants to allocate the forage for wildlife, or two, if forage is created via rangeland improvements and thus there is more forage available for lifestock and wildlife.	Grazing practices are adjusted on an allotment basis using the Standards for Rangeland Health and the Guidelines for Grazing Management (see Appendix Q of the DRMP/EIS. Site specific decisions are not land use planning decisions
Shawn	Baker	833	1	Moab BLM has always provided a huge number of dispersed campsites. Dispersion allows both users' solitude and also minimizes over-use pressures. Please include more dispersed campsites (or maintain existing counts) in final Alternatives.	See responses to comments 123-8. Dispersed camping is allowed on over 95% of the Moab planning area.
Shawn	Baker	833	2	I also firmly believe that "user conflicts" are more of a perceived than actual problem. I am a mountain biker, hiker, and OHV owner. Trails that are enticing to bikes are not to OHVs, and only somewhat to hikers. Trails that offer challenges and scenic vistas to OHV operators are typically not challenging (or too steep/rough in some spots) for bikes, and uninteresting and wide to hikers. Trails that are already open to hiking are not applicable to OHV use. Potential user conflicts at trail interfaces are easily alleviated with user training and good etiquette.	The BLM's responsibility is to address recreation conflicts that occur on BLM lands, and to allocate among varying types of recreation users. User conflict was an issue raised by the public during the scoping period for the DRMP/EIS. The general nature of societal conflicts is not a land use planning issue Education and signage are all administrative actions and do not require land use planning decisions.
Sean	Lively	928	1	The Final RMP should direct land managers exhaust mitigation efforts prior to closure of any area.	Mitigation can be put in place without an emergency limitation or closure.
Sean	Lively	928	2	Final RMP should also direct land managers to work with recognized groups, such as the 4x4WDA and USAALL, to ensure mitigation efforts have been exhausted.	Mitigation can be put in place without an emergency limitation or closure.
Larry	Hopkins	929	1	Wilderness areas in southeastern Utah do not work because of the travel problems on foot or	See response to comment 121-71. The 1990 Utah BLM Statewide Wilderness

				horse back and carrying enough water- thus the lands will become areas of NO USE.	Environmental Impact Statement (EIS) assessed the relative uses to which the areas now known as Wilderness Study Areas (WSAs) could be put to use. The EIS proposed a range of alternatives, from no wilderness to all wilderness, for the lands in question. The EIS was never acted upon by Congress, and they continue to be managed by the BLM under the non-impairment standard until Congress takes action.
Larry	Hopkins	929	2	In regards to camping you do not tell us the details as to how many areas will be closed or where folks will be able to camp.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsites closures depends upon site specific conditions.
Larry	Hopkins	929	3	The four options need to be reworked and expanded upon with details and the addition of single track trails for mt. biking and motorcycles that have been left out of your planning.	The BLM specifically asked for route information during the scoping period for the RMP. All routes submitted by the public at that time were considered for inclusion in the Travel Plan. See Appendix G for a description of the Travel Planning process. For the addition of new routes to the travel plan, see response to comments 122-15 and 122-30. The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).
Peter	Apicella	930	1	Areas that are greater than one, two, or three miles away from a road are increasingly rare-- this unfortunately makes it more and more difficult to find silence from humans and our machines out on the land. I will remind land managers that the sound envelop/impact for one Off Road Vehicle is significantly larger than the visual impact.	See response to comment 122-7. The commenter is also reminded that the topography of the Moab Field Office means that the one-, two- or three-miles buffer from a road is less important than it may be in a landscape that does not have the topographical variety of the Moab Field Office planning area.
Peter	Apicella	930	2	The Green River non-motorized canoe corridor. People travel from all over the USA and the world	The BLM assessed the impacts on natural resources and recreation conflict between motorized access and

				for multi-day paddle trips down the Green. Its one of the few places in Grand County where multi-day, non-mechanized travel can be engaged in. What a way to impact sombody's immersion in natural sound with the loud, multi-mile shredding, ehco- amplified buzz of an ATV posse.	river based recreation. The BLM determined that the purpose and need associated with the route outweighed the specified conflict.
Brandon	Andersen	931	1	With the focus areas being talked about in the proposal, I feel that a designated "4x4" area would be appropriate. Giving the 4x4 community an area that was designated to rockcrawling and 4-wheeling specifically would not only give those of us who enjoy this type of recreation an area to do so like hikers already have in most of the open areas in Utah, but also give an opportunity to educate about land use and ways in which 4x4 and OHV users can contribute to keeping our public lands open to everyone.	Four wheel drive opportunities are specifically provided for in the Gemini Bridges Motorized Focus Area. In addition, four wheel drive opportunities are available on any of the over 2,500 miles of “D” road designated in the Travel Plan accompanying the DRMP/EIS. Many of these routes (such as Pritchett Canyon and Behind the Rocks) offer challenge to very extreme four wheel drive vehicles. No rockcrawling area is specifically designated in the DRMP/EIS, apart from Potato Salad Hill. However, rockcrawling opportunities are available on nearby private lands. Education is valuable, but it is an administrative action and does not require a land use planning decision.
Brandon	Andersen	931	2	The White Wash Sand Dunes is also an area that I have enjoyed for many years, both as a campsite and just to drive around on in the afternoon. I do not have anything against paying a fee to use an area or camp there, If my fees keep the land open, then I will pay the fees, but the proposed action seems that the area will be closed, and then in the future there is a possibility of re-opening the area after a campgound is built, if the campgoround is ever built. This is unacceptable . The White Wash Sand Dunes is one of the few areas where open recreation will not harm any vegetation. This area needs to remain open, even if a campground is eventually built.	See also response to comment 120-83 concerning enlarging the White Wash area to accommodate dispersed camping.
Kara	Pincock	932	1	Keep Ten Mile Wash and other riparian washes open as they have had use for decades. A great example of why a wash is approiate for motorized use is what happened to Ten Mile Wash in the	See response to comment 211-20

				storm 10 months ago. The area was totally resurfaced by the storm and all use evidence was erased.	
James	Malapanes	933	1	If camping is only dispersed, and we are not allowed to go off of established trails, does that mean we have to camp (or park RV's) in the middle of the road? Or will the "trails" be wide enough to park on the edges, like a highway?	See response to comments 123-8 regarding dispersed and designated camping. See response to comment 120-86 regarding access to dispersed campsites. One of the express purposes of leaving a route open for travel was to provide access to a campsite. If roads to specific dispersed campsites have been omitted in the Travel Plan, they may be added at a future date through site-specific NEPA analysis.
James	Malapanes	933	2	Surly you are joking about fencing off the trees and water sources! What a ridiculous waste of money, not to mention the destruction to the area involved in building the fences. How will the wildlife get to the water or the trees?	See response to comments 208-3 and 479-6.
James	Malapanes	933	3	The White Wash Dunes should be left as is, or expanded. This area recieves a huge number of ATV's and dirt bikers, and should remain as a premier recreation location. Being sand, it does not deteriorate from heavy use like other dirt or grass areas would, and is perfect for riding in the winter time, since it is warmer there. Likewise, the Ten Mile Wash area should be left open to ATV's, dirt bikes, horses, hikers, and anyone else that wants to travel that route. Although it is definitely not a big draw for hikers or mountain bikes due to the sand! It's a beautiful area, but definitely NOT wilderness area potential.	See response to comment 123-35
James	Malapanes	933	4	The number of motorcycle trails in the final version should include at least several hundred miles of trails. I suggest connecting the Copper Ridge and Thompson trails.	See response to comment 122-29
James	Malapanes	933	5	Motorized recreation requires more miles of trails than mountain bikes, horses, or hiking, because motorized travel faster. A normal ATV or dirt bike ride covers 50-70miles, where a normal mountain	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan

				bike ride covers 15-20 miles, and hikers cover maybe 10-15miles in a normal hike.	based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Gary	Clinard	934	1	We have tried to read and study the Moab RMP and have found it to be so long and involved that the general public cannot be expected to understand and be able to preform an informed public review on all the various areas about which they are concerned. It is our belief that this project should be seperated in to two or three areas for study. We oppose the document as written.	See response to comment 123-14.
Gary	Clinard	934	2	It is not clear in the document that the BLM is addressing not only their RMP, but a travel management plan as well. These two different plans should be presented seperately. We oppose the way the document is written	See response to comment 124-71
Gary	Clinard	934	3	The document fails to provide factual evidence to support many of the restrictions placed in all the Alternatives. The document must not make restrictive decisions which are not based on conditions which are confirmed and presented to the public in this document. We oppose making decisions which lack firm facts for their necessity.	Chapter 3 contains information regarding the affected environment, including how the resource or resource use has change over time. A systematic interdisciplinary approach was used to provide accurate, objective and scientifically sound environmental analysis on the environmental consequences associated with the management actions or prescriptions under each alternative. The analysis discloses the direct, indirect and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives. The commentor has not provided specific examples of a decision that seems restriction given the conditions presented in the document.
Gary	Clinard	934	4	White Wash Sand Dunes: a- the boundaries for the area need to be easily identified by visitors. Roads and natural boundaries need to be selected, otherwise there will be an ongoing problem with visitors straying out of the openarea. We oppose arbitrary boundaries unworkable.	See response to Comment 123-35. The BLM asserts that the boundaries of the open area in Alt C (preferred alternative) can be adequately delineated for public understanding.

Gary	Clinard	934	5	b- The area needs to be larger than proposed. This is a popular area and will continue to receive heavy use. Forcing more visitors in to a smaller area will create continuing management problems. If the area is as small as proposed usage will spill over into adjacent areas, especially into areas which have traditionally been used, such as the hill-climb to the northwest. These traditionally used areas need to be included. We oppose these smaller open area proposals.	The commentor is referring to the White Wash Area. See response to comment 123-35 relating to enlarging White Wash Sand Dunes open area in Alt C of the Travel Plan for the DRMP/EIS. See also response to comment 120-83 concerning enlarging the White Wash area to accommodate dispersed camping.
Gary	Clinard	934	6	c- It is a waste of time and money to fence the cottonwood trees and water sources in an open area. We oppose this unnecessary use of BLM time and money.	See response to comments 208-3 and 479-6.
Gary	Clinard	934	7	d- Camping should continue at White Sands as currently allowed until the BLM constructs a permanent, developed campground. It is unreasonable to ban or restrict camping for the length of time it will take the BLM to complete any project. We oppose any camping ban or restriction before a developed campground is providid for visitors.	See response to comment 120-83 concerning enlarging the White Wash area to accommodate dispersed camping.
Gary	Clinard	934	8	e- We oppose any fee system for White Sands which is developed or implemented without detailed input and agreement from the visitors who will be affected.	See response to comment 123-10.
Gary	Clinard	934	9	It is not clear that user conflicts are such a major problem that "exclusive use zones" need to be established. We oppose excluding certain groups fromusing particular areas. This approach unfairly penalizes motorized recreation. Non-motorized remains free to use all public land. Motorized recreation becomes even more limited than it already is. A satisfactory motorized experience means participants cover many more miles in a day than non-motorized, so the creation of more areas where motorized is excluded unfairly	See response to comment 413-9 regarding focus areas and 123-10 regarding fees.

				reduces the opportunities for this legitimate recreation.	
Gary	Clinard	934	10	"Exclusive use zones" do not necessarily mean a better experience for non-motorized. With out access to the interior of these areas, non-motorized use will be limited to the fringes where participants can park their vehicles. Having roads open to vehicles through all areas means that all types of recreation will have access to more public land. Non-motorized can park and hike, ride horses, or mountain bike starting anywhere along the roads. We oppose limiting access, which would occur with "exclusive use zones"	See response to comment 413-9.
Gary	Clinard	934	11	Visitors who are not comfortable sharing the public lands with all types of recreation should be directed to areas which already prohibit motorized use. There are vast numbers of acers where solitude can be enjoyed without further restricting the recreation of a large percentage of visitors to the Moab area. We oppose creating more areas which allow exclusive use by one type of recreationalist.	See response to comment 122-9
Gary	Clinard	934	12	The trails and roads for motorized, and the non-motorized trails can be seperated in the same area so different types of users have minimal contact with eachother. The needs of all users can be accommodated without unduly restricting one (motorized) group. We oppose allowing public lands to become virtually exclusive domain of non-motorized users.	See response to comment 127-8
Gary	Clinard	934	13	Even if an area has a non-motorized focus, roads and trails for motorized should be allowed through all areas so that motorized recreationalists can continue on to enjoy other public lands. We oppose blocking any motorized routes.	See response to comment 127-8
Gary	Clinard	934	14	Dispersed campsites should not be closed unless a resource problem is fully documented and	Public participation has been solicited throughout the land use planning process. No areas are closed to

				reviewed by the open public planning process. The number of campsites which would be closed under each alternitave should be disclosed in the RMP. We oppose closing any dispersed campsites without public review.	camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsites closures depends upon site specific conditions.
Gary	Clinard	934	15	ATV use in the Moab area is increasing and this activity needs to be recognized. There will be a need for more ATV trails in the future and a way to provide this need must be addressed in this document. Some trails that are listed for motorcycles should be for both motorcycles and ATVs. We oppose any plan which ignores planning for the increased ATV use which is coming.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Gary	Clinard	934	16	We strongly oppose the inclusion of "Land with Wilderness Character" issues in this document. The designation of wilderness study areas was completed in 1991 and there is no plausible reason for reopening that issue in this RMP. The BLM would be in conflict with the direction that congress gave in section 603 of FLPMA, since there has been no statement by congress that the BLM should open this discussion again. Inclusion of "Lands with Wilderness Character" in this document will surly lead to lawsuits.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Gary	Clinard	934	17	It is important to keep as many motorized routes open as possible. It does not help to close routes, it only puts more pressure on the remaining ones. As roads become more crowded, more dusty from use, and provide fewer places to go, the satisfaction level of the motorized recreationalist	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring

				diminishes greatly. This dissatisfaction and the perception that motorized recreation is being traeted unfairly when compaired to non-motorized leads to management problems.	and site specific NEPA analysis.
Gary	Clinard	934	18	Close a road or trail only after all means of eliminating or reducing a problem have been exhausted. Work closely with local groups to identify and remedy damaging situations. Hold public meetings to explain problems and ask for help in resolving issues. Create education directed at illuminating a specific problem to those who may not know it is a problem. Rigorously enforce complience to regulations and laws, and fine those who do not cooperate.	See response to comment 122-18
Gary	Clinard	934	19	Use barriers or rerouters to protect resources.	Barriers and rerouters refer to means of implementation of the Travel Plan. The BLM will utilize all reasonable techniques to implement its Travel Plan
Gary	Clinard	934	20	Provide more open areas, where those who just want to play around with their vehicles can do so legally. This will help take that behavior off of the roads and trails.	The BLM Manual at 8342.1 identifies protection requirements for OHV designation. The following resources must be considered in the designation process; cultural, historical, archaeological, soil, water, air, scenery, vegetation, wildlife, wildlife habitat, threatened or endangered species, and wilderness suitability. The larger open area poses conflicts with many of these resources. An open area is proposed near the White Wash Sand dunes to provide recreation opportunities of this nature in the area best suited for this activity.
Gary	Clinard	934	21	Provide detailed information for OHVs about where they can go, what laws and regulations are in effect, what the BLM needs from OHVers to keep trails open, how to report problems, how bad behavior affects riding privileges, and how to respect other people who are using public lands.	See response to comment 122-18
Gary	Clinard	934	22	Educate non-motorized recreationalists about the legitimacy of motorized use on public lands.	See response to comment 123-25

Gary	Clinard	934	23	Provide positive interaction in the field between the BLM and motorized recreationalists. Give positive reinforcement and encouragement to users who are doing such things as staying on the trail, or driving/riding slowly past others on the road.	Positive interaction between BLM staff and recreationists is not a planning issue. The BLM recognizes the need for education, and its field staff endeavors to positively reinforce proper behaviors.
Tom	Messenger	935	1	The preferred alternative fails to provide adequate protection for lands of wilderness character. Too often, especially in the transportation plan, the allowed uses are seen as balancing the claims of different recreation communities while actually it's a question of maintaining the natural character of the land. The most glaring example is the inclusion of only 18% of land with wilderness character outside WSAs as AWCs.	The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-0550-1; BLM 1995). However, the BLM may manage the lands to protect and/or preserve some of all of those characteristics through the land use planning process. In addition, under the land use planning process, the BLM must consider a range of alternatives for the lands identified with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these Non-WSA lands. If all alternatives contained comparable protections of the Non-WSA lands with wilderness characteristics, the alternatives would have substantially similar consequences and would not be significantly distinguishable.
Tom	Messenger	935	2	The whole route from the mouth of Spring Canyon to the Hey Joe Mine should be closed to preserve the natural character of the _____ corridor and prevent conflict with recreation not at odds with that character. Additionally, the route extends degradation of actual qualities on the floor of Hey Joe Canyon well above the mine and turn-around by offering access to ATVs.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
John	Neff	936	1	"Special Recreation Management Areas" should stress accommodation of as much recreation as shows up, with the aim of mitigating impact, not diminishing user satisfaction. Expansion of active management in many areas, such as the Utah Rims, Yellowcat, Mill Canyon, Sevenmile Rim,	The BLM has proposed ten SRMAs in the preferred alternative. Mill Canyon, Sevenmile Rim, South Spanish Valley, Utah Rims, White Wash, Black Ridge, Rabbit Valley and Westwater are all within SRMAs (Mill Canyon, Sevenmile Rim and White Wash are within the Labyrinth Rims/Gemini Bridges SRMA, South Spanish

				South Spanish Valley, White Wash, Black Ridge, Rabbit Valley, and Westwater is appropriate and needed.	Valley and portions of Black Ridge are in the South Moab SRMA, Utah Rims and Rabbit Valley are in the Utah Rims SRMA, and Westwater is in the Two Rivers SRMA. The commentor should remember that recreation is but one of the multiple uses for which BLM manages its lands. See response to Comment 122-38 regarding Yellowcat. See response to comment 122-39 regarding Utah Rims See response to Comment 123-35 regarding the boundary of White Wash. See response to comment 122-43 regarding the Black Ridge area.
Marcia	De Sonne	937	1	The draft so-call Management Plan is a sham as no attempt is made to balance between preservation, recreation, and dubious energy development. It is skewed entirely to business special interests at the expence of the American public - vacationers, campers, hunters, birders and everyone else who may choose to just drive through this incredible land. And another special interest is the ORV business which hopes to profit from new open terrain. The BLM plan makes 80% of the area open to oil and gas leasing and opens 81% of the area for Off Road Vehicle (ORV) use.	The DRMP/EIS provides 4 alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping. The BLM acknowledges throughout the DRMP/EIS that Alternative B produces fewer adverse environmental impacts -- that is the expressed intention of that alternative. The BLM, however, is not required to choose the alternative which produces the least environmental impact, but must balance competing resources within its sustained yield, multiple use mandate.
Marcia	De Sonne	937	2	Fully protect all wild places around Moab such as Fisher Towers, Goldbar Rim, Labyrinth Canyon, and certainly the vast entire viewsheds of Arches and Canyonlands National Parks from oil and gas development and ORV use.	The management and level of protection of the wilderness characteristics on non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Any non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the management prescriptions established in the RMP. These Non-WSA lands have many resource values and use in addition to wilderness

					characteristics. The DRMP/DEIS considered all available information and a range of alternative prescriptions for how these values and uses would be managed. See response to comment 124-53.
Marcia	De Sonne	937	3	Adopt the needed protections by adhering to the Redrocks Herritage Plan put forth by the Southern Utah Wilderness Alliance as a balanced alternitave to the present BLM suggestion. The Redrocks Herritage Plan reconciles competing interests without precluding any. It would protect fragile wilderness lands and other sensitive areas from oil/gas leasing and development, and from excessive Off Road Vehicle use. It offers a reasonable transportation plan that lessens the impact of ORVs on the land while providing opportunities for primitive and non-motorized recreation.	See response to comment 124-9.
Michael	Deschamps	938	1	I would like to see Muddy Creek be re-opened to complete the loop to Factory Butte.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Penny	Schiller	939	1	First, I'd like to mention the Areas of Critical Environmental Concern (ACECs). There is an incredibly huge difference between Alt. B and C with regards to ACECs. Fourteen of them are brought forward in B, encompassing 613,000 acres. Alt. C only brings forward 5 ACECs with _3,000 acres. There is no balance in Alt. C. It does not adequately preserve critical areas. It does not recognize the need for maintaining diverse and wild lands for their senic beauty, solitude, and the preservation of species. I am particularly	See response to comment 124-68, 124-69, and 124-5 regarding ACEC designations

				concerned about the vulnerability of the Book Cliffs region, with it's abundance of natural beauty and cultural/ wildlife resources. The 5 ACEC's proposed in Alt. C are completely inadequate and unacceptable.	
Penny	Schiller	939	2	Second, I'm concerned about the non-WSA lands with Wilderness Characteristics. It scares me to read that Alt. C abandons all but three of these areas and protects a paltry 48,000 acres out of the potential 266,000 acres. I find that incredibly disturbing. How can you possibly consider that to be balanced? It's a giveaway. It's immoral. It worries me to think about what other 'uses' in our irreplaceably beautiful lands may have to endure. They must be protected. Do not allow the despolaition of the few undisturbed places we have left.	See response to comment 124-53.
Dan	Davis	940	1	SUWA's arguments are invalid. They are unhappy with the noises put off by off-road vehicles. How can you look at closing lands and not enforce muffler restrictions?	See response to 122-7.
Veronica	Egan	941	1	First, I wish to state my dismay that Utah State BLM Director Selma Sierra has refused to extend the comment period for any of the RMPs. This is hardly a way to foster public participation in the planning process!	See response to comment 124-1
Veronica	Egan	941	2	Under the BLM proposed plan, wilderness landscapes will, in large part, become sacrifice zones for off-road vehicles.	The BLM worked with an interdisciplinary team of resource specialists, which included representatives from Grand and San Juan Counties to develop the alternatives for the Travel Plan in the DRMP/DEIS. The ID team reviewed each route for purpose and need weighed against resource conflicts. These conflicts are identified route by route in the GIS data developed for the Travel Plan which is available in the administrative record. The impacts identified for travel management in the DRMP/DEIS are derived from this data.

Veronica	Egan	941	3	BLM proposes to designate 2,642 miles of ORV routes, many on lands within America's Red Rock Wilderness Act, including many which the BLM previously recognized as wilderness-quality. Damage from ORV use will be widespread. And peace and quiet will be extremely difficult to find: BLM's proposal will result in 84% of public lands near Moab (those south of I-70 which attract most of the areas visitors) being within 1/2mile of a designated ORV route. Where are we non-motorized folks to go to escape these machines?	See response to comment 124-53. The Moab Field Office manages over 350,000 acres as Wilderness Study Areas, in which only primitive recreation is allowed. In addition, the DRMP/EIS designates lands as non-motorized (hiking) focus areas. Non-motorized recreation is to be emphasized in these areas.
Veronica	Egan	941	4	At the same time, BLM has done no site-specific studies to determine the impact of these routes on Native American Cultural sites or other natural resources like riparian areas and wildlife habitat. Science to back up the ORV route designations does not exist in this document. These resources belong to all Americans, and deserve far more scrutiny before being permanently impacted by energy development and motorized traffic.	The impacts of travel on natural resources are analyzed in Chapter 4 of the DRMP/DEIS, including the No Action alternative. Additional information on the impacts of travel on resources has been added to Chapter 4 of the DRMP/EIS and to Appendix G (Travel). Land use planning is a tiered process ranging from broad general allocations and management prescriptions to subsequent site-specific authorizations. DRMP/EIS. Land use planning decisions do not require site specific analyses. Detailed impact analysis will be conducted for site-specific authorizations during implementation of the decisions in the RMP.
Burke	Johnstun	942	1	I'd like to address a few concerns I have with the alternatives currently on the table. First, I believe that none of the 4 alternatives are adequate to meet the needs of most visitors to Moab and further reasonable alternatives proposed by interested parties such as Ride With Respect are required to be studied prior to issuing a decision. At least, a supplemental study of these alternatives should be conducted.	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.
Burke	Johnstun	942	2	In regards to the inventory done by the Moab BLM, I believe that there are many motorcycle, mountain bike, and ATV trails that were not included. I would strongly suggest that these need to be inventoried prior to forming a final plan. The current inventory	See response to comment 122-14

				is deeply flawed and omits some very important trails.	
Burke	Johnstun	942	3	I believe the plan is to disallow any camping that is not a developed campsite is neither adequate or appropriate to meet the needs of the visitors to this area. Many visitors to Moab enjoy dispersed camping, and we enjoy being able to get some space from our fellow man. Also, designating campsites should be done with public participation.	See responses to comments 123-8. Dispersed camping is allowed on over 95% of the Moab planning area. See response to comment 120-86 regarding access to dispersed campsites. Public participation has been solicited throughout the land use planning process.
John	Davidson Jr.	943	1	In my experience on these trails, the individual user groups maintain a courteous and respectful co-existence. It seems to me that the conflicts are not with the individual users, but with some of the more extreme organizations that claim to represent the users. I strongly discourage the 'exclusive use zones' proposed for existing trails. This will be difficult to manage especially for less frequent visitors to the area and cause confusion when focus areas are overlapped or contain multi-use trails.	See response to comment 413-9.
John	Davidson Jr.	943	2	I note that there is a camping policy proposed in Appendix E. I am concerned with closing a high number of vehicle accessible campsites. This puts a financial bind on many who visit the area.	See response to comments 123-8 regarding dispersed and designated camping. There is no regional prohibition against vehicle based camping; although vehicle based camping is restricted to designated sites in heavily used areas around Moab (about 5% of the area), due to public health and sanitation concerns. See comment 120-86 regarding vehicular access to dispersed camping sites.
John	Davidson Jr.	943	3	Expanding the Sevenmile Rim area to include Mill Canyon and Tusher Rim would provide more than a single day of riding in this area.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Wendy	Hoff	944	1	The 2004 scoping period for drafting the RMP received 6,244 comments reflecting a pro-conservation position, and only 25 a pro-off-road-	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and

				vehicle position. Why do all of the draft alternatives include thousands of miles of off-road -vehicle use?	alternatives identified by the public. As a result, [four] alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Moab DRMP/DEIS provides in comparative form the management actions associated with each alternative.
Wendy	Hoff	944	2	Your alternatives slash Proposed Wilderness Areas. The BLM is the one that actually concluded these places have wilderness character. How could they completely reverse their position? There should be NO motorized access in these areas.	See response to comment 124-53.
Wendy	Hoff	944	3	Federal law requires the BLM to give PRIORITY to the protection of lands with senic, cultural, or ecological importance, which most of the Moab area qualifies for. The BLM needs to do site-specific studies to determine the impact of ORV routes on cultural and natural resources	Land use planning is a tiered process ranging from broad general allocations and management prescriptions to subsequent site-specific authorizations. Land use planning decisions do not require site specific analyses. Detailed impact analysis will be conducted for site-specific authorizations during implementation of the decisions in the RMP. See response to comment 124-68 regarding ACEC designations. In addition, all cultural resources are protected by the full force of the law.
Wendy	Hoff	944	4	as for oil and gas exploration, all of my above comments apply. Money-spending tourists are not here to see oil wells, trucks, and helicopters. Most comments received during the 2004 scoping period were not in favor of drilling. Exploration means, once again, lack of solitude for humans, and noise and roads that disrupt the soil, plants and animals, and cultural sites. Utah posseses such a meager percentage of the worlds energy reserves, why destroy our rural areas?	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public.

					An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. The DRMP/DEIS contains alternatives which strike an appropriate balance between environmental protection and development of the mineral resources on our public lands consistent with the requirements of the Mining and Mineral law and FLPMA. The PRMP/FEIS will offer BLM management the flexibility to protect resource values and uses while allowing for acceptable levels of mineral development. The Moab Field Office interdisciplinary team carefully considered the recreation resources of the Moab planning area in applying oil and gas lease stipulations in Alt C. Important scenic and recreation areas are managed as closed to leasing, or as open to leasing with

					a no surface occupancy stipulation. These areas include the lands along the Colorado, Green and Dolores Rivers, the areas around Fisher Towers and Mary Jane Canyon, and in areas along Highway 313. In addition, a controlled surface use stipulation to protect visual resources has been applied to other important recreation areas. All cultural sites are protected by law. The BLM worked with the Utah Division of Wildlife Resources, as well as the U.S. Fish and Wildlife Service, to provide protective stipulations for wildlife. Timing limitation stipulations have been applied to lands with sensitive soils in Alt C.
Wendy	Hoff	944	5	Grazing is ill suited to our lands, Cattle tear up the plants and soils almost as musch as vehicles. Appreciating wilderness… does not include cresting a hilll only to see..a herd of cattle.	Decisions concerning timing and season of use are made on an allotment basis using the Standards for Rangeland Health and Guidelines for Grazing Management. See Response to Comment 9-3.
Maggie	Wilson	955	3	In addition to the county roads inventoried by the BLM, SEVERAL HUNDRED MILES OF TRAIL EXISTS THAT WERE NOT INCLUDED IN THE BLM'S INVENTORY. Grand County's Trail Mix Master Plan highlighted many popular bicycle trails, some of which are not included in the BLM's inventory. I believe this is a violation of the 2001 BLM National Management Strategy for motorized OHV use that states "Successful resource management depends on gathering quality data using the best science available" (page 15) and the 2006 BLM technical reference on Planning and Conducting Route Inventories which states "Route inventories are an integral part of Land Use Plans (LUPs)/ Resource Management Plans (RMPs)" (page 5). The Moab RMP should acknowledge that the impacts to bicycling, motorcycling, and ATV riding cannot be fully measured in the absence of a complete trail inventory. PLEASE CONSIDER DESIGNATING TRAIL DATA THAT	See response to comment 122-14

				WAS PROVIDED DURING THE PLANNING PROCESS.	
Maggie	Wilson	955	4	Once the travel plan is implemented, the BLM should practice adaptive management by testing mitigation techniques such as visitor education, sinage, trail maintenance, and/or rerouting before prohibiting access.	See response to comment 123-25
Maggie	Wilson	955	5	The BLM should prioritize the development of new specific bicycle, motorcycle, and ATV trails, with preference to special recreation management areas (SRMAS), and especially to the appropriate focus areas. Trail expansion should avoid pitting recreationalists against one another on a rigid system of roads. To proactively manage recreation, SMRAs should be designated in anticipation of increasing visitation, not in reaction to it. SRMA boundaries and focus areas should be large enough to "grow into" as trends emerge. Focus areas should provide for a wide range of specialized sports.	See response to comment 413-9 regarding focus areas. BLM lands are managed for multiple use under FLPMA; mechanized recreation is but one of these uses. The BLM has placed 10 SRMAs in the preferred alternative. These SRMAs are designed to meet the future needs of recreationists. See also response to comment 122-14.
Maggie	Wilson	955	6	Likewise, trails should not be ruled out simply by virtue of their low use levels. Low-use trails represent an opportunity for Grand County to be prepared for times of high volume visitation by particular user groups when recreationalists seek out less popular routes. Some trails only appear to experience low use because they are durable, or have not been abused. LOW-USE TRAILS OFTEN PROVIDE A UNIQUE EXPERIENCE FOR RECREATIONISTS SEEKING SOLITUDE.	Assuming the commentor is referring to motorized routes for non full-size vehicles, no such route was ruled to be not identified for motorized use on the basis of low usage. Any such route not identified for motorized use in one or more action alternatives was a result of resource conflicts outweighing purpose and need. In the case of full-size vehicle routes, the process of route designation is outlined in Appendix G. The DRMP/EIS also provides a mechanism for future motorized routes to be added to the travel plan on a site-specific basis.
Maggie	Wilson	955	7	The Moab Extensive Recreation Management Area (ERMA) should provide primitive roads, singletrack trails, and dry washes to connect SRMAs and towns. Such routes offer opportunities for long-distance tours, which are increasing in popularity among motorized and mechanized enthusiasts, and promise to boost rural economies	See response to comment 122-49 and 123-45 regarding the ERMA. The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).

				and disperse use, thereby alleviating conflicts.	
Maggie	Wilson	955	8	The road plan in alternitave C provides sufficient road-based opportunities. More of the existing roads surrounding Interstate 70 should be designated for long-diastance touring. Compared to the road plan, motorized and mechanized trail designations are scarce. So the FINAL RMP SHOULD DESIGNATE TRAILS IN ALTERNATIVE D, PLUS OTHERS SUBMITTED BY RECREATIONISTS DURING THIS ENTIRE PLANNING PROCESS. The travel plan in Alertnative C does little to expand non-motorized oppertunities. Several areas could provide substancial primitive oppertunities by closing a few less-valuable roads. Homogeneity of the road plan would intensify conflicts and hurt all user groups in the long term. Alternatively, a few steps to diversify the travel plan could benefit recreationists across the activity spectrum.	See response to comment 124-55.
Maggie	Wilson	955	9	The ERMA, Thompson Trail is unique by virtue of its sheer length and remotness. Trail adoption by volunteers could preserve its singletrack character. Together with Thompson Wash and Copper Ridge Motorcycle Loop, Thompson Trail creates a unique route from the Sovereign Trail to Colorado. The Green River Gap and Browns Wash tie Colorado to the town of Green River. These singletracks should be preserved, along with dajacent double-tracks. Together such remote, rugged routes offer a chance to experience the desert like neither SRMAs nor graded roads can do.	See response to comment 122-29
Maggie	Wilson	955	10	Likewise, the Kokopelli Trail could be enhanced to create higher quality opportunities for motorized and non-motorized travel. The RMP should pledge to CONSTRUCT A KOKOPELLI SINGLETRACK AND MARK A KOKOPELLI DOUBLETRACK that would roughly parallel one another. Through Utah	See response to comment 122-46

				Rims, the singletrack should be open to motorcycles. Through Yellowjacket, the singletrack should actually be ATV trail. Everywhere else, the singletrack should be non-motorized. The doubletrack would generally follow the current trail, with revisions to achieve a rugged, backcountry opportunity.	
Maggie	Wilson	955	11	Northeast of Green River, the NON-WSA LANDS SURROUNDING TUSHER CANYON HAVE GREAT POTENTIAL FOR MOUNTAIN BIKE TRAILS. This northwest corner of the Bookcliffs has access roads, rims with sweeping views including Desolation Canyon, and relatively good soil development. Similar to bicycle trails in Fruita, a Tusher Canyon system would boost the economy of Green River, and dedicate quality trails for mountain biking.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Maggie	Wilson	955	12	GENERALLY SUPPORT ESTABLISHMENT OF LABRYNTH RIMS SRMA IN ALTERNATIVE C; HOWEVER, MOTORIZED USERS MUST HAVE SUFFICIENT AREA TO RECREATE OR THEY ARE MORE LIKELY TO ROAM, EXPOLORE OR TRESPASS AREAS RESTRICTED TO THEIR USER GROUP. The Dee Pass Motorized Trail focus area should be expanded beyond Alternative __ eastward to the powerlines. The White Wash Sand Dunes OHV Open Area should be expanded by two square miles beyond Alternative D (northward to Ruby Ranch Road and southward toward Red Wash Road). Fee programs should be determined with public involvement through a Resource Advisory Council. Approximately twenty-five miles of the surrounding OHV trails are popular among ATV riders, and should be designated as such. The Dead Cow Loop could be designated with the exception of the "low-water" alternate, to reduce riparian impacts. The Tenmile	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

				Point area from Dripping Spring to Levi Well has relatively few routes and could be designated for non-mechanized focus. Tenmile Wash should be designated without speed limits, since speed has little influence on the biophysical impacts of travel.	
Maggie	Wilson	955	13	THE SOUTHWEST CORNER OF LABYRINTH RIMS IS A RELATIVELY PRIMITIVE AREA, AND SHOULD BE MANAGED TO PRESERVE THIS QUALITY. Spring Canyon, Hellroaring Canyon, Spring Canyon Point, and South Horse Thief Point are best allocated as a non-mechanized focus. Motorized use there can be adequately accommodated by the Jeep Safari routes, focus a few choice spurs to overlooks. Closing the river road downstream from Spring Canyon would reduce recreation conflicts, while retaining access to Hay Joe Mine. Dubinky Wash is valuable for all vehicle use, and the singletrack near Jug Rock should remain available for motorcycles.	See response to comment 122-46
Maggie	Wilson	955	14	NORTH OF HIGHWAY 313, THE SINGLETRACK WHICH DROPS OFF HIDDEN CANYON RIMS IS A KEY LINK FOR MOTORCYCLISTS AND BICYCLISTS, ALIKE. The Mill Canyon- Sevenmile Rim mountain bike area ahould be rotated to become Mill Canyon- Tusher Rims. Tusher has better bicycling potential than Sevenmile due to less sand, more slickrock, and fewer roads. Then Sevenmile- Upper Courthouse motorized backcountry touring area could be created to recognize the high-value roads that extend through Monitor & Merrimac to Big Mesa campground. Upper Sevenmile Equestrian Area should be expanded by four square-miles to include some terrain above the rim.	See response to comment 122-46
Maggie	Wilson	955	15	SOUTH OF HIGHWAY 313, AN ADDITIONAL BICYCLE FOCUS AREA WEST OF SOUTH FOR SEVENMILE CANYON COULD PROVIDE	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel

				CROSS-COUNTRY AND VEHICLE-ASSISTED RIDES FROM THE UPPER GEMINI TRAILHEAD DOWN TO THE WITCHBACKS ON HIGHWAY 313. the Gemini Bridges motorized backcountry touring area could be shifted to include all of Little Canyon Rim. The spur to Gemini Bridges should remain open to allow the unique experience of driving to the bridge. MOUNTAIN BIKE ALTERNATES TO THE ROADS COULD BE DEVELOPED IN THIS AREA, AS PROPOSED BY TRAIL MIX. The Goldbar hiking area could be expanded further up Day Canyon, while only closing one spur road.	routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Maggie	Wilson	955	16	The Klondike Mountain Bike Focus Area is a great foundation to develop mechanized singletrack. Most spur roads could be closed east of Bar M and Sovereign Trail areas. Still, the Sovereign ATV Loop should remain permitted in its current location. Spur roads should also be closed north of the Copper Ridge Sauropod Trackway. THE COPPER RIDGE MOTORCYCLE LOOP IS HIGHLY VALUABLE TO MOTORCYCLISTS AND MOUNTAIN BIKERS ALIKE BECAUSE OF THE POINT-TO-POINT APPEAL THAT SINGLETRACK USERS COVET IN OUR AREA. Trail adoption could help to ensure enjoyment for mountain bikers, like the Sovereign Trail. And like the Sovereign ATV Loop, the Copper Ridge Motorcycle Loop could actually protect any non-mechanized trails that it surrounds by steering motorcyclists toward legal alternative.	See response to comment 122-46
Maggie	Wilson	955	17	Yellow Cat, Yellow Jacket, and Dome Plateau are worthy of SRMA designation. Yellow Cat and Yellow Jacket are densely roaded and increasingly popular among four-wheeled visitors, so they should have a motorized backcountry touring focus. Few adjustments are needed to the travel	See response to Comment 122-38

				plan, except around Owl Canyon where road access should be preserved. A non-mechanized focus area should buffer the entire boundary of Arches National Park, wrap around Dome Plateau, and terminate near Dewey Bridge. Only a couple of overlooks of Lost Spring Canyon and Dome Plateau are needed, but thety should remain open all the way to the rim.	
Maggie	Wilson	955	18	Utah Rims SRMA ought to extend further southwest to Cisco Road. From the Cisco Road to Cottonwood Wash, a mountain bike focus could lay the ground work for bicycle trails. From Cottonwood Wash to the Westwater Road, a motorcycle focus would help reserve Guy's Trail and associated singletracks. From Westwater road to the state line, several existing singletracks should be recognized in the travel plan, plus one ATV loop in the northeast corner of hay flat. a non-mechanized focus area could be expanded from the Westwater WSA further southwest all the water to private property. The entire spur road to Big Hole could be closed to enhance primitive characteristics. None the less, the Westwater Canyon overlook road should not be closed. Mechanized visitors should be granted at least one viewpoint of the place that their activities are prohibited from.	See response to comment 122-39.
Maggie	Wilson	955	19	The Dolores Triangle includes a few remote areas where primitive character should be preserved. By closing the less-valuable tours, Big Triangle substantially expands the Westwater roadless area to the north. Further south toward Buckhorn Draw, a few roads could be added to ensure that quality motorized opportunities exist in the Dolores Triangle as well. From Steamboat Mesa to South Bever Mesa, another focus area should be designated for primitive recreation. Half of the	See response to comment 122-40 regarding routes in the Dolores Triangle.

				Dolores River overlooks could be reserved as cherry stems. Also, a road on the southeast ridge of South Bever Mesa lies outside of this focus area, and should remain open.	
Maggie	Wilson	955	20	The Sand Flats Road traditionally connected trails such as Hells Revenge, Slickrock, and Fins 'N Things. Paving the road, and prohibiting OHVs from pavement, has fragmented the trail system. Thus OHVs should remain permited to use Sand Flats Road from Hells Revenge exit to the end of the pavement. The new, reduced speed limit of 25mph should be preserved. A NON-MOTORIZED LANE SHOULD BE CONSTRUCTED TO PARALLEL THE ROAD TO INCREASE SAFTY AND REDUCE CONGESTION. ADDITIONALLY, THE 1/4-MILE SLICKROCK ROUTE CONNECTING SLICKROCK TRAIL WITH FINS 'N THINGS SHOULD BE DESIGNATED FOR TWO-WHEELED USE TO ALLEVIATE TRAFFIC ALONG THE MAIN ROAD. All of these measures would make it and Flats more user-friendly and manageable, without further impacts to the environment.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Maggie	Wilson	955	21	PE__AL POLICIES SHOULD CONTINUE PERMITTING SLICKROCK EXPLORATION. The Moab Field Office Off-Highway Vehicle Travel Map states that "Two-wheel motorcycles are allowed on established slickrock riding areas in the Slickrock trail, Bartlett Wash and Tusher Canyon areas and on slickrock areas along the Monitor and Merrimac and Lower Monitor and Merrimac trails where such use does not further disturb vegetation or soils" (dated March 8, 2001 as part of emergency restrictions). In these areas, travel should be further restricted, but not so drastically as the DRMP intends. MECHANIZED TRAVEL SHOULD STILL BE ALLOWED ON ANY BARREN ROCK	See response to comment 122-42

				SURFACE. Slickrock within 100yds of a designated route could remain open to motorized travel, except for Tusher Slickrock, which would be reserved for non-motorized use. This two-hundred yard corridor would accomidate the ways that people currently enjoy slickrock areas.	
Maggie	Wilson	955	22	The Black Ridge area presents many potential recreation opportunities nearby Moab. The South Spanish Valley Mountain bike area could be extended to include part of Pole Canyon. This augments a varrity of terrain, and provides enough room for a full day's ride. Sweeping travel restrictions associated with the DRMP warrant designating an area for specialized sports which depend on unrestricted areas. Durable and irregular terrain that is suitable for motorcycle and bicycle trails riding exists in Pole Canyon from the powerlines area to Area BFE. In the same vein, a rock crawling area could be established on Black Ridge east of the powerlines. This area is littered with old mine roads, and is currently open to cross-country travel. The site could be limited to designated rock crawling routes, and adopted by local clubs. West of the powerline, the north flank of Black Ridge could be designated for equestrian use, as the backdrop to a residential area. THE SOUTH FLANK COULD BE A BICYCLE FREERIDE AREA, SINCE IT PROVIDES ONE THOUSAND FEET OF VERTICAL RELIEF, AND GRADED ROADS FOR SHUTTLING. Kane Creek is a dry wash from Highway 191 up to the Black Ridge Road. It should be open for OHVs to create a loop with Behind-the-Rocks while avoiding the Highway.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Maggie	Wilson	955	23	Hatch Wash backpacking focus area could be expanded for better backpacking. Alternative C proposes to designate roughly 20 spur roads to	See response to comment 122-45 regarding additional routes.

				the rim of hatch wash. However, only five are necessary to view most stretches of the canyon.	
Maggie	Wilson	955	24	Cameo Cliffs SRMA should also be expanded for better OHV riding. The current boundary offers a meager half-day for the skilled rider. Extending the SRMA east to Big Indian Valley could still avoid mining activity. Shifting the boundary north to the Brown's Hole oasis could still skirt the nearby residential area.	When the Cameo Cliffs SRMA was created, the areas to the east were specifically excluded due to mining hazards. Although travel on routes outside the SRMA is available consistent with the Travel Plan, the designation of the area as an SRMA would encourage the public to this hazardous area.
Michael	Sennett	956	1	The BLM is allowing the use of helicopters to stake mining claims which destroy the silence we hikers regard as essential to our experience.	This is not an RMP comment. The BLM does not have authority over air space.
Michael	Sennett	956	2	There should be buffer zones around Arches, Island In The Sky, Fisher Towers and Labyrinth Canyon. I have hiked in Goldbar Canyon and it is no place for ORVs. I have floated through Labyrinth Canyon and its environs are no place for ORVs. The Fisher Towers should be off limits to machines.	See response to comment 980-1. The 'buffer zones" that have been established are considered sufficient to protect the resources in question. The commentor provides no data to indicate why wider zones are needed.
Michael	Sennett	956	3	The BLM should be keeping ORVs out of WSAs as well. The long term values of the canyon country are in its natural state- the spectacular scenery, solitude and serenity provide refuge from the misery of modern times.	The preferred alternative designates only 1.7 miles of route within over 350,000 acres of Wilderness Study Area.
Tyler	Kokjohn	957	1	I am writing to request that the Final RMP include a travel plan that will adequately protect the natural and cultural resources harbored within this BLM planning area. The transportation plan simple proposes far too many miles of vehicle routes in areas of rare and unique value. In the appended information regarding the travel plan (section 7.1, page G-11) is a reiteration that the BLMis required to follow a non-impairment standard with regard to the management of WSA tracts. The preferred alternative proposes managing roughly 20% of areas acknowledged as possessing wilderness characteras such and seems out of line with the	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified.

				expressed non-impairment mandate. In general, the transportation plan seems to present alternatives that in ways do not vary much. For example, the total open route milage varies between 2,144 for the most conservation-oriented alternative to 2,671 for the least. While there will be constraints on closing some routes, I urge the BLM to explore the possibility that for some regions the preferred transportation alternative may not fully protect existing resources.	The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, [four] alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Moab DRMP/DEIS provides in comparative form the management actions associated with each alternative.
Tyler	Kokjohn	957	2	Allowing too many OHV routes in tracts that the BLM has inventoried and acknowledged to possess wilderness characteristics could place at risk a rapidly vanishing national resource--roadless and primitive areas. In addition, such actions would undermine active congressional legislation to formally designate and permanently protect portions of BLM areas within the Red Rock Wilderness. Allowing OHV routes within areas of wilderness character will also put irreplaceable cultural resources at risk of distruction and looting. The clear mandate to the agency is to protect and preserve these resources for future generations.	See response to comment 124-53. See also response to comment 124-48 concerning cultural conflicts.
Tyler	Kokjohn	957	3	The Draft Plan proposes to undertake cultural resource inventory and assessments for areas subject to development. This is a great idea since so little inventory data is on hand to inform management decisions. Unfortunately, the preferred alternative includes only about 60% of the total acreage potentially in play for assessment. It is unclear why the most conservative-oriented alternative would propose more inventory and assessment be preformend in	The commentor is assumed to be referring to the spread, by alternatives, of cultural field inventory. A larger acreage is prioritized for cultural field inventory in the conservation alternative because the BLM is proposing a pro-active, conservation oriented alternative. Alternative D emphasizes commodity production. While the laws protecting cultural resources must be followed in implementing all actions, Alternative D is less concerned with a pro-active conservation approach. Cultural resource inventories will be undertaken in response to

				the face of markedly less potential development threat. The amount of cultural resources inventory and assessment must be commensurate with the threat and I urge the BLM to be certain the final plan will allow for such activities to be preformed at the scale necessary to ensure archaeological assets are safeguarded.	the development proposal. Thus, the prioritization of cultural field inventories fits the theme of each of the action alternatives.
Wayne	Mohler	958	1	The final EIS should disclose how many camp sites would be closed under each alternative. With self-contained campers or Toy Haulers, there are not the sanitation issues that might exist with tent campers. We self-contained campers would support a policy where existing camping sites are open, unless determined closure is deemed necessary through lawful, public planning process.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsite closures depends upon site specific conditions.
Wayne	Mohler	958	2	The White Wash area has many camping sites, which are used every week by different groups, which do not apprear on your maps. The Final RMP should mandate full public involvement for any establishment and management of "restricted camping areas" or "controlled camping areas"	See response to comment 120-83 concerning enlarging the White Wash area to accommodate dispersed camping. Public participation has been solicited throughout the land use planning process; however, the process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision
Wayne	Mohler	958	3	When addressing "User conflicts" the final RMP should not have "exclusive use zones". Any percieved or potential "oser conflict" could result in prohibiting one or more user groups, again causeing that excluded user group to be compressed into a smaller avaliable space, thus increasing the potential for higher impact.	See response to comment 413-9.
Wayne	Mohler	958	4	The Utah Rim SRMA is needed to properly manage this popular area. There should be two-track, single-track (motorized and mountain bikes)_focus, and feature the ability to designate or construct additional routes as they become	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). See response to comment 122-39 regarding the proposed boundary.

				needed in the future. Limiting camping to one small designated area in the RMP would be foolish. The RMP should provide general guidelines and not limit camping in such a way. The SRMA must utalize the dense network of mining road that already exist throughout the Moab area. The Utah Rims SRMA should extend further South and West to encompass Mel's Loop and beyond. Increased visits by our citizens currently warrant a more active management of the SMRA. A larger area could provide sufficient room for a full-day motorcycle rides and the creation of a new area for mountain bike focus.	
Wayne	Mohler	958	5	Since no single track inventory was preformed, the BLM should continue accepting data on existing single track routes and consider them for implementation. Saying that there is a lack of funds or resources to review these routes is not an acceptable reason for not providing access to this user group.	See response to comment 122-14
Wayne	Mohler	958	6	An open area, in addition to the White Wash area would provide addiotional and different terrain for everything from trails motorcycle riding to rock crawlers, with separate loops for hikers, bicycles and equestrian users. The Black Ridge could remain unrestricted for this purpose.	See response to comment 123-35
Steven	Davis	959	1	In the '70's, '80's and into the '90's, the WTA used to hold annual events in the rocks just above the Slickrock Trail parking lot, but a few years ago there was a push to close much of the rock area, and we were restricted from being able to use that area for our competitions. I would love to see the slick rock trail area expanded laterally to allowfor exploration and allow us room to navigate around the bicycle riders.	See response to comment 122-42
Steven	Davis	959	2	I understand that a proposal is in the works to create a dedicated "open" trails motorcycle/bicycle	The BLM Manual at 8342.1 identifies protection requirements for OHV designation. The following

				area at Pole Mountain near the BFE area. I whole heartedly applaud this effort, and hope that you will do everything possible to make it happen. Although we enjoy the opportunities in Moab of riding on designated roads and trails, we also need open areas where we can set our competition sections as the sport requires rugged terrain that can't be found on marked roads and trails. Please don't make the mistake of trying to lock us into a small area. As I am sure you are all well aware, OHV's are the fastest growing sport in the nation, and we need an area large enough that will accomidate those growing numbers.	resources must be considered in the designation process; cultural, historical, archaeological, soil, water, air, scenery, vegetation, wildlife, wildlife habitat, threatened or endangered species, and wilderness suitability. The larger open area poses conflicts with many of these resources. An open area is proposed near the White Wash Sand dunes to provide recreation opportunities of this nature in the area best suited for this activity.
Greg	Phillips	960	1	It seems that the BLM is proposing a "close first-mitigate last" approach to OHV use. I would suggest that the final RMP mandate that adaptive management practices be used across the Field Office and that the RMP should direct that mitigation efforts will be exhausted prior to closure. If a closure does take place another area equal in recreational opportunity should be opened elsewhere. This will prevent congestion and 'over use' of any particular area. This is important to maintain the environment and still allow recreation. When an area is closed it just doubles the demand on another area.	Mitigation can be put in place without an emergency limitation or closure.
Greg	Phillips	960	2	Recreationalists need a few distinct areas open for travel. In 1.8million acrea, White Wash is not quite enough. An open area in addition to White Wash could provide different terrain for everything from bicycle riding, to motorcycling, to hard core rock crawling. As much of the Moab area becomes limited to designated routes, open areas play an even more critical role for accommodating specialized sports. I hope the final RMP designates some additional open areas.	The BLM Manual at 8342.1 identifies protection requirements for OHV designation. The following resources must be considered in the designation process; cultural, historical, archaeological, soil, water, air, scenery, vegetation, wildlife, wildlife habitat, threatened or endangered species, and wilderness suitability. The larger open area poses conflicts with many of these resources. An open area is proposed near the White Wash Sand dunes to provide recreation opportunities of this nature in the area best suited for this activity.

Nate	Dallolio	961	1	Fee systems are very controversial and unpopular with the recreating public. The accepted version of the RMP should not include or require a fee system. Not only are these system not viewed well by the general public, but they are discriminatory against Americans with lower incomes. Individuals with considerable financial means barely notice the impact, while those with less struggle can't afford to use the land thay already should have option upon.	See response to comment 123-10.
Nate	Dallolio	961	2	It is acceptable to add recreation areas to what has been available in the past that include primary focus opportunities for recreating groups; it is unconstitutional to arrange the plan that excludes specific groups from the right to use public lands	See response to comment 413-9 regarding focus areas. Focus Areas are not intended to be for the exclusive use of any one group of recreationists.
Caroline	Petti	963	1	Labyrinth Canyon- the Green River flows through Labyrinth into Canyonlands National Park, a river segment that has long been enjoyed by the public on float trips. The area has valuable habitat for desert bighorn sheep and pronghorn antelope. It should be protected by barring ORVs and oil/gas leasing from the canyon and its rims and approaches, including Ten Mile Canyon, Ten Mile Point, White Wash, Hell Roaring Canyon, Mineral Point, Horsetheif Point, Deadman Point, and Springs Canyon Point. An "Area of Critical Environmental Concern" (ACEC) should be designated to protect this entire area.	Although Labyrinth Canyon is not proposed as an ACEC in Alt C, many management decisions protect the values brought up by the commentor. Desert bighorn sheep habitat and migration corridors are protected by the imposition of a no surface occupancy (NSO) stipulation for oil and gas leasing and all other surface disturbing activities. The Green River, Ten Mile Canyon, Hell Roaring Canyon, Mineral Canyon and Spring Canyon are managed with an NSO stipulation. Areas near the rim of the Green River (such as Deadman Point, Horsethief Point, Mineral Point and Spring Canyon Point) are also managed with a no surface occupancy stipulation for oil and gas leasing and all other surface disturbing activities. All motorized travel in the Labyrinth area is limited to designated routes. The Travel Plan for Alt C designates some, but not all, existing routes.
Caroline	Petti	963	2	White Wash Sand Dunes- ORVs have dominated this area for too long, jepordizing it ecological value as a dune comples with cottonwood trees and with bighorn sheep habitat close by. BLM is	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan

				right to close part of the dunes in Alternative C, but I urge you to close the entire complex. It is too valuable to be left to ORV activity, which keeps the rest of the public from enjoying the area.	based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Caroline	Petti	963	3	Colorado River Corridor- Fisher Towers and Mesa, Dome Plateau, the Dolores River and its tributaries should be part of protected ACEC barring ORVs and mineral leasing. Visitors to Moab are enjoying this area by float trips, horse riding, hiking, and siteseeing along Highway 128 on the way to Moab. It is also central in the panoramas people enjoy from popular viewpoints in Arches National Park. ORV traffic and oil/gas drilling would mar these grand views.	In the preferred alternative (Alt C), the Colorado River Corridor, including Highway 128, is managed as no surface occupancy or as closed for oil and gas leasing. Surface disturbing activities are prohibited in areas delineated as no surface occupancy (see Appendix C of the DRMP/EIS). In this alternative the area is designated as VRM II. Therefore, the BLM contends that the management actions proposed in Alt C are sufficient to protect visual resources and to prevent harm to wildlife and plant habitat along the Colorado River.
Stacy	Salmana	965	1	The final RMP should mandate that adaptive management practices be used across the Field Office. The final RMP should direct that mitigation efforts will be exhausted prior to closure. The Final Rmps should direct land managers to work with the affected public to ensure all available mitigation efforts have been exhausted before closure. When using adaptive management principles, the RMP should mandate the mitigation of closing routes and areas to recreational use by designating a more sustainable, but similar recreational opportunity elsewhere.	Adaptive management merely means using site specific factors to guide future decisions.
Stacy	Salmana	965	2	The Final RMP should avoid "exclusive use zones" where, based on percieved or potential "user conflict," one or more "conflicting uses" is categorically prohibited. Most of the non-motorizrd focus areas have designated routes open to motorized vehicles within them. If implemented as written in Alternatives B, C and D, many visitors will precieve these focus areas as establishing blanket restrictions on motorized use. The unintended concequences will likely result in increasing, not reducing actual or perceived "user	See response to comment 122-9

				conflict".	
Stacy	Salmana	965	3	The Final RMP should direct land managers to educate the non-motorized visitors (who may perceive conflict with motorized uses) where they may encounter vehicle traffic in certain areas as well as informing them of areas where they may avoid such encounters. The Final RMP should direct land managers to educate vehicle-assisted visitors of where road or trail might be shared with non-motorized visitors, and if appropriate, direct slower speeds. The Final RMP should direct land managers to re-route either use so as to avoid sections of roads or trails that are extremely popular with both groups.	See response to comment 122-9
Stan	McVey	966	1	We started out riding competitions around the Slick Rock Trail Head (near what I believe is called the Sand Flats Recreation area?) but were denied access to that area for confusing reasons. The Slick Rock "bike" trail, by the way, was designed for and by off-road motorcycle users. Its popularity as a mountain bike trail has overshadowed the use by OHVs, and I suppose I'm okay with that, but I ask that, in return, we are provided with trails-specific use area. The Nature of trails dictates that we have an open area with suitable terrain. This includes, but is not limited to, rocks, logs, mud, sand, dirt, and some more rocks. With the revision of the Moab Field Office RMP, this is an opportune time to consider a trails specific riding area and a dedicated rock crawling area for those who enjoy those forms of recreation. I fully support the proposal by Ride With Respect for additional mountain bike, trails, and rock crawling areas. For trails use, we don't require a large area as long as the terrain is suitable. One square mile would be more than	See response to comment 208-7, 122-42

				sufficient, contingent on the terrain. The area around Pole Mountain near Area BFE, as described by Ride With Respect, would likely be suitable location.	
Stan	McVey	966	2	The proposed White Wash open area is much too small. As 99% of the Moab Field Office becomes limited to designated routes, open areas play an even more critical role for accommodating specialized sports. Perhaps parts of Black Ridge could remain unrestricted for this purpose? The Moab DRMP would reduce the "open" portion of the Moab Field Office from 38% to 0.001%. That's outrageous. However, a mere additional 0.001% left open would greatly improve the options for certain specialized sports like rock crawling and bicycle/motorcycle trails. A reserved rock crawling area could be centered around the previously disturbed lands of the Yellow Circle Mine.	See response to comment 123-35
Stan	McVey	966	3	I ask you to seriously consider the needs of rock crawlers, trails/freestyle bicyclist, and motorcycle trails riders. Providing badly needed open areas for them will take much pressure off other restricted areas and give us a place to recreate where we won't bother those desiring a "wilderness experience".	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Wayne	Peters	967	1	I was amazed to learn that there was a prairie dog population off of I-70. This whole area should be protected, as praitie dogs should be on the Endangered Species list.	The commentor's desire for the BLM to protect the area around the known prairie dog population near Interstate-70 is noted.
Richard	Newcomb	968	1	Management objectives that use such things as primitive recreation zones, Areas of Critical Environmental Concern, and so-called "areas with wilderness character" to create de-facto Wilderness management is unlawful.	See response to comments 120-8, 121-10, 121-58, and 121-61.
Richard	Newcomb	968	2	All SRMAs with the motorized focus should include direction regarding when and how additional or expanded routes/areas would be provided should	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).

				there be a need.	
Richard	Newcomb	968	3	The Utah Rims SRMA is necessary to properly manage this popular area. It should have a motorized and mountain bike focus, and include the ability to designate or construct routes should they be needed in the future. The Utah Rims SRMA should extend further southwest to encompass Mel's Loop and beyond. Increased visitation there warrents the more active management of a SRMA. This larger area would also provide enough room for a full-day's motorcycle ride, and the establishment of a mountain bike focus area.	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). See also response to comment 120-30.
Richard	Newcomb	968	4	BLM should consider a SRMA in the Yellowcat area. Yellowcat is increasingly popular for four wheeling and ATV riding. Designating a SRMA there could utilize the dense network of mine roads that already exist.	See response to Comment 122-38
Richard	Newcomb	968	5	The Mill Canyon- Sevenmile Rim biking focus area should be expanded as Mill Canyon- Tusher Rims in order to provide better terrain for pedaling.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Richard	Newcomb	968	5	The Final Plan should extend the South Spanish Valley biking area further south toward Black Ridge.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Richard	Newcomb	968	6	An open area in addition to White Wash could provide different terrain for everything from bicycle free riding, to trails motorcycling, to hardcore rock	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel

				crawling. As 99% of the Moab Field Office becomes limited to designated routes, open areas play an even more critical role for accomidating specialized sports Perhaps part of Black Ridge could remain unrestricted for this purpose.	routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Richard	Newcomb	968	7	The Sand Flats Recreation Area could adopt special policies to permit slickrock exploration. We support Ride With Respect's recommendation that mountain bike travel be allowed on any barren rock surface. Slickrock within one hundred yards of a designated route could be open to motorized travel. This two-hundred yard corridor would accomidate the ways that people currently enjoy Sand Flats.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Richard	Newcomb	968	8	Since no singletrack inventory was preformed, the BLM should continue accepting data on existing routes to consider them for implementation.	See response to comment 122-14
Richard	Newcomb	968	9	The Utah Rims single-track network should include at least 25miles of additional routes, in order to be as complete as the Dee Pass network.	See response to comment 122-46
Richard	Newcomb	968	10	Long-distance single-tracks and rugged roads that connect SRMAs offer a unique experience. The Copper Ridge Motercycle Loop should be combined with Thompson Trail in the Final Plan.	See response to comment 122-29
Richard	Newcomb	968	11	A few more non-riparian washes should be left open, especially in the Cisco Desert. Wash riding is very popular. These travel-ways provide ATV and motorcycle riders an unconfined challenge that roads cannot.	See response to comment 122-14
Phil	Tisovec	971	1	Additionally was shocked at the comment in the Special Designations section that pinpointed specific damage to the [White Wash] area as "especially OHV users using the cottonwood trees as slalom poles". Maybe it's been observed, but that does not mean it is the norm. Biased, catch-all statements such as that really made me question the integrity of the document as a whole. The BLM	The BLM worked with an interdisciplinary team of resource specialists, which included representatives from Grand and San Juan Counties to develop the alternatives for the Travel Plan in the DRMP/DEIS. The ID team reviewed each route for purpose and need weighed against resource conflicts. These conflicts are identified route by route in the GIS data developed for the Travel Plan which is available in the administrative

				needs to be sure that there exists a factual justification for making any of the decisions and proposals existing in any of the plans.	record. The impacts identified for travel management in the DRMP/DEIS are derived from this data.
Phil	Tisovec	971	2	I am also concerned with how the proposal may be addressing closure of trails and areas for OHV use- basically closingbefore testing all alternatives. The Final RMP should mandate that adaptive management practices be used across the Field Office concerning closures. All mitigation efforts should be attempted before closure including working with the affected public to ensure all efforts have been exhausted. When possible, attempts should be made to balance closures with designations of new areas that are similar and more sustainable.	Adaptive management merely means using site specific factors to guide future decisions.
William	Allender	973	1	I am a Geographic Information Systems Professional (GISP) and have had the opportunity to closely review the GIS data used for the maps that were submitted as part of this Draft RMP-EIS. By zooming in on certain areas of the data, using ArcMap, it is clear that this plan is setting up user groups to be at odds with each other for many years to come. In particular, the designation of lines on the map as "motorized use" traveling through a polygon area listed as "non-motorized use" sets the stage for future court battles between groups like the Southern Utah Wilderness Alliance (SUWA), a varity of Off-Highway Vehicle (OHV) user groups, and the BLM. I am referring specifically to the designations shown in Alternative C, your preferred alternative, for locations such as Pritcherd Canyon, and the OHV corridors of Gold Bar, Rusty Nail, and Gold Spike. Rather than have a corridor or route "line" sit directly on top of a "polygonal" area, I would hope that the single polygonal area be split into multiple areas, to eliminate this "vagueness of use" and	See response to comment 127-8

				future conflict among user groups. Let's please try to get this right the first time and not have the user groups spend many years bickering over the definition of words and "intent", in court, if that's even in the realm of possibility.	
William	Allender	973	2	I am extreamly disappointed at the exclusion of the current Cisco Desert single-track, the trail connects the Colorado Border to Thompson Springs, UT, from the preferred alternative. Simply traveling down the only other alternative, a pothole-laden interstate frontage road, is a poor substitution for this wonderful trail system (shown in Alternative D) that has minimal impact on the area. I hope that you will reconsider and keep this trail open from the Colorado border to Thompson Springs, as the premier alternative for dual rport riders like me, for traveling cross-country and staying out of earshot of the interstate highway system.	See response to comment 122-46
Ed	Askew	974	1	Your own data shows that there has been an increase of hundreds of percent in the number of people recreating using ATV's and other ORV since the last time you did a travel plan, I find it hard to understand that with the increase and the trends showing that more people will be buying ATV's and needing a place to recreate that we are closing 2/3 of the trails.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Phil	Triolo	975	1	Suffcient time has not been allowed for comments. The plans took many years to prepare and are quite detailed. As the BLM is to manage these lands in public interest, more time should be allowed for the public to comment. Because of the limited time allowed for comment, it appears as if the intent is to remove public input on public lands, rather than solicit it.	See response to comment 124-1
Phil	Triolo	975	2	The preferred alternative, and indeed, none of the other alternatives, adequately protect wilderness	Wilderness Study Areas cannot be released by the land use planning process. The Moab DRMP/EIS states that

				study areas. These areas were selected and set aside for study because they exhibit wilderness characteristics. Trails have been illegally etched onto the landscape in these areas by OHVs. Illegal activities should not disqualify these lands from wilderness designation, and by proposing to drop them as wilderness study areas, the BLM is condoning illegal activity which it failed to adequately curtail.	if these lands are released by congress (at some point in the future), they will be subject to a plan amendment before actions can be authorized. The Moab BLM has over 350,000 acres of Wilderness Study Area. These areas are monitored monthly; their suitability for wilderness has not been impaired. As described in Chapter 1, pg. 1-11 of the DRMP/DEIS under the title “Issues Addressed Through Policy or Administrative Action,” WSAs are managed in accordance with the Interim Management Policy for Lands Under Wilderness Review (IMP, H-8550-1; BLM 1995). The WSAs are statutorily required, pursuant to FLPMA Section 603(c), to be managed to protect their suitability for Congressional designation. Applying a visual resource management objective of Class I and managing the WSA as either limited to designated ways or closed to OHVs are the only two decisions that this land use planning effort has authority to make. All other decisions for the management of WSAs are outside the scope of this RMP/EIS process.
Phil	Triolo	975	3	I have rafted and canoed Labyrinth and Stillwater Canyons several times, most recently on a family trip in 2005. The development proposed for theses canyons-particularly the designated trails and proposed oil development- are not at all consistant with the reason that I have floated there. This is one of the few stretches of river in Utah that is easily accessible, is not difficult (class II) and thus allows trips with young children, and is not permitted. This stretch is a perfect introduction to calm, scenic whitewater. It would be irreparably damaged by the establishment of permanent trails and oil development in the area. I suggest that the area be designated as off limits to OHV and oil development, and proposed for Wild and Senic designation.	See response to comment 124-88.

Phil	Triolo	975	4	It is my understanding that over 80% of the 1.8 million acres covered by the plan will be within 1/2 mile of an OHV trail. Too much wildlife habitat and wildlife are disturbed by such a pattern of trail. We need to protect ecosystems. An understanding of the need for biological integrity of the areas studied is lacking. Concentrate all of the vehicular use in one area. Let the rest of the land- huge expanses that allow for continuous habitat for local fauna and minimize the introduction of exotic species-remain off-limits to OHV use.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Amy	Brunvand	976	1	BLM should extend the comment period in proportion to the task of trying to evaluate thousands of pages of data and maps in a few months.	See response to comment 124-1
Amy	Brunvand	976	2	The plan is so heavily slanted towards commodities development and motorized recreation that it completely fails to meet the goal of balance. When I do a thought experiment and imagine what the Moab area is going to look like once Alternative C is "built out" I see a landscape that is no longer "natural" in any real sense, but largely devoted to motorized recreation, with roads built through areas that used to have natural character. Alternative C does far too little to protect the natural character of the land in the face of population growth and potential commodities development boom, and wrongly assumes that a compromise should be made by sacrificing areas that currently have wilderness characteristics.	See response to comment 124-9
Amy	Brunvand	976	3	"Map 2-24-C Areas with Wilderness Characteristics Alternative C" is even more shocking since the BLM preferred Alternative C proposes eliminating conservation management for nearly all the areas that are identified as having Wilderness Characteristics in Map 2-24-B. Page 2-5 suggests that it is somehow a reasonable	See response to comment 124-53. As described in Chapter 1, pg. 1-11 of the DRMP/DEIS under the title “Issues Addressed Through Policy or Administrative Action,” WSAs are managed in accordance with the Interim Management Policy for Lands Under Wilderness Review (IMP, H-8550-1; BLM

				"balance" to slash 33 non- WSA areas with wilderness characteristics (266, 485 acres) to 3 (47, 761). True balance would mean protecting every single one of those 266, 485 natural acres. Given how much of the Moab area is already roaded, or susceptible to commodity development and how little of the Moab area is still "natural" and considering how central the area has become as a destination for adventure tourism it is clearly urgent to maximize protection for WSAs, areas with wilderness characteristics, areas that qualify as Wild and Scenic Rivers, and all river corridors and riparian areas while there is still something to save.	1995). The WSAs are statutorily required, pursuant to FLPMA Section 603(c), to be managed to protect their suitability for Congressional designation. Applying a visual resource management objective of Class I and managing the WSA as either limited to designated ways or closed to OHVs are the only two decisions that this land use planning effort has authority to make. All other decisions for the management of WSAs are outside the scope of this RMP/EIS process. In addition, the preferred alternative of the DRMP/EIS proposed that the Green, Dolores and Colorado Rivers be managed as Wild and Scenic Rivers. These river corridors are to be managed as no surface occupancy for oil and gas leasing and all other surface disturbing activities.
Amy	Brunvand	976	4	The plan needs a better balance between conservation and mining impacts A report from the Environmental Working Group U.S. Mining Database. Http://www.ewg.org/sites/mining_google/US/analysis.php says that between January 2003 to July 2007, 864 mining claims were staked on BLM lands within 5 miles of Arches National Park, and 233 new claims were staked on BLM lands within 5 miles of Canyonlands National Park. At the October 3rd public meeting at the Salt Lake Public Library a BLM representative said that because BLM has no control over legitimate mining claims the potential impacts of this boom in mining claims didn't need to be considiered in trying to create balance. While it may be true that BLM has no control to prevent legitimate mining claims it is also clear that these mining claims are essentially a time-bomb that may (or may not) explode into a mining boom at any time bringing with it a population boom, road construction, surface	The location of mining claims does not correlate with production and development. Many mining claims are located for speculation purposes and no development occurs. The development that BLM projects for locatable minerals in the Moab planning area is provided in the Mineral Potential Report and is summarized in Chapters 3 and 4 of the DRMP/EIS. Unless withdrawn, BLM lands are available for mining claim location. Iin Appendix C, on pg. C-1 and C-2, it states: “where necessary in the future, areas identified as no surface occupancy could be recommended for withdrawal from operations conducted under the mining laws if unacceptable resource impacts are occurring.” The preferred alternative in the DRMP/EIS proposes to continue the Three Rivers Withdrawal (see Map 2-1).

				disturbances, and increased motorized travel in the backcountry. It is clear that the minimal protections which Alternative C offers to existing natural areas would become entirely inadequate if a mining boom actually does develop to the current potential.	
Amy	Brunvand	976	5	The plan needs a better balance between conservation and motorized recreation impacts. In every alternative, the maps show a spider web of redundant motor vehicle routes, particularly in the area East of the Colorado River. Many of these routes travel through areas identified by the Utah Wilderness Coalition as having wilderness values, which means that these particular areas are the ones that many citizens consider especially important to manage for natural character and potential for primitive and unconfined recreation. Motorized recreation in these areas is a completely incompatible use. At the October 3rd Public meeting at the Salt Lake Public Library, a BLM representative said that the density of vehicle routes in this area is "not a problem, because when I go out there I almost never see another vehicle." It is true that low population has helped protect public lands in the Moab area in the past, but low population is a bad assumption for future management. A report in the Deseret News (11/16/2007) says that in the past year the state grew by 84,425 people, adding 10 people per mile. That makes it especially poor management strategy to assume that Off-Road Vehicle use will continue to be low. If the BLM representative was accurate in saying that very few vehicles travel on these roads, it is clearly unnecessary and undesirable to leave so many different routes to the same places.	As described in detail in Appendix G, the BLM assessed several thousand miles of inventoried motorized routes, assessing each on for purpose and need balanced against resource conflicts. As a result of its deliberations, over 2500 miles of currently available motorized routes were identified for non-motorized use. In addition, the BLM reduced the acreage available for open cross-country travel to zero (or near-zero) in all action alternatives. The commentor provides no specifics as to which particular routes are redundant.
Amy	Brunvand	976	6	Wherever Off-Road Vehicle use is allowed it has	The routes identified as “D” routes in the DRMP/DEIS

				the potential to expand the maximum allowed level, so it seems worse than foolish to write a travel plan that specifically assumes a particular Class D road will never become a popular off-road recreation route.	are roads located on public lands and managed by the BLM until properly adjudicated. The DRMP/DEIS proposes four different alternatives to manage these routes.
Amy	Brunvand	976	7	The sheer number of roads on the map looks like it would be impossible for the BLM to adequately monitor off-road vehicle impacts such as unauthorized trail-building.	See response to comment 122-18
Amy	Brunvand	976	8	At the public meeting the BLM representative stated that the redundant routes are necessary because "nearly all of them access a view". This excuse seems absolutely unjustifiable since pretty much the entire Moab area constitutes a "view" and clearly non-motorized users would also like to see views without the smoke, exhaust, noise, and landscape scars caused by motorized recreation.	See response to comment 120-87
Amy	Brunvand	976	9	The information on the OHV use and user conflicts on pages 3-82 through 3-88 pretty clearly shows why merely expanding the areas subject to OHV recreation pressure is an exceptionally poor management strategy to cope with growing numbers of OHVs. BLM already knows that OHV management is a huge headache and that OHV use conflicts not only with non-motorized recreation but with other land uses such as oil and gas and ranching. When OHVs start using an area, even in realitively small numbers, the concept of multiple use goes out the window because intentionally or not a fairly low level of motorized recreation use still bullies all other uses out of the way for various reasons. The example given in the Draft RMP (p. 3-85) of Gemini Bridges is exactly right. 10 years ago that was an area where I enjoyed bicycling, but nowadays the number of OHVs has made riding in the area too unpleasent for anyone else to enjoy the area.	See response to comment 122-9

				Essentially any area that is open to unrestricted OHV use is being managed to potentially become and area that is ONLY for OHV use. The RMP is the only chance to develop stratigies that will make the problem truly manageable. That means OHV recreation should be limited to marked roads and trails. Areas should be closed to OHV travel unless they are clearly marked as open. OHVs should be excluded from all areas that area currently identified as having wilderness characteristics. Redundant routes should be trimmed from the map. Recreational OHVs should be kept away from all river corridors and riparian areas.	
Jen	Allender	977	1	User fees- The group that decides how the funding should be spent is not spelled out. I do not want to risk paying a fee that might be used to limit access to public lands. The affected user groups, the Recreational Fee Advisory Council, and the BLM Resource Advisory Council absolutely need to be the main contributers to such funding decisions and this fact needs to be spelled out.	See response to comment 123-10 regarding the possibility of a fee system for use of the open area in White Wash Sand Dunes and the Federal Lands Recreation Enhancement Act. The fees collected in the Moab Field Office are used for operations of this type, in accordance with FLREA.
Jen	Allender	977	2	I disagree with constructing fences or anyother structure on migrating sand dunes. I say this with emphasis as a Geologist. The whole point of migrating sand dunes is that they MIGRATE and whatever plants take hold or not have to adapt to the CHANGING conditions. The fence idea appears to be an attempt to stabilize migrating sand dunes for no logical purpose.	See response to comments 208-3 and 479-6.
Jen	Allender	977	3	I strongly support the inclusion of the Cisco Desert single-track because it is miles and miles of enjoyment. I thoroughly enjoy riding the tight little sandy washes and winding sandy hills. I find the views of the Bookcliffs and La Sals from the Cisco Desert trail to be starkly beautiful and I would hate to loose such a perspective. Because the Cisco Desert single-track is a long trail not located near	See response to comment 122-46

				anything else, it could be developed as a way to disperse recreation from other more concentrated areas.	
Jen	Allender	977	4	I disagree with the non-motorized area designations surrounding the Gold Bar Rim, Rusty Nail, and Pritchett Canyon trails. These trails are shown on the alternative maps as a single motorized line running through a non-motorized area. The lack of identifiable or logically-sized corridor inherently creates confusion and is a target for future disputes. These particular trails are historically classic and extremely popular trails that get a huge amount of use.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Robert	Clark	978	1	I did my best to look through allof the alternatives presented and can't find many differences between them. The two things they all appear to have in common is that they do not aknowledge the need for and historic use of the area via motorized means and that they drastically reduce the open areas. The lack of recognition for motorized uses is totally unacceptable. There needs to be an alternative that maximizes all recreational uses, including motorized and non-motorized trails.	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.
Robert	Clark	978	2	There should be a provision in the plan for future growth and expansion of these [SRMA] areas as the need arises.	The addition of acreage to an SRMA would require a plan amendment. However, the DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). See also response to comments 122-15 and 122-30 concerning adding routes to the Travel Plan.
Robert W.	Nemitz	985	1	I would like you to consider reducing the available grazing permits in the Valley to the side of Highway 128 opposite the river.	All specific decisions on grazing are made at the allotment level, using the Standards for Rangeland Health and Guidelines for Grazing Management (see Appendix Q). See response to comment 9-3 and 120-5
Dell	Crandall	988	1	My comment is about an area south and east of Levi Well, located in the S ½ of Section 25 T23S R18E. This has a high density of Cultural	Each of the 33,000 routes was evaluated for its possible impacts to cultural resource, using Class I inventory methods. Many routes were deleted from Travel Plan

				Resources, including rock shelters/residential sites, and numerous rock art panels, including one site that is very unusual and unique in this management area. Most of the shelter sites have suffered pothunting activities. Although there is still extensive lithic scatter, it is disappearing rapidly. A 4 wheel drive/ATV road passes through the center of the area – in some places within feet of sites. Recent camping activity has been discovered.	alternatives due to conflicts with cultural resources. Under Management Common to All Action Alternatives (page 2-7), camping would be prohibited and posted within or on archaeological and historic sites eligible for listed on the NRHP. Archaeological damage violates Federal law. Violations of law are beyond the scope of the land use plan under consideration. See also response to comment 415-13.
Kathryn	Fitzgerald	989	1	As I understand it, some habitats would be protected from construction during vulnerable times for wildlife during the year they drill or roads are constructed. However, as I understand it, no such protection continues after construction. Drills and pumps are not shut down and roads are not closed to traffic in future years, when the animals are no less vulnerable during the designated times; ie, the animals' critical habitats are still destroyed—it just takes longer. If I'm right in this interpretation, I hope that the BLM will rewrite the restrictions on all of these areas to ensure that the habitat remains viable in perpetuity.	Timing restrictions for oil and gas development are for construction activities (road building, well drilling, pipeline construction, etc.). Once wells are drilled and roads and pipelines are constructed ongoing resource extraction can occur during the periods when construction activities are prohibited. These timing stipulations for well drilling, pipeline construction, and road construction are in accordance with UDWR BMPs for protection of big game and other species. UDWR is the agency with jurisdictional authority over wildlife in Utah. These stipulations have been crafted in cooperation with UDWR. UDWR has indicated that these stipulations are sufficient to protect the animals in question.
Richard Lance	Christie	991	1	The point relevant to the DRMP/DEIS which illustrates its incompetence is that there is no credible assessment of the impacts of this rather intense density of motorized recreation on the natural values of lands already recognized by the BLM as having wilderness character, much less resource values on other lands within the Moab Area DRMP's jurisdiction. Eighty-two percent of the lands inventoried by the BLM and confirmed to have wilderness characteristics qualifying them for inclusion in the National Wilderness Preservation System would be "roaded" with designated motorized routes under Alternative C. This is a significant federal action clearly having	The BLM worked with an interdisciplinary team of resource specialists, which included representatives from Grand and San Juan Counties to develop the alternatives for the Travel Plan in the DRMP/DEIS. The ID team reviewed each route for purpose and need weighed against resource conflicts. These conflicts are identified route by route in the GIS data developed for the Travel Plan which is available in the administrative record. The impacts identified for travel management in the DRMP/DEIS are derived from this data.

				environmental effects. What are they? Alas, the DRMP/EIS does not credibly enlighten me.	
Richard Lance	Christie	991	2	The so-called “range of alternatives” in this DEIS does not meet the requirements of NEPA.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. The BLM, in developing the PRMP/FEIS, can chose management actions from within the range of the alternatives presented in the DRMP/DEIS and create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple-use mandate.
Steve	Martin	993	1	We request that you remove the “as amended” part of Alternative A. We also request that all parts of the RMP that deal with any changed to Alternative A be removed as well. The reason this should be removed is by the nature of Alternative A being a ‘no action’ alternative. By amending the alternative you are in effect providing a change. Here are some examples of where you are stating change in Alternative A. This being a 1500 page document I am not able to state all the places in time to make the close of the comment period. Example 1 – In section 2.1.1.7 the last sentence reads “In Alternatives A and D, management of other resources values and uses would take	The No Action alternative (Alt A) is required by CEQ regulations. The No Action alternative provides a basis of comparison for the action alternatives. “As amended” means that the plan amendments to the 1985 Grand RMP are included as part of the Grand RMP.

				precedent over the protection of wilderness characteristics." This is suggesting that there are areas of wilderness characteristics in Alternative A. Please remove Alternative A from this sentence. Example 2. In Table 2.1 Moab RMP Description of Alternatives there are definitions listed for Alternative A as follows; Alternative A (No Action) – All utility corridors would be 1 mile wide, except the existing Moab Canyon utility corridor, which is constrained by the topography of Moab Canyon. This physical corridor is only ¼ mile wide at its narrowest point. Alternative A (No Action) – About 354,015 acres would be exclusion areas for ROWs. About 48,245 acres would be avoidance areas for ROWs. Alternative A (No Action) – The list of parcels identified for disposal totals 12,415 acres. There are just two examples of 'amendments' (change) to Alternative A. Please remove all of them.	
Steve	Martin	993	2	We request that you halt any decision on the RMP until proper and accurate economic and social benefit is studied and included into the RMP in section 3. I am sending along with my comment a copy of The Economic Contribution of Off-Highway Vehicle Use in Colorado report from July 2001. Their report was done my Hazen and Sawyer for the Colorado Off-Highway Vehicle Coalition. I feel this is an excellent example of the kind of economic numbers that are available to the BLM for use. I understand that the report is done for Colorado. I	Throughout its action alternatives, but especially in alternative C, the BLM has sought to provide recreation opportunities and benefits for the wide variety of users, all of whom potentially contribute to the local economy. For the reasons outlined in Chapter 4, pg. 271, the BLM believes that Alternative C (the Preferred Alternative) provides the greatest economic benefit to the MPA's economy in the context of OHV management. The economic value of recreation to the Grand County economy is analyzed in the DRMP/EIS. With the data available, it is not possible to fully separate the economic benefits that accrue from various types of recreationists.

				feel that when the Moab BLM office does a similar report for their area that with the geographic proximity that the numbers will be similar. In the report on pages 4, you will see that there is a total of $519,333,239 spent on OHV recreation in Colorado. This I feel is a considerable amount that is not listen in your RMP in section three as it should. I won a motorcycle shop in Grand Junction and the Moab area is a substantial part of that business. I gross 2.2 mil a year in sales and feel that people from Mesa County traveling to Moab and other travelers account for about 3 to 5 percent of my business. That is about $110,000 a year in income to my business. If that is impacted by a reduction in available OHV recreation the economic and social dis-benefit is a trickle down effect. Lost jobs, lost travel opportunities, and less purchases are just a few that are not included in the RMP. Recently two friends and I took a trip down the Kokapelli, stayed the night in Moab, purchased gas, had dinner and breakfast, rode to Sovereign Trail to Thompson, purchased food and fuel, used the Thompson single-track to come back home to Rabbit Valley. This trip included a huge social benefit to three people. We took time off work, time away from family, traveled to the put in area. Enjoyed the scenery, discussed where we were and the geography of the area we were in, and had a great time. This is the type of social benefit that I feel is not in section three and must be put in there.	The Hazen and Sawyer report was a report commissioned by the Colorado Off Highway Vehicle Coalition. The engineering firm of Hazen and Sawyer analyzed the economic contribution of OHV use in Colorado. The report was paid for with OHV fees and pertains only to Colorado. It does not contain data specific to the economy of Moab, Utah. The social benefit of recreation of all types is recognized in the DRMP/EIS. Appendix F provides specific benefits to recreationists, although the list is not meant to be exhaustive. FLPMA requires that BLM lands be managed for multiple use, of which recreation, including motorized recreation, is one. The DRMP/EIS provides a great deal of recreation opportunities, both to enhance economic return and to provide social benefit to groups and to individuals.
Steve	Martin	993	3	We request that you remove the closure of Gemini	The commentor's desire to keep Gemini Bridges open to

				Bridges area on the basis of migratory and bedding sheep. The reason this should be removed is from your own data concerning water. There is no water listed in that area in your own hydrological study. For this reason the sheep will not bed in this area. It does not take an expert in animal behavior to figure this out. Please remove any closure for the Gemini Bridges in all Alternatives.	motorized travel under all alternatives is noted. The Gemini Bridges route was not closed due to conflicts with bighorn sheep. The conflicts were with other recreationists. Gemini Bridges is a highly used area, and driving over the Bridges is not appropriate at such a crowded location. See also response to comment 206-14.
Alex	Himes	994	1	I am in favor of alternative C but would like to have integral parts of the following trails used in the Easter Jeep Safari added to the inventory of designated routes in Map 2-11-C: Strike Ravine, 3-D Jeep Trail, Flat Iron Mesa. I have included maps showing GPS tracks of existing routes for these trails indicated in red. Please add the missing segments to the designated route inventory on Map 2-11-C. *See map info.	See response to comment 206-11
Fred	Swanson	995	1	There appears to be no case-by-case analysis of (1) the need for each individual route, (2) the likelihood and potential impact of riders fanning out from each route anyway, in spite of the ban on cross-country travel, and (3) whether the needs of vehicle users could be met with a much smaller network of roads, while leaving larger areas of wild land intact.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Fred	Swanson	995	2	The analysis of the overall OHV issue in the EIS is not very illuminating. The document needs to forthrightly address the tremendous loss of wilderness-type recreation opportunities that has occurred since 1985. The discussion of Alternative C should state that under it, places such as Labyrinth Canyon, the Harts Point, and Hatch Point Cliffs, and other undeveloped areas will	The areas mentioned by the commentor have been reviewed by the BLM for wilderness characteristics. Those areas deemed to possess such characteristics are proposed for management to protect wilderness characteristics under one or more action alternatives. The loss of wilderness character referred to by the commentor, for those areas judged to lack such character, is the result of those areas having a large

				continue to suffer serious damage to their wildland values.	number of impacts to naturalness, typically in the form of constructed motorized routes. Most, perhaps all, of these routes have been in existence for many years and predate 1985. The resultant lack of naturalness (and thus wilderness characteristics) is not a result of decisions from the 1985 nor the current plan, but a reflection of the on-the-ground reality. The BLM does not have the legal authority to create roadless areas where they currently do not exist.
Fred	Swanson	995	3	Based on the EIS, it is very difficult to asses the overall impact of each alternative, beyond some broad-brush qualitative comparisons. The EIS breaks up the discussion of impacts into what amounts to a huge matrix, with an analysis of how decisions made under each resource category would affect all other resource categories. This is fine as far as it goes, but there needs to be a "summing up" of the overall impacts on particular resources. The EIS needs to give a clear idea of what will happen to soils, riparian areas, etc. in toto under each alternative. Specifics are needed, not generalities. Ordinarily this could be done under the analysis of cumulative impacts, which is an extremely important part of any EIS. But the cumulative analysis in this EIS is rather cursory and does not provide the in-depth comparison of alternatives that is needed. There needs to be more than a simple qualitative comparison, as in saying that Alternative C would be worse than B but better than D. How many acres can we expect to see stripped of their protective biotic crusts under each alternative? How many miles of stream bottoms and riparian areas would be damaged? How much land would be subject to noisy intrusions from vehicles? Only if the EIS provides such information	See response to comment 123-14 regarding complexity of the DRMP/DEIS. See also response to comment 124-7 about direct, indirect and cumulative impacts. The DRMP/EIS gives estimates of acres of surface disturbance expected under each alternative. Noise is not within the jurisdiction of the BLM.

				is it possible to truly evaluate and compare the alternatives.	
Fred	Swanson	995	4	The EIS needs to assess how route restrictions will realistically be implemented.	See response to comment 122-18
Fred	Swanson	995	5	For each mile of designated route, there should be an assumption factored in for the total acreage of soils damaged on surrounding land.	Disturbance off the road would be illegal under the terms of the Travel Plan. The DRMP/EIS assumes that users will engage in legal activity. Illegal activity is not analyzed in a DRMP/EIS.
Fred	Swanson	995	6	The document should note that mountain biking, as well as motorized OHV use, displaces hikers from trails and routes they have formerly used.	See response to comment 122-9
Fred	Swanson	995	7	The EIS states that OHV use impacts on riparian resources would generally by the same under the preferred alternative as under Alternatives B and D (page 4-246). How can this be when the preferred alternative would designate riparian zones such as Tenmile Canyon for extensive motorized use?	The comparison on pg. 4-246 is based on the number of riparian acres that is “limited” vs. open to cross country travel. Using this level of comparison, there is very little difference among the action alternatives. Additional data regarding the miles of route designated in riparian areas, by alternative, has been added to Chapter 4 and to Appendix G. This mile by mile analysis clearly shows that there is less mileage designated in Alternative B than in Alternatives C or D. See also response to comment 123-51.
Tom L.	Kyle	996	1	Generally I see some flaws in both choice of language and nature of the material. For both the DRMP and the DEIS the lack of clarity between descriptive language intended to be “general guidance” and that intended to be “decision implementing” is quite troubling. When prepared, the Final EIS should make these distinctions much clearer. In addition, the preparation of the FEIS should very clearly state connections between the current facts on the ground and the decisions to be made.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the

					alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis.
Tom L.	Kyle	996	2	The following suggesting with respect to the "alternatives" have been attributed to Mr. Seaman and I concur. Alternatives should include: -Educating the non-motorized visitors about when and where they may encounter vehicle traffic, as well as informing them of areas where they may avoid such encounters. -Educating the vehicle assisted visitor of where the road or trail might be shared with non-motorized visitors, and encouraging slower speeds and a more courteous ethic in these areas. -Re-routing either use so as to avoid sections of roads or trails that are extremely popular with both groups. For example, a hiking trail can be constructed to avoid a section of popular OHV route. Or an equestrian trail may be constructed to avoid a section of popular mountain bike route, etc. -Dispersing all forms of recreational use so as to minimize conflict and create a more desirable experience.	See response to comment 122-18
Tom L.	Kyle	996	3	Several short sections of the Flat Iron Mesa Easter Jeep Safari route are missing from the proposed maps. One missing section includes the popular obstacle "Easter Egg Hill." Hopefully this is an accidental omission, but I (we) want to bring it to your attention.	See response to comment 206-11
Tom L.	Kyle	996	4	On the OHV trail known as Strike Ravine, the obstacle often referred to as "big ugly" has been left off the maps. Additionally, the section of Strike Ravine that crosses Kiley Miller's property is also missing from the maps. The RR4W group has successfully defended the legality of this route in court over the last few years, and this valid route	See response to comment 206-11

				should be included on BLM maps. Short sections of the Easter Jeep Safari routes for Crystal Geyser and 3D trails are also omitted from the BLM maps. Again, this is probably just an accidental exclusion, but something to bring to your attention. Coyote Canyon is a popular OHV “hardcore” trail on public land west of Area BFE. This trail is not included on current proposed maps, but should be established as a designated route.	
Mary	Washburn	997	1	The BLM should consider a SRMA in the Yellowcat area. Many ATV riders like the Yellowcat area. Designating a SRMA there could utilize the dense network of mine roads that already exist.	See response to Comment 122-38
Mary	Washburn	997	2	Some important motorcycle trails are missing from all alternatives. The preferred alternative includes about 100 miles of true motorized single-track. Alternative D adds another 100 miles. But in total, the final plan should keep roughly 300 miles of non-road motorcycle routes from being closed.	See response to comment 122-14
John J.	Ahearn	999	1	It is my understanding that at the same time, BLM has done no site-specific studies to determine the impact of these routes in Native American cultural sites or other natural resources like riparian areas or wildlife habitat. Science to back up the ORV route designations does not exist in this document.	See response to comment 123-12
Jeff	Price	1001	1	I do not see on Map 2-11-E (included) the motorcycle trails that are between highway 191 and Arches, are they included in the travel plan? *see attached maps	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.

Robert L.	Norton	1003	1	I have included a copy of a portion of topographical map (Exhibit #1) that shows a GPS track of the route along the spur road and the slickrock climb. I urge that the BLM allow continued use of this last few hundred feet of route. Exhibit #2 details other Labyrinth Canyon overlooks that I have traveled. *Map included.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Robert L.	Norton	1003	2	On Exhibit #3, I point out a route in that region that is missing on the BLM travel plan maps. *see attached maps	See response to comment 206-11
Harley	Bates	1007	1	I would support Alternative C “Preferred” except for a 2000 foot setback from the road. That is overly restrictive. 2000 feet is over a third of a mile and result in a terrific loss of resource. Even though plan C does not call of a reduction in AUMs, a 2000 foot setback would quickly result in lost AUMs or even total grazing cancellation as the area lost for grazing would be most of the good grazing land. A 2000 foot setback doesn’t make any sense. If the 2000 foot was a typo mistake and it was supposed to be a 200 foot setback, I would endorse alternative C.	The BLM proposes to build a fence set back up to 2,000 feet from Highway 128 in order to address safety issues regarding cattle along Highway 128 and to protect visual resources along the National Scenic Highway. See Reponse to comment 416-1.
Josh	Newren	1008	1	There are several trails that appear to have portions missing on the maps provided. Flat Iron Mesa has 4 parts missing. Strike Ravine has 2 parts missing on the map – such as a portion of the Big Ugly Hill and the portion of the trail that crosses through the Miller property. 3-D – a portion of the trail near the head of mill canyon that is missing from the map.	See response to comment 206-11
Leroy P.	Abernathy	1026	1	I am very angry about 3 specific things associated with this document. 1. The document itself, it's size	This is not a comment that the BLM can respond to, but a statement of opinion.

				(954 pages) and lack of usability. 2. The accusation that OHV users are vandals and theif's. PDF pg 3-87 3.11.2.7.1 Off-Highway Vehicle (OHV). 3. Lack of documentation to support your theory that the OHV community is a Medium user in the Moab area and has minimal economic impact.	
Leroy P.	Abernathy	1026	2	PDF pg. 57 Letter to the Reader: Makes reference to the decision maker but I can't find out who the decision maker is and what weight will be placed on the input based on what criteria.	The decision maker is the Utah State Director of the BLM. This is the signatory of the “Dear Reader” letter. That individual is the decision maker.
Leroy P.	Abernathy	1026	3	PDF pg. 64 pg. ES.5.1 Alternative A- No Action. Designated as No Action but closes 5,062 acres to motorized use.	NRR
Leroy P.	Abernathy	1026	4	PDF pg. 65 ES.5.4 Alternative D: Is focused on Motorized use but has fewer miles designated. Alt A has 4,673 Alt D has 2,890 motorized miles.	NRR
Leroy P.	Abernathy	1026	5	PDF pg. 75 pg 1-5 Example of double speak with legal terms: Read the first sentence last paragraph, and tell me what it actually means. I have no idea what is said there.	This sentence means that each of the four alternatives were developed to emphasize certain uses or values. For example, Alt B emphasizes the protection of natural resources, while Alt. D emphasizes the production of commodities. Alt. C provides a balance between protection and production.
Leroy P.	Abernathy	1026	6	PDF pg. 77 1-7 Section 1.3.2.2 Issue 1: It says "OHV use needs particular attention --- for the protection of other resource values." Does that mean other resources have a greater value than OHV use? What exactly does this mean?	The BLM worked with an interdisciplinary team of resource specialists, which included representatives from Grand and San Juan Counties to develop the alternatives for the Travel Plan in the DRMP/DEIS. The ID team reviewed each route for purpose and need weighed against resource conflicts. These conflicts are identified route by route in the GIS data developed for the Travel Plan which is available in the administrative record. The impacts identified for travel management in the DRMP/DEIS are derived from this data.
Leroy P.	Abernathy	1026	7	PDF pg. 78 1-7 Section 1.3.2.2 Issue 1 Related Recreational Issues: Using the term "conflict" between OHV and other. What does that mean? In my 18 years of riding I have only had one	User conflict was raised as an issue by the public during the scoping period for the RMP. User conflict and displacement is defined on pg. 3-85 of the DRMP/EIS. See also response to comments 6-10, 6-24 and 122-9.

				"Conflict" with another user, she yelled at me. If conflict means "Contact" then that is a whole other disscussion.	
Leroy P.	Abernathy	1026	8	PDF pg. 78 pg 1-8 Section 1.3.2.2 Issue 1 Related Recreational Issues- Last bullet- How will Visual Resources be Managed. What exactly does that mean I have read the VRM in Table 2 but am still confused as to what that means.	The BLM's goals and objectives for visual resources are to protect the quality of scenic values; manage them for multiple use, filming and recreational opportunities; and preserve those scenic vistas that are most important (See Table 2.1, page 2-51). The reader is directed to Section 3.19 for an overview of the visual resources of the area and how they are being impacted by current management practices; and to Section 4.3.18 for an overview of the BLM VRM management class system. The visual portion of Table 2.1 applies the classification system to BLM lands within a range of alternatives designed to meet the goals and objectives listed above.
Leroy P.	Abernathy	1026	9	PDF pg. 79 pg 1-9 Section 1.3.2.2 Issue 6Identifies OHV as a particular impact to Riparian areas. How did you come to that conclusion as in my 30 years of riding I avoided Riparian areas to ride because they are difficult to ride who wants to fall into the river?	The BLM worked with an interdisciplinary team of resource specialists, which included representatives from Grand and San Juan Counties to develop the alternatives for the Travel Plan in the DRMP/DEIS. The ID team reviewed each route for purpose and need weighed against resource conflicts. These conflicts are identified route by route in the GIS data developed for the Travel Plan which is available in the administrative record. The impacts identified for travel management in the DRMP/DEIS are derived from this data.
Leroy P.	Abernathy	1026	10	PDF pg 80 pg 1-9 Section 1.3.2.2 Issue 7: How do you know there are Paleontological locations if they "have yet to be recorded"?	There are known sites for which the details have yet to be catalogued for reference (i.e., recorded). For example, page 3-67 of the DRMP/ DEIS notes that in the Utah Geological Survey fossil database of 246 fossil locations in the MPA, details are lacking in 177 known localities. The probability of paleontological resources is based on the geologic formation that is exposed at the surface.
Leroy P.	Abernathy	1026	11	PDF pg 81 pg 1-11 Section 1.3.2.3 Sixth Bullet down says there348,800 acres of WSA in 11 areas however PDF pg 64 ES.5 says there are 348,815 in 11 WSA locations. Which is correct?	Acreage data may vary slightly due to the mathematical algorithms utilized in GIS software. The final plan will use one figure consistently.

Leroy P.	Abernathy	1026	12	PDF pg 95 Chapter 2.1 table is unreadable. The PDF format is so small that when you blow it up to read the words you are unable to get the full context of where they apply to the other blocks. This is a classic example trying to read the fine print of a contract.	The 11x 17 page size was necessary to show the alternatives side by side so that direct comparison could be made.
Leroy P.	Abernathy	1026	13	PDF pg. 162 pg. 2-74 Table 2 Travel Management OHV. Under Alternative A. It says "destruction of recreational-related Cultural Resources" What in the world does that mean?	The BLM recognizes that destruction of cultural resources is illegal. The analysis summarized in Table 2.2 points out that if people (of any type or activity) do not have access to cultural resources, they can do them no harm. "Recreation related cultural resources" means that recreationists of any type may cause advertent or inadvertent impacts.
Leroy P.	Abernathy	1026	14	PDF pg. 275 pg.3-77 3.11.1.2.9 Kane Creek Crossing. You say "Off Highway Vehicle play at camp is the major threat to senic values to the area" If you have ever been to this area you would know that most all of this area is not visible to someone traveling on the access road most of it is in a low lying area blocked by the trees and bushes adjacent to Kane Creek. Unless you can see through the trees riding in this area hass little if any affect on "Senic Value".	The scenic vista the commentor refers is experienced by all recreationists in the area. Off road vehicle play is currently illegal in the Kane Creek Crossing Area. It is not entirely confined to the riparian area and is not entirely invisible to those travelling on the Utah State Scenic Backway (Kane Creek Road). The commentor should remember that visual resources are not the only values in the Kane Creek area. Riparian values are also affected by cross country travel. In addition, the trees are not foliated all year long, and cross country OHV riders can be seen, even in the riparian areas, during some parts of the year. The BLM has been directed to designate open OHV areas only where other resources are not at risk. There are many other resources in the Kane Creek Crossing area, including visuals and riparian.
Leroy P.	Abernathy	1026	15	In this section you state: "A survey conducted by the institute of Outdoor Recreation and Tourism (IORT 2002)" Why were only Mountain Bikers surveyed? It "appears" that the survey was conducted in the Slick Rock area and focused on the use of the Slick Rock area. This is a partial survey of users and limited to a specific area.	Slickrock Trail was chosen because it was one of the first trail designated primarily for mountain bike use and is one of the most popular mountain bike trails in the world, and due to its popularity it as has a variety management issues including crowding, vegetation trampling, soil compaction and erosion, safety, litter, and vandalism. Mountain bikers were chosen by the Institute

					of Outdoor Recreation and Tourism as the sample survey group because the authors wished to gather information regarding perceptions regarding management of mountain biking. The BLM cannot dictate to Utah State University (home of the IORT) where to or on whom to conduct its research studies. The DRMP/EIS acknowledges on page 3-79 that the survey is not indicative of the entire mountain biking community. The study can be found in its entirety at http://extension.usu.edu/files/publications/publication/NR_RF_012.pdf
Leroy P.	Abernathy	1026	16	You have OHV use listed as a medium level of activity. Based on my 18 years of use in the Moab area, looking at the number of Motorized carriers vs. non-motorized carriers in the parking lots I believe that this table is wrong. How did you come to that conclusion?	Table 3.18 merely attempts to give some indication of the levels of recreation use. OHV use (dirt biking and ATVing) does not approach the levels of "jeeping", hiking, sight seeing or camping. The preliminary data from the National Visitation Use Monitoring Study (NVUM) (2006) is provided in Table 4.67. This preliminary data confirms the use levels given in Table 3.18. The commentor should remember that the recreation use levels are for all BLM lands. For instance, the commentor may recreate in the White Wash area, which mainly has OHV users. The hundreds of thousands of recreation users along Highway 128 are counted as "sightseeing" and/or "hikers". The conclusions in Table 3.18 are based on observational data of BLM staff. The numbers in Table 4.67 are the preliminary NVUM results.
Leroy P.	Abernathy	1026	17	You say in this paragraph that motorized use has increased which seems to contradict what you put in the table PDF pg 278 pg 3-80 Table 3.18 activities in the MPA by Use Level.	A use may increase without that use being the "highest use". For example, an increase from 10 to 20 is a 100% increase. If another value is at 100 and has no increase, 100 is still 5 times greater than 20. Thus, increase and rank order are not equivalent.
Leroy P.	Abernathy	1026	18	PDF pg 283 pg 3-85 3.11.2.6 User Conflict and Displacement: Second paragraph you site as an example that mountain bikers in the Gemini bridge	See response to comment 122-9

				area have been displaced by the "faster moving and louder modes of transportation" First time I went to Gemini Bridge area was in 1990 and there were no Mountain Bikers in the area, for that matter what few mountain bikers that were in Moab, almost all of them were in the Slickrock area. They may not be choosing to go to the Gemini Bridge area but they are not being displaced.	
Leroy P.	Abernathy	1026	19	You list 9 examples of conflict area. Every one of these conflict area lists motorized as one of the conflict parties. This supports my theory that the majority of use in the Moab area is by motorized users.	See response to comment 122-9
Leroy P.	Abernathy	1026	20	Last sentence "may lead to increased vandalism and theft" How did you come to the conclusion that OHV users are vandals and theifs? How can this document be an unbiased report on the best use of BLM land if you feel that a particular user group are vandals and theifs?	The BLM does not conclude that OHV users (or recreationists in general) are vandals and thieves. Access to sites makes it easier for those who are vandals to vandalize. Vandalism may occur if access is on foot, horseback or non-motorized boat.
Leroy P.	Abernathy	1026	21	Again having no idea how you came up with the number of respondents. What is the basis for this table. It is not explained in this chapter	For a discussion of Table 3.18, see response to comment 124-15.
Leroy P.	Abernathy	1026	22	PDF pg652 pg 4-272 4.3.12.2.10.6 Alternative D. This whole section seriously flawed. Pharaphrasing, the more OHV users, the less likely the other users will not return to the Moab area and thus hurt the overall economy. That assumes that the OHV user community has a greater impact without increasing itself. This whole study disproves that because you have continued to state that the OHV community and it's presence is increasing. Increasing the OHV activity increases the Moab Economy. I also contend that the OHV community spends a great deal more money in Moab than any other user group. The OHV user group is the one staying in the	See response to comment 124-127

				motels/hotels and eating at the restaurants. The mountain bikers, hikers are the ones sleeping at the campsites and using the ground as a toilet facility	
Leroy P.	Abernathy	1026	23	In many areas in this study you have stated that you do not fully understand how much money is being spent by each of the different user groups yet you have come to the conclusion that severly limiting the motorized community will not have an economic impact.	Any assessment of the social and economic impact of a decision covering a 15-20 year timeframe will have elements of speculation. BLM used best available data to assess impacts. The BLM has no data to separate out motorized versus non-motorized recreation spending (assuming that the two groups are completely distinguishable). The BLM's discussion to which the commentor refers is heavily qualified, due to the lack of available data on which to project economic impacts from changes from recreation patterns under the various action alternatives. On pg. 4-269 of DRMP/EIS, the BLM argues that should OHV use decline in the planning area, it is possible that there could be a decline in local revenues.
Leroy P.	Abernathy	1026	24	The fact that comments are needed on Alternatives for the RMP and the Alternatives for the travel plan is not made clear in the document. The difference between an RMP (general guidance) and the Travel Plan (implementation decision) is not clearly described in the DEIS. The FEIS should clearly articulate the difference.	See response to comment 124-71
Leroy P.	Abernathy	1026	25	The current proposal is unworkable because it confines a huge amount of vehicle use into a very small area and the area's boundaries are not well defined and cannot be easily identified on the ground.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Leroy P.	Abernathy	1026	26	Because the open area boundary will not be easily identifiable on the ground, and also because of easy access to the proposed "fee area" from all directions, it will make this proposal extremely	The commentor is referring to the White Wash open area. See response to Comment 123-35. The BLM asserts that the boundaries of the open area in Alt C (preferred alternative) can be adequately delineated for

				difficult to enforce. We suggest the BLM consider other funding mechanisms to pay for needed management infrastructure.	public understanding. Enforcement actions are administrative and do not require land use planning decisions.
Leroy P.	Abernathy	1026	27	The Final RMP should mandate that adaptive management practices be used across the Field Office	Adaptive management merely means using site specific factors to guide future decisions.
Leroy P.	Abernathy	1026	28	The Final RMP should direct mitigation efforts will be exhausted prior to closure	Mitigation can be put in place without an emergency limitation or closure.
Leroy P.	Abernathy	1026	29	The Final Rmp should direct land managers to work with the affected public to ensure all available mitigation efforts have been exhausted before closure.	Mitigation can be put in place without an emergency limitation or closure.
Leroy P.	Abernathy	1026	30	When using adaptive management principals, the RMP should mandate the mitigation of closing routes and areas to recreational use by designating a more sustainable, but similar recreational opportunity elsewhere.	Adaptive management merely means using site specific factors to guide future decisions.
Leroy P.	Abernathy	1026	31	The final EIS should disclose how many campsites would be closed under each Alternative.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus the number of campsites closures depends upon site specific conditions.
Leroy P.	Abernathy	1026	32	I am not sure based on the maps provided which campsites will actually be closed.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping. The process in which BLM evaluates existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. Under all alternatives, BLM may restrict camping when

					damage to an area becomes obtrusive (See Appendix E, Section E.1.2); thus number of campsites closures depends upon site specific conditions.
Leroy P.	Abernathy	1026	33	All SRMAs with a motorized focus should include direction regarding when and how additional or expanded routes/areas would be provided should there be a need.	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).
Leroy P.	Abernathy	1026	34	SRMAs and their "focus areas" should avoid excluding other uses categorically. The preferred Alternative clearly shows Moab BLM recognizes the importance of providing some motorized routes in non-motorized "zones"	See response to comment 413-9.
Leroy P.	Abernathy	1026	35	The Utah Rims SRMA is necessary to properly manage this popular area. It should have a motorized and mountain bike focus, and include the ability to designate or construct routes should they be needed in the future. In addition, limiting camping to one small designated area, in the RMP, is not wise. The RMP should provide general direction and not limit camping in such a way.	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). See response to comment 122-39 regarding the proposed boundary
Leroy P.	Abernathy	1026	36	The Utah Rims SRMA should extend further southwest to southwest to encompass Mel's Loop and beyond. Increased visitation there warrents the more active management of a SRMA. This larger area would also provide enough room for a full-days motorcycle ride, and the establishment of a mountain bike focus area.	See response to comment 122-39.
Leroy P.	Abernathy	1026	37	Some of the "motorcycle trails" are very popular with ATV users. The final travel plan should designate a mix of single track and ATV trails.	The BLM has worked with the user groups to delineate those motorcycle routes that are appropriate for ATVs. The PRMP/FEIS shows those routes that are for both ATVs and motorcycles. In addition, the DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).
Leroy P.	Abernathy	1026	38	The FEIS should consider designating more ATV trails, especially between White Wash and Red Wash. We strongly suggest looking closely at the	The BLM has worked with the user groups to delineate those motorcycle routes that are appropriate for ATVs. The PRMP/FEIS shows those routes that are for both

				proposal developed by Ride with Respect.	ATVs and motorcycles. In addition, the DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS).
Leroy P.	Abernathy	1026	39	An open area in addition to White Wash could provide different terrain for everything from bicycle free riding, to trails motorcycling to hard core rockcrawling. As 99% of the Moab Field Office becomes limited to designated routes, open areas play an even more criticle role for accommodating specialized sports. Perhaps parts of Black Ridge could remain unrestricted for this purpose.	Although this issue was raised during scoping, the application in the DRMP/DEIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Leroy P.	Abernathy	1026	40	The Utah Rims single-track network should include at least 25miles of additional routes, in order to be as complete as the Dee Pass Network.	See response to comment 122-46
Leroy P.	Abernathy	1026	41	In particular, long-distance single-tracks and ruged roads that connect SRMAs offer a unique experience. The Copper Ridge Motorcycle Loop should be combined with Thompson Trail in the final plan.	See response to comment 122-36
Leroy P.	Abernathy	1026	42	A few more non-riparian washes should be left open, especiall in the Cisco Desert. These travel-ways provide ATV and motorcycle riders an unconfined challenge that roads cannot.	See response to comment 122-14
Leroy P.	Abernathy	1026	43	When addressing "user conflict" the Final RMP should avoid "exclusive use zones" where, based on preceived or potential "user conflict," one or more "conflicting uses" is categorically prohibited. Most of the non-motorized focus areas have been designated routes open to motorized vehicles within them. If implemented as written in Alternatives B, C, and D, many visitors will perceive these focus areas as establishing blanket restrictions on motorized use.	See response to comment 413-9.
Leroy P.	Abernathy	1026	44	Assumptions made concerning the economic impact to the Moab area have no documented information to support those assumptions	Any assessment of the social and economic impact of a decision covering a 15-20 year timeframe will have elements of speculation. BLM used the best available data to assess impacts; in many cases, no data were

					available. In a landscape level plan such as the RMP, qualitative discussions are often all that are necessary (or even possible).
Leroy P.	Abernathy	1026	45	The document shows a clear bias against the OHV user group PDF pg. 285 pg. 3-87 3.11.2.7.1 Off-Highway Vehicle (OHV).	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, [four] alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Moab DRMP/DEIS provides in comparative form the management actions associated with each alternative.
Garth	Illingworth	1029	1	The Draft Moab RMP has serious flaws. It gives far too much weight to exploitive and environmentally destructive activities.	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping

					process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, [four] alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Moab DRMP/DEIS provides in comparative form the management actions associated with each alternative.
Garth	Illingworth	1029	2	As a 4x4 and ORV user I would actually like to see less trails and more areas of quiet and solitude made available. Every square mile does NOT need an ORV trail and immediate access. The quality of the outdoor experience is being systematically destroyed by excessive ORV trail use. The Draft Moab RMP needs to be changed to limit ORV use, not increase it.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Garth	Illingworth	1029	3	The changes that have occurred between earlier BLM draft plans and the current plan are a betrayal of the broad goals of the BLM and its responsibility to be a steward of the lands for all Americans, for a wide variety of uses, balanced across all regions - not just large extractive industries whose political contributions bias local, state, and federal processes.	The specific changes referred to by the commentor are so vague that a response is not possible.
Garth	Illingworth	1029	4	The limited time available for responses to such	See response to comment 124-1.

				large changes are also symptomatic of a process that is being distorted for narrow goals by self-interest groups.	
Denice	Swanke	1030	1	Page 1-2, last paragraph. Due to ease of access and through formal agreement with the Moab FO, the BLM Vernal FO presently manages a small amount of public land (33,331 acres) at the top of the Book Cliffs along the northern portion of the MPA. Management decisions for these 33,331 acres are contained in the Vernal RMP and are not re-evaluated in this EIS. Note: the language at the bottom of page 1-11 re: Black Ridge Canyons has good wording for this as another option for rewriting. I believe the above sentence appears in the Executive Summary as well and it should be revised.	The commenter is is referring to 2 different areas. The text on page 1-11 refers to the Black Ridge Canyons wilderness area, which is managed by the Grand Junction FO. The area referred to on page 2-1 is the in the northern Bookcliffs and is managed, by agreement, by the Vernal FO.
Denice	Swanke	1030	2	P. 1-10 Issue #9. A fire management plan would be developed to address high risk areas, fire prevention, prescribed burns, rehabilitation and restoration, hazardous fuels reduction, and the protection of life and property. Note: this text differs from other issues statements because the above sentence indicates future planning. Does that carry throughout the document? And are all issues evaluated in light of future planning that will tier to the RMP/EIS? I'm sure they are, but only says so overtly for one issue is at least a yellow flag. I would revise or delete the above sentence and make the statement about the need for and commitment to future fire management planning later (probably in the affected environment for this issue). Look at Issue 10 as a template if you decide to reword #9. This comment may be meaningless as it relates to completed analysis/might not be worth the time to	The text in question has been revised. The revised text states: Fire management planning is necessary to address these and other wildfire related issues.

				address because of that.	
Denice	Swanke	1030	3	P 1-16, section 1.4.8. It seems reasonable to mention the relationship of the MPA to Grand RMP here, unless it was already covered in the description of the planning area (i.e., is there a discussion of the relationship of “old” to “current” terminology for the areas of administrative responsibility – Moab FO vs. Grand RA for example.)	The relationship of the current RMP revision to the Grand RMP is explained on the first page of Chapter 1.
Denice	Swanke	1030	4	P 2-1, Section 2.1, last paragraph This paragraph talks a lot about decisions – I noticed this wording earlier in the document as well. “Proposed management actions” or “actions” seems like a better choice of words in light of the fact that the RMP/EIS is not a decision document. This would be a search/replace chore, because I notice “proposed decisions again in 2.1.1.3 and elsewhere.	Commentors suggestion is noted. The correct terminology has been used in the PRMP/FEIS.
Denice	Swanke	1030	5	P 2-5, section 2.1.1.5.What does “spread by alternative” mean? Clarify. Timing Limitations and Controlled Surface Use stipulations are applied to the habitat for these four species under each alternative.	In the DRMP/DEIS "Timing Limitations and Controlled Surface Use stipulations are applied to the habitat for these four species and are spread by alternative" means that these stipulations are varied by alternative to create a reasonable range of alternatives with respect to timing and controlled surface use stipulations intended to reduce impacts to these species. Either the time period or the acreage has been increased in Alt. B (Conservation) and/or decreased in Alt D (Commodity).
Denice	Swanke	1030	6	P 2-5, section 2.1.1.7….all of them would be protected and managed to preserve their wilderness characteristics and values in Alternatives B. Or maybe you just want to say “to preserve their wilderness characteristics”?	The word “value” was chosen deliberately.
Denice	Swanke	1030	7	P 2-63, Health and Safety. This seems like a narrow definition of health and safety, what about occupational exposures, etc?	Occupational exposure is not a land use planning issue; it is governed by the Occupational Health and Safety Administration.
Denice	Swanke	1030	8	P 2-76. Fire mgmt comparison across alts seems	The impacts of fire management decisions on riparian

				incomplete – wouldn't there be greater improvements to riparian under some alternatives vs. alt A?	resources are the same across all alternatives because all fire management decisions are common to all alternatives; they do not vary by alternative. See pages 2-8 through 2-10 in the DRMP/DEIS.
Denice	Swanke	1030	9	P 2-90, table 2.2, column for Alternative C/WSR segments. Duplicate text appears in this column	Duplicate text has been deleted from the PRMP/FEIS.
Denice	Swanke	1030	10	P 3-29, section 3.6.2.1.3. It would be reasonable (and consistent with 3.6.2.1.1, 3.6.2.1.2 and subsequent sections) to list R&PP actions within the MPA if any have occurred since the 1985 RMP—or state that none have occurred.	The only R&PP actions within the MPA since 1985 have been an R&PP lease to Dead Horse Point State Park (165 acres), and an R&PP patent to Grand County for the Klondike landfill (80 acres). This information is found in the Analysis of Management Situation, pg. 6-6, which is available on the RMP website.
Denice	Swanke	1030	11	P 4-1, last paragraph. For the analysis, BLM staff used existing data, science, current methodologies, professional judgments, and projected actions and levels of use. The analysis takes into account the stipulations described in chapter 2 and describes how each alternative would change the conditions described in chapter 3.	Comment noted, thank you.
Denice	Swanke	1030	12	P 4-10, section 4.3. Existing conditions are described in chapter 3. I can only assume that existing conditions are described for more than air quality…If this statement truly is specific to AQ, it should be moved to 4.3.1.	The statement the reader refers to will be moved from Section 4.3, to Section 4.3.1 Air Quality.
Denice	Swanke	1030	13	P 5-4, section 5.2.1.1 Tribal Concerns, Comments, and Recommendations Below is a summary of the tribal consultation and coordination meetings held during the RMP planning process. Only comments concerning actions in the Moab FO are included below. The second sentence is unclear because it implies that consultation was undertaken for more than the Moab FO. Maybe this is the intended message: Although the planning area encompasses Arches National Park, Dead Horse Point State Park, and the La Sal Mountains of the Manti-La Sal National	Consultation was initially undertaken jointly for the Moab and Monticello FOs. After the initial consultations, the Moab and Monticello Field Offices undertook separate consultation process. Chapter 5 of the DRMP/EIS covers only the consultation efforts made by the Moab Field Office. Comments relating to the Monticello planning effort are not included in Section 5.2.1.1 of the Moab DRMP/DEIS; the consultations concerning the Monticello plan are contained in the Monticello DRMP/EIS. The commentor is correct in assuming that tribal

				Forest, consultation and comments are limited to actions proposed in the Moab FO.	consultation efforts only included Moab BLM planning decisions. Other federal agencies engage in their own tribal consultation efforts.
Paul W.	Holyoak	1038	1	am opposed to the four proposals that will do away with cattle grazing in the Millcreek allotment. I purchased this allotment for $18,000 from Carol Meador. I asked the BLM if there would be problems – no one told me about the proposed changes or that there might be problems. Grazing permits should be kept in the Millcreek area.	The BLM analyzed the natural and cultural resources that are present in the 3,921 acre Mill Creek allotment and decided that this allotment would be made unavailable for grazing in the three action alternatives of the RMP. The Mill Creek allotment is in an area of very high cultural occurrence. It has high recreation conflicts and is within the municipal watershed of Moab and Spanish Valley.

ORGANIZATIONS

Organization	Record ID & Comment Number		Comment Text	Response to Comment
Colorado Plateau Archaeological Alliance	1	1	An examination by CPAA of the Moab Field Office Draft EIS has identified deficiencies as they relate to cultural resources, both in terms of general theoretical assumptions applied throughout the document, as well as specific strategies identified for addressing cultural resource concerns. One such fundamental concern is the absence of a meaningful and representative statistical sample of inventoried lands within the Moab Field Office whereby the density, diversity and distribution of cultural resources could be adequately considered during the planning process.	In preparing the PRMP/DEIS, the BLM used the best available information to form the basis for the cultural resources analysis. This baseline data is a result of Section 106 and 110 inventories of the area and represents the volume of information available. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. Since the Section 106 and 110 inventories that have been done make up all of the cultural resource information that presently exists in the Moab Field Office, this information forms the basis for the DRMP/EIS discussion. Any surface disturbing activities based on future proposals would require compliance with Section 106 and site specific NEPA documentation.
Colorado Plateau	1	2	Of the alternatives presented in the Draft EIS, Alternative B offers the best management approach to	Regardless of the planning decisions chosen in the PRMP/FEIS, the BLM will adhere to all laws, regulations

Archaeological Alliance			facilitate the long-term preservation and protection of cultural resources. It is also acknowledged that Alternatives C (preferred) and D are both improvements over the current management approach to lands within the resource area (e.g., no action Alternative A). It is also emphasized that the management alternatives articulated in all three action alternatives may be inadequate to meet the BLM's obligations under federal laws and regulations regarding protection of cultural resources.	and policies concerning cultural resources. The RMP does not supercede laws, regulations or policies. The commentor's preference for Alt. B is noted.
Colorado Plateau Archaeological Alliance	1	3	The failure of the agency to adequately consider the direct, indirect, and cumulative effect of various activities on the integrityof historic properties, for example the absence of Section 106 compliance prior to the official designation of OHV routes; (2) The failure of the plan to consider Class III inventories of areas adjacent to proposed OHV routes but clearly witin the area of potential effect and (3) The failure of the agency to more aggressively embrace its Section 110 responsibilities to edtentify, evaluate and nominate properties under its management jurisdiction ot the National Register of Historic Places.	The BLM analyzed cumulative impacts in Chapter 4 and presented a reasonable estimate of what may happen to cultural resources as a result of trends in management direction, oil and gas development, increased recreational use of public lands and the protection or lack thereof afforded by the various alternatives. While these impacts are impossible to quantify, the Draft RMP/EIS presents what the BLM considers to be a realistic and qualitative forecast of the general types of impacts that may be expected from various uses. This forecast is comparative; for example, these kinds of impacts would increase or decrease more under alternative X than they would under alternative Y. The analysis is based in large part on existing legislation, regulation and policy that require inventory and mitigation on all federal undertakings. The DRMP/EIS acknowledges that the illegal activities, such as vandalism and looting, may be impacted by changes in access, as is specifically identified in section 4.3.2. In particular, Chapter 4 notes that increased access to cultural sites could increase contact by visitors who could intentionally damage sites by collecting surface artifacts, vandalizing, illegally digging, or otherwise excavating the sites. The DRMP/DEIS does analyze under the various alternatives the illegal activities in association with the level of access as restricted by the

				alternatives and does not imply that illegal activities are restricted solely to the areas adjacent to the OHV routes. The BLM will comply with its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with Section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the Area of Potential Effect and compliance with Section 106 prior to designation. Class III inventory of the APE and compliance with Section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available.

				See the Appendix for SHPO concurrence with Section 106 consultation. The White Wash open area has already been surveyed for cultural resources. The Area of Potential Effect for any project is determined in consultation with the appropriate SHPO/THPO in accordance with 36 CFR 800.4(a)(1). This will occur upon initiation of the Section 106 consultation process for this RMP. The BLM integrates the protection of resource values such as cultural resources with its responsibilities for land use planning and resource management under FLPMA to ensure that the affects of any activity or undertaking is taken into account. In addition, National Programmatic Agreement, which regulates BLM's compliance with National Historic Preservation Act, serves as the procedural basis for BLM managers to meet their responsibilities under Section 106, and 110. Until 1980, Section 106 of the NHPA required agencies to consider the effects of their undertakings only on properties listed on the National Register of Historic Places. However in 1980, Section 106 was amended to require agencies to consider an undertaking's effects on properties included in or eligible for inclusion in the National Register. Since that time the BLM, through its land use planning process, outlines specific management prescriptions and mitigation measures to protect sites both listed and eligible for the National Register. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation.
Colorado	1	4	CPAA strongly disagrees that Class III inventories	The BLM will adhere to its Section 106 responsibilities as

Plateau Archaeological Alliance			should not be required prior to official designations that allow continued use of existing routes.	directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available. See the PRMP/FEIS for SHPO concurrence with Section 106 consultation. The open OHV area in the White Wash Sand Dunes area

				has undergone an on-the-ground Class II cultural inventory.
Colorado Plateau Archaeological Alliance	1	5	The Draft EIS should clearly articulate the agency's intent ot avoid or minimize all impacts, including indirect and cumulative impacts, that may alter, directly or indirectly, the character of historic properites, inclduing TCPs, "in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association" (36C CFR 800.5 (a)(1).	The DRMP/EIS on pg. 2-7 states that damage to TCP's would be avoided. The BLM will follow all laws, regulations and policies regarding TCPs. The BLM analyzed cumulative impacts in Chapter 4 and presented a reasonable estimate of the incremental impact to cultural resources as a result of trends in management direction, oil and gas development, increased recreational use of public lands and the protection or lack thereof afforded by the various alternatives. While these impacts are impossible to quantify, the DRMP/DEIS presents what the BLM considers to be a realistic and qualitative forecast of the general types of impacts that may be expected from various uses. This forecast is comparative; for example, these kinds of impacts would increase or decrease more under alternative B than they would under alternative D. The analysis is based in large part on existing legislation, regulation and policy that require inventory and mitigation on all federal undertakings.
Colorado Plateau Archaeological Alliance	1	6	CPAA recommends that the term "visitation" be clearly defined to include all uses of public lands that are shown to endanger the integrity of sties esligible for lsiting on the National Register (e.g.,industrial, vehicular, recreational.	Visitation means the use of public lands by recreationists, whether on foot, on horseback, or in a vehicle. Industrial uses of the public lands are not considered visitation.
Colorado Plateau Archaeological Alliance	1	7	Camping should be prohibited at sites eligible for listing on the National Register. CPAA recommends that this prohibition be extended to include a ban on camping "on or Near" elibgible sites.	On pg. 2-7 of the DRMP/EIS, a management decision common to all action alternatives states: "Camping would be prohibited and posted within or on archeological and historic sites eligible for listing on the National Register of Historic Places." "Near" is far too vague a term to include the PRMP/EIS. When posting this decision, the BLM extends the camping ban to a reasonable and enforceable distance, as it has at Sego Canyon Rock Art Site.
Colorado	1	8	"Class III inventories of Areas of Potential Effect (APE)	The BLM has considered the cumulative impacts of its

Plateau Archaeological Alliance			will be conducted in connection with new OHV routes prior to such designations". CPAA agrees but also recommends tha this language be modified to reflect the agency's intent to consider the cumulative impacts from designating thousands of miles of official routes. Concerns related to nature and scope of such Class III inventories are addressed below.	decisions in Chapter 4 of the DRMP/EIS.
Colorado Plateau Archaeological Alliance	1	9	"The BLM will cooperate with counties to ensure road and trail construction and maintenance minimized impacts to cultural resources. CPAA recommends this language be modified to reflect a preferred strategy of avoidance of impacts to cultural properties, with a secondary strategy of minimizing impacts when avoidance is not possible.	The word "avoid" has been added to the sentence.
Colorado Plateau Archaeological Alliance	1	10	CPAA agrees that the site density model may be a valuable tool in identifying some areas with higher potential for cultural resources. CPAA also agrees that it is difficult to plan for and manage cultural resources that remain largely unknown and undocumented. However, CPAA believes that model is fundamentally flawed as a primary planning tool in that the data used to create the model are derived from previous archeological inventories that do not comprise a meaningful and statistically valid sample. These investigations were driven by the location of extraction projects and other site-specific uses of federal lands that did not result in the investigation of all the environmental and ecological ranges where cultural resources are likely to occur. Hence, the predictive model used by BLM staff to identify probability zones for cultural resources is actually a reflection of the amount of Section 106 compliance in a particular area and may not reflect actual site densities. A review of archeological site data on file with the Antiquities Section of the Utah Division of State History reveals astonishingly few archeological block surveys within the MFO that would contribute to an understanding of	See response to comments 124-25 and 415-1.

			potential site densities or to the distribution of archeological sites across an entire landscape.	
Colorado Plateau Archaeological Alliance	1	11	Although the identification of areas such as Tenmile Wash, Mill Creek, and Dolores Triangle as priorities for such surveys are laudable and should be encouraged, this approach fails to address broader perspectives of prehistoric land-use patterns across entire landscapes, including areas of low probability.	Ten Mile Wash and Mill Creek were identified as priority areas for surveys because of there known potential for occurrence of cultural resources. The Dolores Triangle was prioritized due to lack of cultural information in this area. The prioritization of areas does not mean that other areas won't be surveyed.
Colorado Plateau Archaeological Alliance	1	12	Hence, management considerations articulated in the various action alternatives are predicted on site quantity rather than actual site significance. This approach fails to recognize that sites of tremendous scientific and cultural significance may be located in areas deemed to have a low probability for archeological sites, and that the rarity of such site may actually accentuate the importance of those sites within the context of broader cultural landscapes.	The cultural model developed in the DRMP/EIS was for analysis purposes only. It will not be utilized to determine actual site significance. On pg. 4-30 it states that model was developed as a means of estimating general site densities. Impacts of the alternative management actions were then assessed "with regard to how much of the action is likely to result in surface disturbing activities within the high or medium density zones. This method enables a quantifiable assissment of probable relative affects of planning action alternatives.
Colorado Plateau Archaeological Alliance	1	13	It is therefore recommended the probability model developed by BLM planners be augmented to include addition variables that would precipitate greater understanding of the potential impacts to significant cultural resources from the various action alternatives. These variables should include, at a minimum, site types and National Register eligibility. These data are readily available on the Intermountain Antiquities Computer System database (IMACS) and could be incorporated into the probability model with minimal effort. Such data would better facilitate management decisions related to significant sites or clusters of significant sites in low probability areas.	See response to comments 1-12, 124-25, and 415-1.
Colorado Plateau Archaeological Alliance	1	14	Any assumption that site avoidance results in no adverse effects, or insignificant effects, is inherently flawed and is at odds with 36 CFR 800. Avoidance of cultural sites evident on the ground surface may avoid	The BLM agrees with the commentor that site avoidance does not always mean that there are no adverse affects.

			direct damage to the surface evidence. However, there is a potential for damage to archeological sites not clearly evident on the site surface, as well as adverse effects to sites outside the area of direct impact. Particularly relevant is 36 CFR 800.5(1) that states "an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Consideration shall be give to all qualifying characteristics of a historic property…" (emphasis added; See also 65 Fed. Reg. 77698, 77720 (Dec. 12, 2000) discussing indirect effects).	
Colorado Plateau Archaeological Alliance	1	15	It is therefore recommended that the EIS clearly acknowledge the indirect adverse effects of undertakings on historic properties, and it should include a clear strategy with measurable benchmarks to avoid, minimize or mitigate those indirect effects through the Section 106 review process.	The BLM acknowledges that there may be potential adverse effects from the proposed management actions in the alternatives of the PRMP/FEIS on cultural resources. Avoiding, miniimizing, or mitigating indirect effects to cultural resources through the Section 106 process is a legal requirement and is reiterated on pg. 2-7 of the DRMP/EIS.
Colorado Plateau Archaeological Alliance	1	16	The Draft EIS should reflect the intent of the BLM to adequately consider all indirect impacts of undertakings on National Register-eligible properties that may be a consequence of the undertaking but not directly related to it. Such intent is not now articulated in Draft EIS.	See response to comment 1-15.
Colorado Plateau Archaeological Alliance	1	17	CPAA concurs with that assessment, but also recommends that the Draft EIS be modified to acknowledge that recreation on such a massive scale could result in cumulative effects to site setting and integrity, even if the historic properties themselves are not directly impacted by vandalism and/or looting (see 36 CFR 800.5(a)(2)(v)).	While Special Recrreation Management Areas (SRMAs) are proposed for designation in the alternatives of the DRMP/EIS, the numbers of people visiting the Moab area can not be controlled by the land use plan. SRMAs allow the BLM to impose special rules on visitor use thereby reducing potential impacts to cultural resources. In the cumulative impact ssection on pg. 4-502 of the DRMP/EIS the BLM acknowledges the continually increasing visitation and its affects on cultural resources. However, it goes on to say that "recreational activity in

				and around the Moab planning area would continue to increase regardless of which alternative the BLM selects for its RMP.
Colorado Plateau Archaeological Alliance	1	18	The designation of thousands of miles of OHV routes within the MFO has significant potential to create cumulative adverse effects that are not anticipated by the draft EIS.	The Travel Section in Chapter 3 of the DRMP/EIS presents the baseline (current situation) for analysis in Chapter 4. It discusses the ongoing and baseline issues surrounding cross-country travel that is currently permitted by the existing land use plan for the Field Office. The planning area was inventoried as having 6,199 miles of non-paved routes. This number represents the baseline for analysis, however, it is also recognized that cross-country travel is currently allowed in many other areas within the Field Office. The impacts associated with cross-country OHV use are described in Chapter 4 under the No Action Alternative. The action alternatives limit travel to designated routes. The routes that are already in use are considered part of the baseline, and therefore, it is not reasonable to consider the impacts to vegetation from these already disturbed linear surfaces.
Colorado Plateau Archaeological Alliance	1	19	The fundamental component of the Draft EIS Travel Plan is the BLM's intent to establish thousands of miles of designated trails suitable for OHV travel, and the stated management strategy that Section 106 compliance (e.g., Class III inventories) will not be required prior to designation of routes currently in use. As such, the Travel Plan is fundamentally flawed on two important points: (1) The failure of the BLM to conduct adequate analysis in the past related to OHV impacts along routes currently being used by motorized vehicles was and still remains an abrogation of agency's Section 106 responsibilities, and the failure of the agency to recognize or correct this deficiency in the new Travel Plan appears to validate and perpetuate the agency's failure to comply with Section 106 requirements in the past; and (2) The failure to require Class III inventories along routes prior to designation suggests the agency	See response to comment 124-43.

			official has already made a determination, as per 36 CFR 800.3(a), that travel route designations in such instances are not an undertaking as defined in 36 CFR 800.16(y).	
Colorado Plateau Archaeological Alliance	1	20	On this point, the Draft EIS reflects remarkable inconsistencies. The BLM clearly recognizes OHV travel is an activity requiring Section 106 review in that Class III surveys would be required for all "new" OHV routes. But no such requirements are articulated for routes currently in use, even though Section 106 compliance should have occurred in the past related to these activities.	See BLM Instruction Memorandum No. 2007-030 for Travel Management considerations and Cultural Resources.
Colorado Plateau Archaeological Alliance	1	21	As stated throughout the Draft EIS, the BLM clearly recognizes that OHVs have significant potential to cause future adverse effects to historic properties, and that these adverse effects are already accelerating due to growing OHV travel along and adjacent to routes already in use. But no convincing rationale is offered as to why Section 106 compliance will be required in the future, but pre-existing uses are exempt from compliance.	See response to comments 1-3 and 489-3.
Colorado Plateau Archaeological Alliance	1	22	CPAA has been unable to identify any public outreach effort by the BLM in Utah to educate OHV users as to the fragile and irreplaceable nature of cultural resources, to promulgate proper etiquette among OHV users who visit these resources or to enlist the vigilance of the OHV community in reporting vandalism and looting.	On pg. 1-11 of the DRMP/EIS it states that education is an issue addressed through policy or administrative action.
Colorado Plateau Archaeological Alliance	1	23	However, the more designation of official OHV routes is meaningless without a BLM commitment of necessary resources to enforce such travel restrictions. The MFO has not demonstrated such a commitment in the past, as evidenced by the willful and repeated violation of travel restrictions in Tenmile Canyon and the tepid BLM enforcement response to widespread violation (Spangler and Boomgarden 2007)	On pg. 1-11 of the DRMP/EIS it states that enforcement is an issue addressed through policy or administrative action. See also response to comment 124-38.

Colorado Plateau Archaeological Alliance	1	24	Given that caveat, it is imperative that Section 106 compliance be initiated as a component regardless of which alternative is chosen. In short, the BLM cannot manage for and properly protect resources that the agency does not know are there.	See response to comment 1-20.
Colorado Plateau Archaeological Alliance	1	25	As discussed in Section 3.3.2.3, formal listing of sites on the National Register occurs for a small portion of the total sites in any given county or state (DEIS 3-14).	Comment noted, thank you.
Colorado Plateau Archaeological Alliance	1	26	The tiered approach reflected in the three action alternatives (more under Alternative B, less under Alternative C and even less under Alternative D) is problematic and would appear to reflect a common misperception that National Register designations are accompanied by greater levels of protection for listed resources.	All cultural resources are protected by law regardless if they are listed on the National Register or not. The priority for nominating cultural sites to the National Register has been removed.
Colorado Plateau Archaeological Alliance	1	27	CPAA recommends that the BLM consider two addition areas for listing on the National Register. As discussed above, the Tenmile Canyon drainage features a potential for 310 to 385 sites within a narrow, spatially defined canyon corridor from Dripping Springs to the canyon confluence with the Green River.	According to the BLM's land use planning handbook (1601-1), nominating cultural resource sites to the National Register of Historic Places is not a land use planning decision.
Colorado Plateau Archaeological Alliance	1	28	Another area worthy of consideration within the Draft EIS is an expansion of the current boundaries of the Desolation Canyon National Historic Landmark along the Green River corridor in lower Desolation and Gray Canyons.	See response to comment 1-27.
Colorado Plateau Archaeological Alliance	1	29	CPAA recommends the Moab Field Office Draft EIS reflect support for expanding NHL boundaries to include all of Desolation and Gray Canyons give (1) The BLM management of the river corridor is identical for NHL properties along the river, (2) the non-NHL properties are all federally or tribally owned, (3) the historic properties within the NHL are identical to sites outside the NHL that have been deemed eligible for listing, (4) most BLM lands adjoining the river are wilderness study areas afforded significant environmental protections,	Expanding the NHL boundaries does not require a land use planning decision.

			and (5) there is widespread public support for maintaining the remarkable environmental and cultural values found in Desolation and Gray Canyons.	
Colorado Plateau Archaeological Alliance	1	30	As expressed above, CPAA is fundamentally concerned that BLM decision making has been predicated on insufficient data related to the nature, diversity and distribution of archeological resources within the planning area, and the Draft EIS articulates dew proactive measures whereby these data gaps will be ameliorated. Quite simply, the BLM cannot manage resources it does not know exist, and management decisions made without baseline data will inevitably result in adverse and unanticipated consequences to the integrity of historic properties. This is particularly relevant to the Draft EIS Travel Plan where thousands of miles of OHV routes would be designated without any attempt to determine the nature, diversity, and distribution of cultural resources that have already been adversely effected along those routes, or that could be adversely effected in the future.	See response to comment 489-3. Furthermore, FLPMA states that in the development of land use plans the BLM will rely, to the extent it is available, on the inventory of public lands, their resources, and other values
Colorado 500	6	1	Comments start at #3.	Comments start at #3.
Colorado 500	6	2	Comments start at #3.	Comments start at #3.
Colorado 500	6	3	I would like the BLM to change the language in the Alternatives and in the Introduction so that BLM's intentions for the Bookcliffs ERMA are fully disclosed. From page 1-11 "Introduction" please note that MFO has no wilderness areas of its own; 5,200 acres of the Black Ridge Canyon Wilderness Area lies in the MFO but is managed by the Grand Junction Field Office. Now Please refer to page 2-30, Alternative C, "Manage the Bookcliffs area (335,457 acres) for non-mechanized recreation, especially equestrian use, hiking, backpacking and big game hunting. It would be managed for low frequency of visitor interaction by not	Under Alt B of the DRMP/EIS, the Bookcliffs are to be managed as a SRMA emphasizing hunting, hiking, and backpacking. In Alts A, C, and D the Bookcliffs are to be managed as the Moab ERMA. ERMA management is defined on pg. 2-29. On pg. 2-43 of the DRMP/EIS it is stated “Manage the Black Ridge Wilderness Area (5,200 acres) part of the McInnis Canyon National Conservation Area…” The Moab and Grand Junction Field Offices have an agreement on the management of the Wilderness Area. That portion of the Bookcliffs that is within WSAs is managed under the Interim Management Policy for Lands

			establishing new motorized or mechanized recreation routes, no commercial motorized permits would be issued, and competitive events would not be allowed. Now Please note what BLM has omitted from the analysis: Although described in glowing ecological terms in Chapter 3, the Bookcliffs are in fact an extremely hostile environment. It is not conducive to pleasurable hiking, backpacking, or equestrian use, because there is no permanent water and it is lethally dry for human habitation (from page 3-2: The average annual precipitation of the northern section of the MPA is 9.2 inches). BLM accurately describes that there is very little human access. Why? Because not only is it not unusually scenic, it's not a comfortable place for "traditional pedestrian and equestrian recreation activities. That is why there are few roads, no popular hiking trails and no developed recreational areas. And with no roads, how can anybody go big game hunting? Horses need established routes exactly as vehicles do. Summertime temperatures often exceed 100 degrees with extremely low humidity.... There is no contiguous or even sparse vegetative canopy to provide relief from the relentless heat. Winters are harsh with night-time temperatures dropping well below freezing for sustained lengths of time. The wildlife is hardy and hostile and presents well-documented dangers to humans and domestic stock. It appears as though the BLM is doing what is called in the trade "manufacturing Wilderness." This is a covert effort to circumvent both FLPMA, which strictly limited the BLM's authority to set aside lands, and more recent judicial proceedings, which affirmed FLPMA and further limited BLM authority to "set aside" lands.	Under Wilderness Review. In Alt C of the DRMP/EIS no lands are proposed for management to protect non-WSA lands with wilderness characteristics. Hiking, backpacking, and primitive hunting are human activities which occur with some regularity in the Bookcliffs. All motorized travel would be managed in accordance with the Travel Plan accompanying Alt C of the PRMP/FEIS. This plan provides designated travel routes in the Bookcliffs. Motorized travel would be restricted to these routes. The BLM contends that the affected environment in Chapter 3 of the DRMP/EIS adequately describes in the environment for the Bookcliffs area.

			The closures proposed in this RMP correspond exactly with the polygons of the WSA's in the Bookcliffs, plus enough proximate acreage added by BLM and called "areas with wilderness characteristics outside of the WSA's" to create a large block of land in which human activity is illegal.	
Colorado 500	6	4	Referring to Chapter III, on page 3-72, MFO states “at least” 1.6 million people visit the MPA per year. That is, one million six hundred thousand people visit because of various and different intrinsic values present in the MPA. On page 3-109 the figure “2 million” visitors is cited. For the purpose of our analysis, we use the 1.6 million numbers. This could be confirmed by presenting the numbers that were collected at the 16 traffic counters that were named in the Analysis of the Management Situation, also called the AMS (a separate document from the DEIS, required by the BLM 1600 planning regulations but in this case was not published as part of the DEIS)> However, BLM has elected to leave out of the DEIS all information about the presence of these traffic counters. BLM relies exclusively upon staff estimates and various regional tourism data. In order that our results be exactly comparable, we will base our analysis on the same material. On page 3-82, table 3.19 sorts recreation activities according to use levels. Since we are allocating land use, we would logically look at the high-use column to see How our limited agency resources would be best utilized. “River Activities” is found in the high-use column. Here the recreation use numbers on four segments of river in the MPA are provided. Although the DEIS does not say so, we will assume this represents annual river use. The total appears to be 92,000 boaters. The word “boater” clearly indicates individuals, not groups. More	The BLM acknowledges that it does not know the activity that each and every visitor comes to Moab to enjoy. Furthermore, the Moab Field Office does not know the exact numbers of visitors that come to the planning area. The text in Chapter 3 of the DRMP/EIS states that the field office has “at least” 1.6 million visitors; it is also stated that the actual number may be up to 2 million visitors. There are 16 traffic counters in the Moab Field Office. If the commentor wishes to know the locations of these counters, he may call and ask for the locations of these counters. To further understand visitor numbers, the Moab BLM participated in the National Visitation Use Monitoring Study in 2006 (these data are still being analyzed). The purpose of Table 3.18 (reference is in error) was to give a general idea of the types of activities that are engaged in by visitors. With so many activities in the Moab planning area, 11% participation can represent a high use activity.

			than four river segments are described in Chapter 3 but the overlap of use between segments is not reported. Thus, it is reasonable to calculate that the total could be 184,000 boaters. If the reader does the arithmetic using the numbers provided in the DEIS, boaters constitute 11.5% of one million six hundred thousand visitors. Because Table 3.19 sets forth three undefined categories: “high, medium, and low,” placing the 11.5% in the “high use” column clearly indicates this high use relative to the uses names in the “medium” and “low” columns. Accepted. However, bear in mind the perception shift when the phrase “high-use” replaces “eleven percent.” Flowing from that, bear in mind the degree to which that shift may affect development of all the proposed actions. To further define the activity proportions provided in table 3.19, hiking is also listed as a “high use” activity. Yet how to calculate the actual number of hikers visiting the BLM lands in the MPA? The usual Agency method is to count vehicles at trailheads, and to count visitor contacts, but the known results of this method always produces an undercount. The only government agency attempts to quantify the accuracy of this method revealed that personal contacts with visitors, even when it is the only job assigned to a park ranger, will touch just 10% of the total visitors (Applegate & Hamilton; USDA Forest Service Mendocino N.F. 1993 Annual Report to the State OHMVR Division). For the purpose of the recreational land use allocation on two million acres of public land, we prefer calculations that might provide a stronger basis for decisions affecting more than one million people.	
Colorado 500	6	5	The Moab BLM lands are not one contiguous maze of beautiful canyons and wind-sculpted cliffs. Mostly it is thousands of miles of dirt roads, vast, featureless and	Hiking is a very common recreation activity in the Moab Field Office. The preliminary National Visitation Use Monitoring (NVUM) study data indicate that hiking is the

			sparsely vegetated acreage (just one example to provide proper evidence for our point here: DEIS page 1-162 states, “desert shrub” covers 41% of the BLM lands in the MPA; that is greasewood, shadescale, saltbrush, blackbrush; these species survive in alkaline and salty soils…and they are not scenic. That is to say, people coming from Oregon or Kansas or Washington D.C. do not come to see the greasewood). Hostile desert temperatures (see page 3.1.2 Climate, from Western Regional Climate Center 2004 Temperatures and precipitation for meteorological stations in Eastern Utah), no shade, no permanent water, and no reliable maps. With description in mind, it must be admitted that most of the BLM lands in the MPA are not an attractive hiking destination. Hiking as an activity, does not commonly occur throughout the BLM lands in the MPA. To develop a successful recreation program for pedestrian activities such as hiking, it must be kept in mind that the vast majority of hikers arriving in a desert environment want a marked trail that is short and predictable, and that as a rule, a recreation hikers do not hike alone in unmarked territory, and even more reliably, hikers want a scenic or remarkable destination for their hike. Furthermore, if 1.6 million people were hiking elsewhere off of the popular hiking trails, we would find user-made hiking trails on every acre of the Field Office, because user-made trails are a manifestation of demand. We do not find any new user made hiking trails because the best places to have hiking trails in the MFO are already occupied by hiking trails. What we do find is vast starches of lands under the MFO jurisdiction with no footprints on them whatsoever. Literally tens of thousands of acres and the only tracks are roads, used exclusively by motorcycle, ATV, and 4 wheel drive	single most commonly engaged in activity in the Moab planning area. (The NVUM study was done in the Moab Field Office using the U.S. Forest Service data-gathering system. It involved actual random interviews with visitors). There are many popular hiking trails in the Moab planning area on BLM lands, including Corona Arch, Negro Bill, Fisher Towers, Amphitheater Loop, Hidden Valley, and others. The trail register data for the Negro Bill Trail alone shows that over 25,000 people per year hike the trail. The BLM stands by its assertion that hiking is a popular recreation activity in the Moab planning area.

			motor vehicles. No footprints. None. If the reviewers of this document disagree, we want you to provide factual evidence that this description is not true. So. Because we know that the hiking trails on BLM could not possible be occupied at the rate of 50,000 people per mile, stretch that out over a season. Let's say that BLM hiking trails receive use on the order of 50,000 people per mile per season, and a season is seven months of the year as noted on page 3-72 in the DEIS. That gets the on-the-ground population of hikers down to 1,786 per weekend, at the occupancy rate of 89 people per mile. The trails would be occupied at a rate of one hiker every 60 feet. That is still only 3.125% of the total visitor-ship to the MPA. Imagine only taking a hike and meeting someone every 60 feet. Does this amount of hiking actually occur? It can be safely assumed that it does not, because CEQ regulations require that wherever it is available, document and factual information be used to develop the "Affected Environment" chapter, and BLM 1600 Planning regulations require documented, factual information be used to develop the "Analysis of the Management Situation (AMS). It is unlikely in the extreme that MFO staff would conceal those kinds of numbers. So, we can use the old fashioned person-contact-&vehicle-count method that we know always results in an undercount, or we can estimate according to the maximum carrying capacity of the present hiking trails, but either method, the actual number of people who hike in the MPA very likely amounts to about 5% of the 1.6 million visitors per year.	
Colorado 500	6	6	Camping is also found in the "high use" column, so let's do the numbers for developed camping opportunities. Conspicuous by its absence in the DEIS, are the actual	The purpose of Table 3.18 in the DRMP/EIS on pg. 3-80 is to show the range of activities that visitors are engaged in within the Moab Field Office. A general range of use

			number of fee-paying campers at the 22 fee campgrounds. This is a significant omission. Without any hard numbers, the reader must extrapolate using the information that is provided: According to the MFO recreation website, there are 450 campsites (including the fee sites), with a vehicle limit of 2 per site, and using the most generous standard visitor-use multiplier of 3.5 people per vehicle this adds up to 3,185 people per weekend if every site is at the legal occupancy limit, Multiple that by 28 (weekends in the seven-month season see page 3-72), and we have 89,180 people stashed in the campgrounds each year. Add another 40,000 people for the people who are there during the week or who don't pay their fees or who pack too many people into their campsite, that gives us 129,000 people camping in developed sites. That's another 8% of the MFO annual visitor-use of 1.6 million. If we assume that the hikers and the people in the developed campgrounds and the boaters are discrete groups to be counted separately, all of the above named activities together amount to only 22.6% of the 1.6 million people that visit Moab BLM land each year.* ** (Find another way to calculate it. Or, please provide hard numbers of actually counted people to support the statement in Table 3.18. If there are no hard numbers please add this statement to the "Affected Environment:" NO ACTUAL VISITOR NUMBERS ARE AVAILABLE TO SUPPORT THE INFORMATION IN TABLE 3.18.	levels was provided based on available data including actual observations from BLM staff. The BLM does not accept the calculations that the commentor has performed. The note at the Table 3.18 clearly states that this list was provided by BLM staff. There is no claim that these estimates are based on actual visitor accounts. See also response to comment 122-3. The numbers of paying campers visiting the Moab Field Office is publicly available information. There is no attempt in the DRMP/EIS to not provide for lower use activities. For instance, two Focus Areas are provided for Basejumpers in Alt C which are a very low use group.
Colorado 500	6	7	In the calculations above, the three activities [boating, hiking, camping] described are afforded the benefit of being counted as three discrete groups, entitled to their own numbers. It is more likely that there is a tremendous overlap, given that most of the developed	The National Visitor Use Monitoring Study (NVUM) was completed by the Forest Service in 2006. The data gathered from visitors during that year using random sampling has not been fully analyzed. Table 4.67 provided some very preliminary data from the NVUM

			camping areas are near rivers and notable natural features. Recall if you will, these activities are analyzed because they are listed in the “high use” column of Table 3.18 on page 3-80. If hiking, at 3.1 % and boating, at 11.5%, and camping, at 8% of the total are considered “high-uses,” then the number of people participating in the activities in the “low-use” category must be minuscule. The entire list in the low-use category could not make up the difference. With no actual numbers to work with, the reader might guess that each of those eight activities in the low-use column might constitute 2% each of the totals, combining to claim 16% of the 1.6 million people, or another 25,600 people. Remember, BLM placed the activities in the “low-use” category. They must, by implication, constitute smaller percentages than anything else in the other two columns. In other words, the three “high-use” activities (hiking, boating, and camping) are placed into the same high-use category as something else---and that “something else” accounts for 80% of the activities that people come to Moab BLM to pursue. Looking for more clues about what people do on Moab BLM lands, we find on page 4-192 of the DEIS Table 4.67 “Recreational Activity Participation.” The table is described in Chapter 4 as follows: “The National Visitor Use Monitoring Study, completed in the MPA in 2006, provides reliable data on user group participation. Visitors were asked what their “main activity” was while visiting Moab, and what activities they were participating in during their visit. The	study. These preliminary visitor activity data were provided in Chapter 4 of the DRMP/EIS for analysis and because the Moab Field Office have fielded many questions regarding visitor activities. There is a wealth of other data in the study which will be available to the public at the time of its publication. When complete the NVUM study will be available for the Moab BLM on the US Forest Service website. In the interim, a draft copy of the study is available by contacting the Moab Field Office. See also response to comments 122-2 and 124-2. The NVUM data provided in Table 4.67 do not support the claims made by the commentor. NVUM data were gathered only on visitors to BLM lands. Visitors were asked where they had recreated. Only those visitors who had recreated on BLM lands were interviewed. National Park, State Park or Forest Service visitors were not interviewed for the NVUM Study and data from these visitors are not included. The BLM has no evidence that interest in hiking, camping or boating is waning. The preliminary NVUM data support these conclusions.

			numbers in Table 4.67 show what activities visitors engage in as a percentage of use." This table is reporting on the "MPA" or, the Moab Planning Area. What is the MPA? According to Map 1-1, "Planning Area," and on page 1-2 to quote: "The MPA encompasses Arches National Park, Dead Horse Point State Park, the La Sal Mountains of the Manti-La Sal National Forest, and the Uintah/Ouray Indian Reservation." No source for this study is provided and it is not readily available to reviewers of the Moab DEIS. If this survey was professional done, the resulting data would far exceed the scant information provided by Table 4-67, thus what is provided in the table is clearly compressed and arranged by MFO staff, The absence of any information about where this survey was physically conducted is conspicuous and by itself, invalidates the words "reliable data" in the context of BLM managed lands. The phrase "while visiting Moab" can mean only one thing; the respondent is in or very near to the town of Moab. Why? Because any organization trying to acquire sufficient numerical data to do a "study" of human activity patterns is going to go to where the highest densities of humans are. The proximity and paved-road access of Arches National Park for exclusively nonmotorized and scenic driving on improved roads will unequivocally skew the numbers toward nonmotorized activities such as "hiking, backpacking, relaxing, viewing, camping and scenic driving" (on improved roads). Furthermore, Moab itself is not a popular starting point for backpacking, so it is even more critical that we know where this survey was taken and where the "backpacking" numbers fit in, as we already know	

			that the vast majority of the BLM lands under examination in this RMP are not suitable for backpacking or equestrian activities. The reader is left to wonder if this "study" is appropriate to BLM managed lands at all, because it is hard to find a connection between the 1.6 million BLM visitors and the respondents to this survey. We need the EIS writers to help us here, yet they conspicuously do not. Do all 1.6 million BLM lands visitors pass through the town of Moab? Surely MFO staff does not think any reviewer of this document will believe this. We request that this study be presented in full in the appendix, including the source and the methodology. The reason is, in its current presentation, this study odes not appear to provide accurate information for planning decisions on BLM managed lands. If MFO staff has selected data that is inappropriate to BLM managed lands, a long term mis-allocation of resources will result. If the presentation of the entire study reveals that it is not appropriate to this DEIS, we request that the study be removed from the document and its conclusion must not be used in this analysis. So how do we figure out what people are doing when they visit BLM lands in Moab? The DEIS writers do supply us with solid numbers for the tourism-related tax trends. Table 3.35 on page 3-19 reveals that the total Gross Retail Sales in Grand County (not just the town of Moab) have continued to climb between 1997 and 2003. So, people are visiting. Continuing on page 3-109 the DEIS writers state: "Visitation to the Grand County area, outside of BLM lands, follows the traveler-spending trend, as it increased throughout the 1990s and has leveled off in the new century. The following table shows visitation numbers for several locations in Grand County that can be used as indicators for visitation to the area." This is a rather astonishing misstatement, because the table that follows on page 3-110, Table 3.36, "Visitation	

			Trends," does not support the writers' statement that visitation has followed visitor spending trend. Comparing the figures in Tables 3.35 and 3.36 reveals that while visitor spending has climbed slightly, visitation to the parks (Arches, Dead Horse, and Canyonlands) has dropped, and dropped rather precipitously in the "new century." Please correct this false statement. And we are still asking the question, what are those 1.2 million "other" visitors to Moab BLM doing? They are clearly losing interest in passive activities like "scenic driving" and in the hiking opportunities and developed camping opportunities offered int eh parks shown in Table 3.36. Yet plenty of non-residents are still spending money in Grand County.	
Colorado 500	6	8	Now please refer to 3.11.1.2.1 The Colorado Riverway. QUOTE: "The Colorado Riverway includes the public lands managed by the BLM in the following areas: Along the Colorado River and Utah Highway 128 from Dewey Bridge to U.S. 191, including Negro Bill Canyon Trailhead, Onion Creek, Castleton Tower (Castle Rock) and Fisher Towers. Utah Highway 128 is a State Scenic Byway, and is also a portion of the Prehistoric Highway National Scenic Byway. Along the Colorado River and Utah Highway 279 from Moab Valley to Canyonlands National Park, including Wall Street, Poison Spider Trailhead and Shafer Basin. Utah Highway 279 is a State Scenic Byway. Along Kane Creek Road from Moab Valley to the block of state land south of Hunter Canyon, including Amasa Back totals 76,503.35 acres. A very small portion of this area (Dewey Bridge to Castle Creek) is within the Colorado River SRMA, with the great majority of the Riverway lying within the Grand ERMA. The Riverway is the most popular destination of MPA visitors, with recent visitation estimated at approximately 1.04 million people. Visitors engage in camping, hiking, four-wheel	Fee recreation programs are not a planning issue, but are rather regulated by the Federal Land Recreation Enhancement Act. The camping and boating programs management by the Moab BLM are self-funded. Campers at developed campgrounds pay fees which are used to maintain the campgrounds. Boaters pay for the operation of the boating program. The activities referred to by the commentor receive less of the “attention” because they do not generate fees for the maintenance of these activities. Throughout the DRMP/EIS, motorcycling, four wheel driving and dispersed camping are provided for. Alt C of the DRMP/EIS provides 280 miles of motorcycle route, and over 3,000 miles of four wheel drive routes. The Moab planning area has over 1.6 million acres that are available for dispersed camping. A great deal of “attention” has been paid to these recreation users in the DRMP/EIS.

			driving, scenic auto touring, mountain biking, bouldering, BASE (Building, Antennae, Span, Earth) jumping, rock art viewing, dinosaur track viewing, rock climbing, and rafting and boating within the Colorado Riverway." ...while we do not dispute BLM's statement that this is a very popular area, we do think that by working backward from the estimate to the carrying capacity of the geographical area, 1.04 million people cannot possibly want to return for an enjoyable relief from the confines of urban life, because it would be like going to New York City without the buildings. ...by withholding the actual counter numbers, and providing only "estimates," BLM has created an un-credible scenario. It is not our intent to declare that 1.6 million do not visit. It is our intent to use the information provided by BLM in this analysis to demonstrate that because the heavily used areas require so much detailed and expensive Agency attention (campgrounds, restrooms, boat launches, permit systems), BLM has failed to account for an entire demography which requires almost no attention: Long-distance off-road driving, using motorcycles and 4WD vehicles, and dispersed camping in self-contained travel trailers and motor homes.	
Colorado 500	6	9	Why do we say this is (visiting Co. River SRMA) is what the other 1 million people are doing? To answer this question, we do have hard numbers, supplied by the writers of this DEIS. On page 3-84, we learn that Utah OHV registration has jumped 207% statewide, and 305% in Grand County during the same time frame the above non-motorized and "passive" visitation has dropped. (Table 3.36) Conspicuous by it absence in the DEIS is any mention of the increase of OHV registration in Colorado (recall page 3-84 of the DEIS: "It is important to note that the majority of OHV and dirt bike users on the Moab BLM lands are residents of Colorado"). Because the Moab DEIS has omitted any	OHV registrations have increased in both Utah and Colorado since 1998. This is acknowledged in Chapter 3 of the DRMP/EIS. Percentage increases do not always mean greater raw numbers than for other types of users, however. In addition, there ris anecdotal evidence that registrants in Utah have increased since 1998 due to more compliance with registration laws. The BLM does not accept the commentor's statement that "passive" visitation has dropped. At the same time, the BLM acknowledges that registrations have increased. Alt C. of the DRMP/EIS provides recreation opportunities (in 30 Focus Areas) for all types of recreation activities,

			information about Colorado OHV visitors, we will use The NSRE 2000-2003 Colorado Outdoor Recreation Study (SCORP) for hard numbers about Colorado trends. On page 37, Table 7, they found a 37.28% increase in "land resource-based activities." Table 8 shows a 37.44% increase in trail/street/road activities and in the same chart, "outdoor adventure" saw a 31.41% increase. According to this study, between 1995 and 2003 the number of people participating in the activity called "primitive camping" increased by only 6% while Colorado OHV registrations increased by 223%. We think the DEIS writers provide us with a highly suitable description of the phenomena that is occurring, on page 10-25 of the AMS: QUOTE: "It may be surprising to some that the Moab FO area receives more visitors than the surrounding national parks (see Table10-5). However, many of the activities that visitors come to the Moab area to enjoy can only be done on public lands. For instance, OHV activity, mountain biking, rock hounding and other such activities are available on BLM land, and not on national park lands. In addition, once visitors come to the area to visit a national park, they find that there is a much larger land area available for recreation outside those national parks." The sheer remoteness of what these folks discover poses a different problem for BLM planners: how do you count those people? The answer is, the Moab Field Office apparently does not. The MFO has no traffic counters on the roads that access the start points for these sorts of trips, or, if they do, they have omitted them from this analysis. MFO has no counters on the popular motorcycle trails. MFO has no counters on the prime long-distance routes that people come from all over the world to ride. And MFO has never surveyed any visitors in their self-contained motor homes in the remotest parts of the Moab Field Office.	both motorized and non-motorized. The Moab Field Office has or has had traffic counters throughout the planning area, including in popular OHV areas such as the road to White Wash, Ten Mile, the Kane Creek Road and Cameo Cliffs OHV SRMA. The National Visitor Use Monitoring Study sampled visitors throughout the field office area, including motor home users engaged in dispersed camping.

Colorado 500	6	10	To summarize: Between 1997 and 2006, 1. Visitation to Arches N.P. (non-motorized) has dropped 11.5% (DEIS Table 3.36) 2. Visitation to Dead Horse S.P. (non-motorized) has dropped 20% (DEIS Table 3.36). Visitation to Canyonlands NP (non-motorized) has dropped 13.5% (DEIS Table 3.36) . Interest in primitive camping in Colorado increased by only 6% (Colorado SCORP 2003) 5. OHV registrations in Utah have increased by 205% (DEIS Table 3.21) 6. OHV registrations in Colorado increased by 223% *Colorado SCORP 2003) 7. Interest in "outdoor adventure" increased by 31.4% Colorado SCORP 2003) 8. Interest in "trail/street/road" activities increased by 37.44% (Colorado SCORP 2003) 9. Moab BLM lands provide the essence of trail-dependent outdoor adventure by virtue of the vast unmapped road system and hostile desert environment (DEIS Page ES-7) 10. Tourism-dependent revenue in Grand County has remained steady (DESI Table 3.35); 11. MFO has no visitor numbers for BLM lands outside the developed activity areas 12. The source citation for Table 3-18 page 3-80, "Activity by Use Level" states that these proportions are purely anecdotal, and note derived from any factual source such as traffic counters or surveys. 13. BLM's visitation estimates for the "most popular" BLM sites are so far beyond those sites' carrying capacity that the estimates are not credible. These thirteen items together reveal the flaw in the analysis: When the factual information is placed alongside the voids in information, without hundreds of pages between them, we find some very strong clues. There are 1.2 million visitors to Moab BLM lands who are not camping, hiking or boating. These "new century" recreationists appear to want to participate more actively in their public land experience, and off highway vehicles are clearly one of the primary instruments of this demographic and cultural shift. II. What to do	The Moab BLM did not have accurate numbers on the activities engaged in by visitors when the planning process started. That is the reason why activity use levels in Table 3.18 are classified as “High”, “Medium and “Low”. If exact use numbers were known, exact use numbers would have been provided in the table. See also response to comment 122-3. Since the inception of the planning process, the Moab BLM office was a pilot office for the implementation of the National Visitor Use Monitoring study that is standard operating procedure in Forest Service areas. Preliminary data were available at the time of the DRMP/EIS. Since the largest unknown recreation factor was activity use levels, the preliminary data were supplied from the NVUM study in Table 4.67 regarding the percentage of BLM visitors engaging in various activities on Moab BLM lands. BLM lands in the planning area were surveyed, including the backcountry and dispersed areas mentioned by the commentor. The data in Table 4.67 represents the best information that the BLM has regarding the activities that its visitors engage in during their stays in the Moab area. The DRMP/EIS provides for the needs of motorized users, as is evidenced in the 3,693 miles of four wheel drive routes and the 282 miles of motorcycle routes. Visitor numbers were not an indicator of how much attention should be paid to the activities of various visitors. If that were the case, BASEjumping (with its low visitor use numbers) would not be provided for at all. All of the motorcycle trails that were submitted by the public during the scoping period and were verified on the ground by BLM staff were considered for designation in the alternatives for the Travel Plan. As described in Appendix G of the DRMP/EIS, the purpose and need for each route was weighed against possible resource

			about it. What are we asking for, now that sufficient doubt has been cast upon the visitor activity numbers as presented in the Draft EIS? We will only ask for things that are possible for the BLM to accomplish within the scope of this analysis, in order to produce a timely and defendable Record of Decision. The details and citations supporting the following six requests begin on page 13. I. Recall from the above analysis of hikers and hiking trails that user-made trails are a manifestation of demand. Cutting the available mileage in half for any user group will resolve none of the problems set forth in the Purpose and Need statement. Therefore, we want to have all existing road and trail mileage designated by this decision. We will provide peer-reviewed research to assist BLM in justifying this change. Incorporated into this change we fully expect the BLM to conduct site specific analyses (during the decision steps that follow the Record of Decision) of any routes or areas that BLM considers resource problems. If time permits, there may be some areas that this EIS will analyze in sufficient detail to enable a change in designation with this Decision. II. We want all of the motorcycle single-track maps submitted by the public during this comment period to be placed into the designated trail inventory, including but not limited to the routes submitted by the Colorado 500 in separate comments. III. We especially want the BLM to abandon the major change of course that omitting 271 miles of "motorcycle trail" represents. This mileage was named in the AMS as "motorcycle trail," and "Motorcycle trails" were discussed during the time the "scope" of this analysis was being determined. We consider this omission a questionable change of course because the mileage was withdrawn after the public could no longer provide input, and after the time that is customarily available for dialogue between the affected public and the BLM ("scoping"). This withdrawal was apparently	conflicts. See response to comments 124-71, 122-15 and 122-30 for a description of the Travel Plan process and on how to add new routes after the Travel Plan process is complete. See the response to comment 208-2 for an explanation of why all inventoried routes are not found in Alt. C. There are 282 miles of motorcycle routes designated in Alt C. A planning bulletin was issued during the scoping period of the land use planning process to interested parties that specifically asked the public to submit all route data in a timely manner. All data submitted by the public was considered during alternative formulation. See Appendix G for an explanation of the travel planning process and for a list of those who submitted route data. No trails were “withdrawn” from consideration. All motorcycle trails were not designated in Alt C because some of them posed unacceptable resource conflicts. For instance, the motorcycle route along the Hidden Canyon Rim had unresolvable conflicts with cultural resources. This route was not designated for use by either motorcycles or by bicycles. The motorcycle routes on the top of Duma Point were inventoried and verified by BLM staff. They were not designated because of conflicts with bighorn sheep escape terrain. The management concepts described by SRMA in Appendix F are required by BLM policy. The Land Use Planning handbook (H-1601-1) requires the BLM to identify, for each SRMA, the recreation opportunities, outcomes and benefits. The manual further requires the setting character to be delineated. The commentor is correct that this is new; the previous planning manual did not require these items to be identified. However, the planning manual that

			initiated by staff with no explanation or legal authority for doing so. IV. We want the BLM to abandon certain management concepts that this Draft EIS newly introduces to public lands recreation management, as described in Appendix F and called "Activity-Outcome-Benefit" charts, upon which many of the land allocations have been created. These concepts fall outside the authorities as set forth in FLPMA and BLM 1600 Handbook, and they are confusing to the public. In a separate comment we will provide an explanation for this request that will sufficiently justify dropping those concepts without changing any of the major outcomes desired by BLM in this EIS. V. We want the BLM to revise the discussions in Chapter 3 that relentlessly repeats that people using motor vehicles are the cause of 80% of this "problem" that BLM calls "user conflict," because the fact is, at least 80% of the visitors are using motor vehicles as the primary instrument of their visit. VI. We want the BLM to review the references used in support of the Analysis, and remove all inappropriate, obsolete, or mis-used research. We will be happy to provide current research to guide staff as they strive to avoid decreasing MFO's present road and trail carrying capacity.	was issued on March 11, 2005 (Appendix C, pg. 15) requires the identification of these concepts. The BLM has received reports of user conflict from visitors. BLM staff have experienced user conflict in the field. The BLM does not lay blame for these conflicts with any one group. The issue of user conflict was raised by the public during scoping, and the BLM is required to address user conflict as an issue in the development of alternatives. The list of instances of user conflict in Chapter 3 was provided to address user conflict as a part of the affected environment. The BLM is not aware of any inappropriate research in the DRMP/EIS. There is no attempt on the part of the BLM to deliberately decrease the Moab Field Office's road carrying capacity. The BLM worked closely with its county cooperators (Grand and San Juan counties) to provide a transportation system that accounted for the recreation uses of roads by the public. For instance, all Jeep Safari routes are in Alt C, as are almost all routes used regularly by recreationists. The BLM consulted guidebooks and commercially available maps to ensure that these routes were included, for the most part, in the Travel Plan accompanying Alt. C. See also response to comments 1031-5 and 1031-6.
Colorado 500	6	11	Soils: Adding the 271 miles of motorcycle trails and rounding off, we cannot say that roads and trails disturb a maximum of 4% of the land base. The most recent cited working a USFS document was prepared by D.B. Coe and published in 2006. Coe's objective was to determine the production and delivery of sediment to forest streams via the road system, but in the course of his field work he observed, measured, and recorded another phenomena. Quoting from Page 21 of the D.B. Coe 2006 paper: "The native surface road segments that had been recently graded produced about twice as	The issue of road maintenance is not a planning issue. The roads that are regularly graded in the Moab Field Office belong to the "B" road system. All B roads are included in all of the alternatives. The majority of miles of route that are not designated between Alts. A and C are routes that have never been used by anyone. This is why they were deemed to have no purpose and need. See response to comments 1031-5 and 1031-5 for a discussion of the types of routes that were not designated. Those routes that are designated in

			much sediment per unit erosivity as the ungraded segments (p=0.02) (Figure 2.8). A pairwise comparison indicated that there was no evidence of a decline in sediment production rates between the first and second years after grading (p=0.86). Page 26 & 27, Coe 2006: "The data from four recently-graded road segments show that sediment production rates per unit precipitation were much higher in the early portion of the wet season (Figure 2.11). The high initial sediment pulse can be attributed to the rapid removal of the thick, fine dust layer that had formed on the road surface as a result of [heavy vehicle traffic]. The subsequent decline in sediment production per unit rainfall suggests that the recently-graded roads rapidly become supply limited as the road surface becomes armored and more resistant to sediment detachment and transport processes." And a review of USDA General Technical Report 193 (2004) confirms Coe's work: ungraded native surface roads consistently produced lower sediment loads than graded roads in every year that was studied. In Coe's work and in the USFS Technical Report, the results suggested that partially overgrown routes, and routes with irregular surfaces such as rocks, ledges, and roots, and lighter traffic loads, produced far less soil loss from the road surface. This research clearly indicates that reducing the mileage available for vehicle access by @50% (as all action alternatives propose) will result in soil losses that are worse, and not just a little worse. Over time, the losses will be worse by several orders of magnitude. Assuming that all traffic will be restricted to designated roads and trails regardless of the alternative used in the ROD, the proposed action in any alternative except A will result in more erosion, more road damage, and increased demands for maintenance. Increased maintenance, as the 2006 Coe study has revealed, will exacerbate the losses. In other words, concentrating traffic on few routes is a significant concern in the	the preferred alternative would be graded only if they are “B” routes. There is no maintenance performed by either Grand or San Juan counties, or by the BLM on D roads. The difference in mileage among the four alternatives is entirely made up of D routes, which will not be maintained no matter what their use. See also response to comment 208-2. Thus, although the mileage of routes designated in all action alternatives is less than the mileage that is inventoried in A, Alt. A includes all inventoried routes. Many of these inventoried routes consist of old seismic lines, pack trails (which have never been opened to motorized use, but are a line on a USGS map, and were included in the Grand County inventory) and other never-used or seldom-used routes. The commentor’s suggestion that this means that the designated routes will receive substantially more traffic than they did previously is in error. Those routes that have been used over the last two decades, and thus have demonstrated purpose and need, vary from 3,855 miles designated in Alt D to 3,328 designated in Alt B (3,693 miles are designated in C). This represents a percentage decrease of less than 5% between roads that have purpose and need and/or are regularly used (virtually all of these are included in Alt D) and those roads that are designated in the preferred alternative. That fact, and the fact that D roads are nor maintained, means that soil losses of the type mentioned by the commentor would not result from the BLM’s decision to designate 3,693 miles of full sized motorized vehicle route and 282 miles for motorcycles in the preferred alternative. See also response to comment 208-2.

			consideration of cumulative impacts.	
Colorado 500	6	12	...the MFO staff's choice to separate the citations from the body of the text makes it extremely cumbersome to review the use of the literature in this analysis. We have selected a citation that is pretty obviously aimed at roads, and because our comment is about roads, it seemed the most likely match. Please bear with us. From the Chapter in the DEIS called "References:" Forman, R.T.T. and L.E. Alexander. 1998. Roads and their major ecological effects. Annual Review of Ecology and Systematics '29:207-231. This does not have anything to do with undeveloped dirt roads and narrow trails, lightly trafficked, in a desert ecosystem. Just so you do not have to take our word for it, we have located and read the article, plus we have followed the citations in the article. None of the material we found is related to what this DEIS is analyzing. (multiple reference examples followed, text not included here)	Placing all references at the back of the document is standard operating procedure when assembling Environmental Impact Statements. The reference to the article by Foreman and Alexander is found on pg. 4-485 of the DRMP/EIS in the section on wildlife habitat fragmentation. The reference to the article concerns vehicles killing birds that are attracted to roadkills. The BLM has added an expanded discussion to Appendix G of the extensive research on the impacts of OHV use on a variety of natural resources, including soils and watersheds, vegetation, wildlife and habitat, and water and water quality . The BLM has also added an expanded discussion of the impacts of OHV use on socioeconomics, including user conflict, to Appendix G. Where appropriate, references to this section of Appendix G will be added to the relevant resource sections of Chapter 4.
Colorado 500	6	13	Please include this information in the "Environmental Consequences." Please correct the assumption that more roads will inevitably cause more invasions. What this author is saying is that more disturbance is the culprit. The greatest possible disturbance to a dirt road is grading, as it deposits loose soil on the verge, whereupon exotics transported by the vehicles can gain a foothold. If the natural road "armor" is left undisturbed, the native vegetation is fully capable of outcompeting invading exotics.	The BLM stands by its disclosure of the impacts of travel on vegetation (pg. 4-428 of the DRMP/EIS). Travel leads to disturbed soils, whether it is caused by grading, route widening, or other disturbances. Noxious weeds are spread by the disturbance of soils. Furthermore, vehicles themselves can cause the spread of noxious weeds as their seeds are transported by the vehicles. Please see response to 6-12.
Colorado 500	6	14	I would like you to correct a mistake in the Travel Plan. The mistake has its origin in the absence of an OHV Specialist on staff. Evidence that this lack of skills on staff has produced a serious omission in the Travel Plan is revealed by the following examples. 1) Ch.10 P.32: [.. Making management of this activity (OHV) more difficult…]. The fact is, recreation managers who	he adequacy of BLM staffing is not a land use planning decision. The BLM cannot find the reference to “Chapter 10, pg. 32.” There is no Chapter 10 in the DRMP/EIS. There is a reference on page 32 of Chapter 10 in the Analysis of Management Situation that lists “Issues and Concerns”.

			are experienced in motor recreation will unequivocally disagree. Motorized users are actually the easiest to manage. However, if the recreations manager has no understanding of what the motor visitors seek, it will appear that motor recreation is harder to manage. 2) Discussions like this are not even in the analysis: 'Providing sufficient quality route opportunities gives the land manager enormous control, by removing, or moving, desirable access. There are many nuances to "desirable:" destination, the difficulty level, the touring aspect of driving for pleasure, the sense of "going somewhere," and always important to every Moab visitor, the sightseeing. 3) Appendix F, page F-3 through page F-17, Tables of Activity/Experience/Benefits. These tables reveal a profound lack understanding of all motor recreation. 4) The absence (on the maps) of recreational mileage that the public has shown to MFO staff. …the MFO staff has disregarded the BLM Washington Office Technical Reference 9113-1, "Planning and Conducting Route Inventories." If MFO had an OHV specialist on staff this would be excusable. We request that in the Travel Plan, five categories of routes for RMP level management be established, and general criteria (width, surface, level of improvement) be prepared for each, as follows: 1. Commercial Routes (O&G); 2. 2WD Routes; 3. 4WD Routes; 4. ATV Routes; and 5. Motorcycle Singletrack Routes. This will qualify as a minor variation of the preferred alternative, and because it is well within the spectrum of Alternatives it is entitled to consideration under the authority of CEQ 1503.4, as explained in the 40 Questions 29b, "How must an agency respond to a comment on a draft EIS that raises a new alternative not previously considered which is a minor variation of one of the alternatives discusses in the draft EIS, but this variation was not given any consideration by the agency. The answer is,	The BLM is required to identify issues prior to working on the land use plan. Issues were listed for many types of recreation users, including river users. The BLM has recognized the need to provide route opportunities. The purpose and need of the majority of routes designated in the Travel Plan accompanying the PRMP/FEIS was recreation. This was true of each of the motorcycle singletrack routes that are designated in the Travel Plan. Routes that are highlighted on commercial maps and guidebooks were included in the Travel Plan solely to provide recreation opportunities. Appendix F provides a very brief summary of each of the Special Recreation Management Areas. Each of the SRMAs will have a Recreation Activity Management Plan (RAMP) prepared after its designation. The development of these RAMPs will allow for further explanation of the recreation resources of these areas. Technical Reference 9113-1 is a database requirement for classification. See response to comments 123-7 and 124-58. The Travel Plan has designated four categories of routes, which are shown on the maps accompanying the PRMP/FEIS. These categories are “routes” (which are opened to all types of vehicles, including motorcycles, bicycles and ATVs), ATV routes (which are opened to ATVs, motorcycles and bicycles), motorcycle routes (which are opened to motorcycles and bicycles), and bike routes (which are opened to bicycles only). There are 33,000 route segments in the Travel Plan accompanying the PRMP/FEIS. A description of each of them is not feasible. The GIS data which accompanies each of these 33,000 route segments indicates the

			in such a case, the agency should develop and evaluate the new alternative, if it is reasonable, in the final EIS. If it is qualitatively within the spectrum of alternatives that were discussed in the draft, a supplemental draft will not be needed." In fact, a new alternative is not needed; rather, a simple modification of Alternative C will satisfy the issue. This will entail only two changes to the Travel Plan: 1) GIS data revisions so that all the routes in the database are included on the maps pending site-specific analysis, and each route is attributed with the simple criteria noted above. 2) Short descriptions of each type of route will be added to the Travel Plan narrative and to the Route Selection Criteria. Including these descriptions will make it clear that the stipulations for each type of route will be very, very different than those for O&G roads. This will facilitate the post-ROD decision steps required for implementation. In the event that staff refuses to consider this minor variation, and wishes to leave the route selection criteria as it is presently written, please add the following true statement at the beginning of Page G-11, immediately prior to the discussion of route selection criteria: "Full Disclosure: Table 5 on page G-8 shows that the Moab ID Team lacks the skills to find existing motorcycle/ATV routes; and, the team's capacity to evaluate the purpose and need for recreational motorcycle, ATV, or 4-wheel-drive routes is severely constrained and impaired by the absence of a motorized recreation specialist, or any Team member who can offer serious discussion of the purpose and need for any given route or of the appropriate stipulations for each type of route.	purpose of the route. That is, those that are for motorcycles and/or ATVs are tagged in the GIS data. The Moab BLM asked for route inventories from the public. Many segments of the public provided routes, including motorcyclists and bicyclist. The BLM verified each of the routes provided on the ground. Those routes that were verified were included in the Travel Plan deliberations. Appendix G explains the process for route designation. The Moab BLM team does actually have expertise in motorized use. However, BLM staffing is not a land use planning decision.
Colorado 500	6	15	We take serious issue with this newly evolved "mission" called "MFO's benefits-based recreation management goals and objectives… for the proposed SRMAs." (page 4-190). 1. Benefits-based recreation management does not flow from the Purpose and	See response to comment 124-104. BLM policy requires field offices to consider the benefits that accrue to visitors from its decisions and actions. Benefits based recreation management does not lie outside the authority of the BLM. The BLM has incorporated benefits based

			Need. 2. Benefits-based recreation management does not flow from the NOI. 3. Benefits-based recreation management does not flow from the Scoping. 4. Benefits-based recreation management adds a burden of analysis to this RMP that lies outside the professional expertise of BLM specialists. 5. Benefits-based recreation management lies outside the authority of BLM. There is nothing in FLPMA or NEPA that requires BLM to sort visitors according to "user groups" and then expend government resources upon assuring their satisfaction. 6. In the context of applying the concept to the MFO for the purposes of making land use allocation decisions, the ID Team ahs not used any factual evidence. Professional judgment is professional because it uses a mix of an individual's professional training, peer-reviewed research, factual information from the area under study (monitoring, for example, or the Administrative Record), and their person's experience. This person's "Professional judgment" is also expected to be a) confined to that person's area of professional expertise and b) reasonably consistent with the research and factual information available in this person's area of expertise. If we do not hold government specialists to these standards, there is nothing to prevent them from simply making up management plans based on their own personal favorite activities. The narrative on page 4-190 is very sophisticated, but it looks like it was written to do exactly that. Remedy that would resolve this comment: We want BLM to abandon the entire "benefits-based" management concept.	management throughout its recreation program. "Recreation and Visitor Services (BLM): A Unified Strategy to Implement BLM's Priorities for Recreation and Visitor Services" guides BLM national policy. Washington Office Instruction Memorandum IM 2006-060, "Incorporating Benefits Based Management Within Recreation and Visitor Services Programs" directs BLM field offices to utilize benefits based recreation management in planning for recreation use on BLM lands. The purpose of this IM is given: "Purpose: This IM affirms the Bureau of Land Management's (BLM) program direction approved by the Executive Leadership Team (ELT) to adopt an expanded conceptual framework for planning and managing recreation on public lands. Strategies and policy for planning and managing recreation-tourism use is described in two key documents: "The BLM's Priorities for Recreation and Visitor Services" (see WO IB No. 2004-072) and in Sections II.C and II.D of Appendix C to the Land Use Planning (LUP) Handbook (H-1601-1, Release 1-1693, dated March 11, 2005). The BLM's recreation constituents and gateway communities have affirmed these changes are appropriate direction for the future management of recreation and visitor services at both the 2004 BLM National Recreation and 2005 Western States Tourism Policy Council forums." The Moab Field Office has been directed by BLM policy to use benefits based management.
Colorado 500	6	16	Please refer to page 4-292, 4.3.13.7 paragraph 2. Quote: "Where proposed under the alternatives, control of human waste through installation of vault toilets in high-use recreation areas generally would benefit water quality by reducing E. coli contamination and nutrient-loading of surface waters. Designation of camping	The BLM has no authority to favor one type of camping over another. BLM staff recognize that motorhomes and travel trailers have sanitation facilities. Motorhomes and travel trailers generally use routes that are maintained. All B roads, which receive regular

			areas generally would limit the surface disturbance that results from dispersed camping and unofficial fire pits and, thus, would limit adverse impacts to soils." End Quote. In another comment we requested that you revise the Affected Environment --- (specifically, 3.11.2.72.2 "INADEQUATE FACILITIES/PUBLIC HEALTH AND SAFETY The availability of facilities is directly related to public health. Inadequate numbers of organized campgrounds and restroom facilities contribute to unhealthy levels of human waste in some areas, posing a health risk to visitors.") ---and the Proposed Actions, to encourage the use of self contained motor homes and travel trailers for the specific purpose of addressing these problems in undeveloped camping areas. ...we make the following requests for revisions to the FEIS and the Proposed Actions: 1. In the analysis and in all the Proposed Actions, we want you to emphasize the sanitation advantage of self-contained travel trailers' and motor homes. 2. In the analysis, we want you to emphasize the fact that people who camp using self-contained travel trailers and motor homes do not "need" campfires, and considering their extra carrying capacity, these people are far less likely to build "unofficial firepots:" because they can bring their own firepans and firewood if BLM so requires. 4. We want this analysis to acknowledge and take into consideration that reduced access will discourage these vehicles.	maintenance, are designated in all of the action alternatives. These B roads lead to a myriad of dispersed camping opportunities for motorhome and travel trailer users. The great majority of routes that are not designated in the Travel Plan accompanying the PRMP/FEIS are routes that in such poor condition that they receive very little use (thus having no purpose and need). Neither travel trailers nor motorhomes are able to negotiate these routes, so dispersed camping opportunities have not been removed. The routes designated in the Travel Plan offer ample opportunities for dispersed camping.
Colorado 500	6	17	Please refer to Appendix F.2 Special Recreation Management Areas beginning on Page F-3. In these Tables, MFO staff attempts to compare the experience associated each activity, in order to determine a "targeted outcome" whose "benefits" will help determine the management and resource allocations for each activity. First of all, BLM has failed to establish a coherent relationship between the need to sort people this way and RMP planning.	See response to comments 123-4 and 124-104 for a discussion of Appendix F. The list of preparers includes those with advanced degrees in socioeconomics. See response to comment 6-15 for a discussion of the BLM's benefits based management recreation and visitor services policies.

			Even worse than irrelevance, however, is that in the list of preparers for this DEIS, no professional sociologist is listed. In the literature cited there is no peer-reviewed, broad-based sociological works that might give these tales at least an air of professionalism. Neither in the Appendix to this document or in the Analysis of the Management Situation are there any peer-reviewed site-specific surveys of all types of visitors to the BLM lands in MFO jurisdiction. And finally, BLM has provided no evidence -- not even evidence collected by amateurs -- that these "benefits" are not completely interchangeable between activities. Indeed, entering the arena of the psychological and personal values of the individuals who recreate on BLM lands places a significant burden upon this analysis, by widening the scope of its inquiry into an area that lies far outside the mission and expertise of the agency. If the agency should pursue this aspect of the inquiry, we want the following changes made: a) Cite the law, regulation, or Executive Order authorizing the agency to promulgate new regulations that segregate recreational visitors according to the local Moab FO staff perceptions of the value of each type of visitors' personal experience b) Provide empirical and physical evidence, in the form of a peer-reviewed field and sociological research including user surveys with peer-reviewed question formulation and accurate sample sizes for every type of public land visitor, to confirm that these emotional differences actually exist and are in fact significant enough to expend government resources on allocating land and resources based on these differences. A popular dodge for this requirement is to interview only the visitors that staff wants to interview, or only the visitors that are easy to find. We expressly demand the BLM refrain from doing this c) Provide an analysis of the social benefits (accruing to	User conflict was an issue raised repeatedly by the public during scoping, and the BLM is required to address issues raised by the public. See also response to comment 6-12. The BLM's Land Use Planning Handbook (H-1601-1) requires that "discrete Recreation Management Zones" (which are called Focus Areas in the Moab DRMP/EIS) must be delineated in each SRMA. In addition, Recreation Management Zones are extensively defined in the land use planning document. "To address these four variables within each RMZ, make the following land-use allocation decisions: 1) identify the corresponding recreation niche to be served; 2) write explicit recreation management objectives for the specific recreation opportunities to be produced and the outcomes to be attained (activities, experiences and benefits); 3) prescribe recreation setting character conditions required to produce recreation opportunities and facilitate the attainment of both recreation experiences and beneficial outcomes, as targeted above and 4) briefly describe an activity planning framework that addresses recreation management, marketing, monitoring and administrative support actions (e.g. visitor services, permits and fees, recreation concessions and appropriate use restrictions), necessary to achieve explicitly-stated recreation management objectives and setting prescriptions." (pg. 15-16 of Appendix C of the BLM Land Use Planning Manual (H-1601-1). User conflict is not merely an issue with non-motorized recreationists. There are documented user conflicts among motorized recreationists as well. Enforcement actions are not a planning decision. It is assumed that the commentor is referring to Focus Areas.

			all BLM recreationists, and to the taxpaying public) of imposing criminal penalties from crossing the regulatory boundaries that will be established to support these alleged differences d) Provide sufficient justification thereby, for agency law enforcement resources to be expended on physically sorting public land visitors with the intention of applying criminal penalties to violations of these standards, in the present and the indefinite future as this document proposes e) Provide a description of how the government will measure the success of this strategy. Alternatively, We want the BLM to abandon the concept of using individual recreationists' "values/benefits/outcomes/experience" as the basis for any management plan or any regulations or any on-the-ground boundaries.	Focus Areas do not constitute exclusive use. The focus is to manage these areas for the identified recreation use. Other users are not excluded, but their uses would not be provided for.
Colorado 500	6	18	Adaptive Management: This phrase appears frequently throughout the document. BLM plans to use "adaptive management" techniques to correct problems or make changes during the life of this plan. However, for the travel management proposals, there do not appear to be any standards for determining when management adjustments may be needed. Please add to the FEIS reasonable, predictable, and feasible standards and triggers to guide future changes that may be needed. We realize that in the context of an RMP these standards will be general, and not site-specific. But there are any number of benchmarks and/or markers that can be set in the RMP to guide site-specific situations. In other words, we want this RMP to provide a level of predictability for the business-oriented and the recreating public. The problem with setting those standards now, after the close of comment, is that we will have no public review	A decision under Travel Management (pg. 2-48 of the DRMP/EIS allows additions to the Travel Plan (using NEPA analysis) as travel needs are identified. The purpose and need for a proposed new route would be provided in the Environmental Assessment prepared to add the route to the system. Public review is provided for each Environmental Assessment written by the BLM. That is, each proposed new route to be added to the Travel Plan will undergo the NEPA process, including public review. The public may comment on each new travel plan proposal. The need for adding a specific route to the Travel Plan after completion of the land use planning process is a site-specific item and cannot be specified in advance in the land use plan.

			of the standards. Therefore, we request that BLM prepare those standards and offer a separate review period in order to provide for that legal necessity.	
Colorado 500	6	19	Please refer to Chapter 3, 3.11.1.2.16 in DEIS: Quote [There are no routes solely dedicated to OHV use. These activities take place on the same routes as used by four-wheel drive vehicles, and often occur on Jeep Safari routes. There is an informal, user-made network of motorcycle routes in the White Wash Dunes Ares.] end quote The total exclusion in the 2007 DEIS of a type of OHV route called "motorcycle trails" is a radical change, inserted by staff after the close of scoping. Furthermore, there was absolutely nothing, general or specific, in the Notice of Intent published 6/4/2003 that could be perceived to even imply that recreational routes called "motorcycle trails" would be eliminated from consideration in this RMP and Travel Plan. 3.11.1.2.16 contradicts several statements in this EIS that explicitly describe the presence of "casual systems" of motorcycle trails (as in the quote above.) 3.11.1.2.16 contradicts with the data provided in the original Alternative A that was on the website prior to the issuance of the DEIS. That document listed 271 miles of motorcycle trails. 3.11.1.2.16 contradicts Page 3-84. "It is important to note that the majority of OHV and dirt bike users in the MPA are residents of Colorado." A detail reference in the original scoping was omitted: "dirt bikers" come from Colorado to ride single-track OHV trails. They do not come to ride on roads. 3.11.1.2.16 contradicts the published BLM map #2-11E "Designated Motorcycle Routes Alternative C and D," now withdrawn from public review. 3.11.1.2.16 contradicts the tiny, scattered mileage shown on the DEIS Alternative C map 2-11-E called "Designated Motorcycle Trails." According to that map	Chapter 3 of the DRMP/EIS describes the actual situation when the plan is under preparation. There are currently no routes in the Moab Field Office that are designated for ATV or dirt bike use under previous planning efforts (four wheel drive vehicles are also considered OHVs). The BLM acknowledges that there are user-made routes that ATV drivers and dirt bike riders have made on their own. These routes, however, have never been designated for any particular use; they have not been limited to any one use, nor have they been sanctioned by the BLM. The new land use plan under preparation seeks to remedy this by designating routes specifically for ATV and/or dirt bike use. These routes are identified on Map 2-11-E; hose routes that are in the preferred alternative would be designated at the time of the ROD. It should be noted that they would be designated without any further environmental analysis. This RMP/EIS is the environmental analysis for these routes. Two hundred and eighty two miles of motorcycle route are designated in Alt C of the DRMP/EIS. The BLM fails to understand how “motorcycle trails” have been excluded from the planning process. On November 1, 2003, the Moab BLM issued a “Request for Route Data” planning bulletin. This bulletin, which asked the public to submit information on all types of motorized routes, was posted on the Moab internet page, and was sent to every interested party in the RMP process. The majority of the motorcycle trail data was obtained by the BLM as a result of this data call. The BLM has not eliminated motorcycle trails from consideration in the RMP or the Travel Plan.

			there is some sort of "dedicated OHV trail." But 3.11.1.2.16 says there are "no routes solely dedicated to OHV use."	The figure of 271 miles of motorcycle trail in Alt. A was an estimate of existing motorcycle trails in the No Action alternative. This numerical estimate was provided to provide a baseline comparison for Chapter 4. The motorcycle trails in the existing condition were entirely user made. Dirt bikers from Colorado may very well come to Utah to ride the user-made network of motorcycle routes. The Travel Plan accompanying the DRMP/EIS attempts to systematize this user-made network and designate those routes that do not cause unacceptable resource damage. See Appendix G for a description of the Travel Plan process. See also response to comment 124-71. Many dirt bikers do ride on roads in the Moab Field Office. Many of the “roads” in the Moab Field Office present a challenge to any dirt bike rider. Chapter 3 describes the current Affected Environment. There are no routes solely dedicated to dirt bike or ATV use currently. Map 2-11-E is a depiction of routes that would be designated for motorcycles under the action alternatives of the DRMP/EIS. Thus, this land use planning effort does provide for motorcycle users.
Colorado 500	6	20	We dislike using the expression, but the dishonesty of the MFO staff inserting "popular mountain bicycle" trails in place of motorcycle trails is exposed by: 1) The placement of a "Mountain Bike Focus Area" (Map 2-9-C) exactly where the popular Copper Ridge motorcycle trail already is. This is an existing singletrack loop, plus singleback connectors to the Sovereign Trails system (state land) and an existing single-track connector to Thompson Springs. 2) The record supporting this analysis: refer to the "Comments" section, quote, "Keep it (lands) open to mountain bikers and motorbikes. We are mountain bikers and appreciate the motorcyclists who discovered	1. As stated explicitly in the DRMP/EIS. Focus areas are not designed to exclude other uses, such as the single-track motorcycle trail cited by the commentor. Klondike Bluffs is a mountain bike focus area because the predominant use of Klondike Bluffs is mountain bike use. The Copper Ridge motorcycle trail was submitted to the BLM during scoping; the route could not be verified on the ground. This means that it was not popular enough to be evident on the ground. See also response to comment 122-36. 2. The BLM acknowledges the comment cited by the commentor, but fails to see its relevance to the issue at

			it. Everyone that we met on the trail was respectful to us and as far as we could see, the environment too (Slickrock Trail Parking Lot, Comment Cruiser Comments, 11 October 2003). This comment is especially important because it does not originate from the "self-selected" commenter's who attended meetings or wrote letters.*** 3) The 1985 Grand RMP.(LISTS passages form the 1985 Grand RMP) Requests that will resolve this comment: 1. We want BLM to provide the analysis that supports the statement "There are no routes solely dedicated to OHV use." Reprinting the same sentence from the AMS will not satisfy this request, as there is no analysis in the AMS that supports BLM's claim in 3.11.1.2.16. This additional analysis will obviously include maps of every existing road and trail. This analysis must detail who made each route, for what purpose, and when it was made. To accomplish this, interviews with residents of the Moab area, as well as residents of western Colorado and western Utah will be necessary, and interviews with motorcycle clubs and businesses, to gather the factual evidence that supports (or refutes) the claim that off-road motorcycles do not have their own dedicated system of routes in the MPA and in the MFO jurisdiction. 2. We want a third-party, non partisan review of this analysis. The reason that is necessary is that many private citizens donated hundreds of hours to help BLM map the single-track OHV routes in the run-up to this DEIS. Hundreds of miles of motorcycle trails were mapped. Since BLM has no compunctions about discarding that work, we have no reason to trust BLM in the conduct of any new route inventory or route development history. 3. Reprinting the same sentence from the AMS will not satisfy this request, because there is no analysis in that	hand. 3. The sentence referred to by the commentor from the 1985 Grand RMP is simply a statement by the BLM that there are no trails managed solely for OHV use, which is the case in the No Action alternative. No amount of research or interviews or third-party analysis will change this fact from the 1985 Grand RMP. The commentor provides no evidence to suggest otherwise. The fact that user groups may have their own trail systems does not mean that the BLM manages these for that single use. Additionally, no user group has the self-appointed authority to manage trails on public lands for their exclusive use. 4. The BLM, as part of its scoping for the land use planning process, requested route information from the public. A result of this request, the BLM received several hundred miles of routes from the public, including numerous motorcycle routes. Most, but not all, of these routes were verified on the ground by the BLM and were included in one or more action alternatives for analysis. This process is described in detail in Appendix G of the DRMP/EIS. These include many (perhaps most, but the BLM is not familiar with each group's route naming system) of the routes presented by the commentor. Some of the routes mentioned by the commentor were not presented to the BLM during scoping, and were therefore not included in the travel plan process. The BLM is not in a position to forego travel planning indefinitely to accommodate new route proposals. As the DRMP/EIS explicitly states, new routes can be considered for inclusion in the travel plan on a site-specific basis in the future. See also response to comments 122-15 and 122-30. It is worth noting that several of the routes proposed by

			document that supports BLM's claim in 3.11.1.2.16. 4. If there is no such analysis, we want BLM to add this statement to 3.11.1.2.16: "MFO staff has elected to omit at least 200 miles of existing motorcycle singletrack trails form the inventory and to eliminate form consideration the designation of a "system" of existing singletrack OHV trails in Alternative C. Staff has chosen to remove this data in advance of the Deciding Offer's review and Decision. Staff realizes that this will prevent the Deciding Officer any opportunity to evaluate and designate singletrack OHV systems. Based on the record supporting this DEIS and Plan, it will likely be perceived as a pre-emptive Decision by the ID Team. There is no analysis that supports this action. There is ample evidence that these routes do exists, as many members of the public assisted in located and mapping them. However, MFO staff has elected to discard that data. Please refer to 3.11.1.2.16." Alternatively, and less contentious and less time consuming, and more likely to get this project to a Decision in a more timely way, we want eh Moab BLM to restore the trails in the MFO database that were collected under the public perception that the trails would be called "motorcycle singletrack" and included in the travel plan for consideration. We will not try to guess at the name BLM has assigned these trails. Restoring these trails to the database will simplify completion of the RMP, and it would fill several glaring voids in the "Travel Plan." Then, in the post-ROD implementation, site-specific monitoring would support the eventual site specific analysis of the impacts of these trails. We also request that BLM add the following section to Chapter 3: 1. Beginning on page 3-79, part 3.11.1.2.16 must be changed to "Popular Motorcycle Routes." These will be	the commentor are located in an area limited to existing trails as of 1985. The commentor needs to be aware that on pg. 2-32 of the DRMP/EIS, it is stated: “No additional OHV routes would be allowed in saline soils other than those already designated in the Travel Plan”. The Slickrock Bike Trail has been added to the motorcycle trail route map (2-11-E). The following routes mentioned by the commentor are open to all motorized vehicles, including motorcycles: Gemini Bridges, Amasa Back, Flat Pass, Klondike Bluffs, Kokopelli’s Trail, Poison Spider, Bartlett Wash, Moab Rim, Kane Creek Canyon Rim, Hurrah Pass and Onion Creek. The commentor should consult the motorcycle trail map (2-11-E) to see if the routes he names are available to motorcycles. The BLM is unfamiliar with some of the names used by the commentor. The Mel's Loop route has been placed in the proposed alternative for the PRMP/FEIS.

			the same as the "popular bicycle" trails, plus many more miles. The reason they are the same is, BLM changed the usage for this DEIS even though (because it is in the record) BLM cannot dispute the fact that motorcycles were suing those trails when the 1985 RMP was written. 2. We want BLM to include Gemini Bridges, Porcupine Rim, the Slickrock Bike trail, Amasa Back, Flat Pass, Klondike Bluffs, Kokpelli's Trails, Poison Spider, Lower Monitor and Merrimac, Bartlett Wash, Moab Rim, Kane Creek Canyon Rim, Bar M, Hurray Pass and Onion Creek ("popular bicycle trails), 3. And, add trails including but not limited to: 4. Copper Ridge Singletrack 5. Thompson Wash Singletrack 6. Guy's Trail Singletrack 7. Enduro Trail Singletrack 8. Bitter Creek Singletrack 9. Beyond Bitter Creek Singletrack 10. Thompson Trail Singletrack 11. Western Rim Singletrack 12. Zion Curtain Singletrack 13. Westwater Rim Singletrack 14. Mel's Loop Single-track 15. Mel's Westwater Connector Singletrack 16. Prairie Canyon Singletrack 17. Dubinky Singletrack 18. Whitewash Singletrack system 19 Ten Mile Wash Singletrack system These trails are part of the database that a trusting public helped MFO staff to assemble, with the hope of an accurate analysis. It is not our intention to stop BLM's progress toward a Decision, and it is not our intention to "torpedo" Alternative C as the preferred. It is our intention to encourage the government to produce accurate planning documents that truly reflect the conditions in	

			front of the Planning Team. That is why in each of our comments, and especially this comment, we offer a solution that BLM can achieve in the FEIS.	
Colorado 500	6	21	...the published Final Scoping Summary has aroused suspicion. …in approximately 750 to 1,000 comments in support of "OHV," the word motorcycle appears just once and "motorcycles" only twice, although "dirt bikes" and "motorbikes" slipped through someone's word search. Yet off-road motorcyclists never refer to themselves as OHV or ORV users, and never refer to their trails as "OHV trails." They refer to their trails as "singletrack." For example, the Bookcliff Rattlers Motorcycle Club does not call itself the Bookcliff Rattlers OHV Club. This is a universal trend; a Google search of "OHV" clubs will turn up none who use that acronym in their club name. And we noticed something odd in the comments as published in the BLM AMS "Summary of Public Comment Final." Relying on BLM interpretation, as we do not have access to original material, we note here for the record, the following: "OHV" appears 257 times and "ORV" appears 25 times. "Dirt bike" never appears. "Dirt bike" appears once. "Motorcycle" appears once in the name of the club, and "motorcycles" appears twice. And for some strange reason, there is not one occurrence of the word "singletrack" in the scoping record, either, and "single track" appears only once, in spite of the fact that for both motorcyclists and mountain biers, singletrack is the most prized type of trail. Because this makes us suspicious that the scoping comments may have been "interpreted" we will briefly examine the published scoping comments that mention "Trails, OHV, and Recreation." We present this as additional evidence that both motorized users and	The BLM received scoping comments from the Bookcliff Rattlers Motorcycle Club. Many of their inventoried routes were verified by BLM and are included in the Travel Plan. The BLM summarized the scoping comments that it received from the public. All these comments are publicly available and the commentor is welcome to look at them at any time. The BLM has included singletrack routes in the Travel Plan accompanying the DRMP/EIS. The BLM called for these routes to be submitted to the agency during the scoping process. The BLM verified each of the submitted routes on the ground and analyzed each for resource conflicts. The BLM has designated 282 miles of motorcycle route in the preferred alternative of the DRMP/EIS. The BLM considered all scoping comments received from the public. These comments are publicly available for inspection. It should be noted that a Scoping Meeting for the Moab RMP was held in Grand Junction, Colorado on October 14, 2005. Fourteen people were in attendance, including members of the Book Cliff Rattlers Motorcycle Club.

			nonmotorized users do recognize a specific type of one-track trail that is used only by motorcyclists. This is the record that staff will present to the Deciding Officer in the FEIS. Thus, for staff to truncate the results in such a way that an entire type of very popular and economically positive recreation (which has thousands of clubs, organized events, and is recognized worldwide), is concealed, is a serious issue for the public.	
Colorado 500	6	22	We are particularly concerned about Moab BLM's motorized recreation strategy, because there is not a single OHV management information source in the DEIS list of citations. In light of the mandate that the BLM use the "best available information" for its analysis this is a serious omission. It clearly appears as though MFO staff is not measuring their assumptions, strategies and predicted environmental consequences according to currently accepted resource management standards and research. BLM has split the list of references from the body of the text, so the utility of every site is impaired, and we don't have the time to identify how many are actually needed to support this document. The following samples are intended as evidence to support our requests. Examples of relevant research that is omitted (PLEASE SEE LETTER): Examples of apparently irrelevant citations (PLEASE SEE LETTER): We request seven changes: 1. We want professional recreation management literature included and utilized in the guidance of the travel plan development and the designation of recreational routes. 2. We want the citations to be joined with the relevant text, in order that the discussions and analysis in the DEIS be supported and guided by the existing research	The Travel Plan process is described in full in Appendix G of the DRMP/EIS. The BLM worked with county cooperators to designate routes in all three action alternatives. Designation or non-designation was based not on literature, but on on-the-ground resource conflicts that may or may not have been present along the route. For instance, the Hidden Canyon Rim was not designated for motorcycles or bicycles because of the prevalence of cultural resources. The Travel Plan was developed on a site specific basis, with each of 33,000 road segments examined individually. Professional recreation management literature concerns the management of the routes, once designated. The criteria for designation or non-designation are not found in literature, but rather in the on-the-ground conditions of each of the routes. Citations are commonly listed at the end of EIS. The references in the text refer to documents listed under “References”. The BLM utilized the BLM National OHV Strategy throughout the document. The BLM considered all verified routes proposed by the public during scoping. These routes were analyzed on a route by route basis. There is no literature that relates to each of these routes. The Travel Plan was not formulated as an academic exercise,

			and guidelines and to enable the public to check them. 3. We want motorized recreation management to be guided by the current nationally recognized OHV professions, using standard OHV management strategies. 4. More specifically, we want the MFO to use standard recreation management protocols to formulate the Travel plan and Alternatives, and we want the Environmental Consequences re-analyzed where the proposed actions in the DEIS conflict with that literature that has been developed by nationally recognized experts in OHV management. 5. In the absence of supporting literature and in the absence of the actual presence of impacts to any wildlife species, we want all restrictions on OHV (based on that species) removed from consideration. We want confirmation of the actual presence of the species, and not the "potential" for the species, to guide the designation of all OHV trails. 6. We want the obvious fact that the presence of any species cannot possibly precede the presence of motorized recreation prominently acknowledged (unless the species of concern as a life span of more than 30 years). 7. We want the potential for all river recreation impacts on the natural resource analyzed, and restrictions proposed as needed to protect riparian resources.	but rather on a site-specific basis. There were very few routes not designated due to the presence of wildlife. Those few that were not designated were because of the presence of bighorn sheep. The Moab BLM has extensive radio collar studies of the bighorn herds in the planning area. These data are available upon request. Although motorized recreation has occurred throughout the planning area for the past 30 years, the Moab DRMP/EIS anticipates increased motorized use. Travel planning considers this possible increased use. The river recreationists utilizing the Moab planning area are currently under strict restrictions. These restrictions are carried forward in the DRMP/EIS. Westwater river users are restricted to 75 private users per day and 75 commercial users per day, There are no more than 5 private launches and 4 commercial launches per day. There is also a yearly limit on the numbers of boaters. Campsites are strictly regulated and are assigned at the put-in. The Moab BLM river program's requirements limit riparian impacts. These impacts are disclosed on p. 4-245 – 246 in the DRMP/EIS. See response to comment 6-12.
Colorado 500	6	23	We have four specific requests regarding the re-do of the analysis when BLM gives up pretending that these singletrack OHV trails do not exist: 1. Please add all OHV singletrack submitted by the public, both individuals and organizations, and those individuals who personally assisted BLM in finding the OHV singletrack trails, to the DEIS inventory. 2. Please provide peer-reviewed evidence that they represent or could sometime in the future represent an irretrievable loss, keeping front and foremost in the	All the OHV singletrack submitted by the public was considered. Each route submitted was verified on the ground by BLM staff and some of them were also verified by Grand County personnel. These routes are in the BLM's administrative record and are publicly available to the commentor. As described in Appendix G, those singletrack routes that did not pose unacceptable resource conflicts were placed in Alts C and/or D of the DRMP/EIS. See Appendix G of the DRMP/EIS and the administrative record accompanying the Travel Plan.

			analysis the fact that MFO staff has suggested those trails have grown over and/or staff could not find them. 3. In the event no such evidence is uncovered please revise the Affected Environment so that it is consistent with the new information, and consistent with staff statements about indiscernible trails and/or the trails disappearing both on the ground and in aerial photos. 4. Please designate these singletrack trails as motorized OHV singletrack trails, after following the above steps, in the ROD. We realize that this will require reworking some of the SRMA's. We appreciate your work on this request.	Where BLM staff could not find an inventoried trail, they were assisted by county personnel. Thus, more than one individual attempted to find the trails in question. Motorcyclists were asked about unfound routes and stated that they “never went the same way twice”. Not following a specified route constitutes cross country travel and not trail or route travel. The BLM has provided an entire Focus Area for Motorized singletrack (Dee Pass), an SRMA for motorized trails (Utah Rims) and an SRMA for ATVs (Cameo Cliffs). See also response to comment 6-12.
Colorado 500	6	24	Please refer to 3.11.2.5 User Conflict Displacement Quotation: "Another source of tension is among various recreation user groups. When recreational use reaches a certain threshold, user groups start to resent the multi-use nature of public lands. For example, ...Poison Spider Trail - conflict between OHVs and mountain bikers"] end of quote Please provide a peer-reviewed analysis which support the implication of "OHV" as the origin of 100% (one hundred percent) of the conflict cited above. If there is none, please add in a prominent position in the discussion on page 3-86 the following statement: "MFO has no data or peer-reviewed analysis supporting any of the above statements." The MFO staff analysis is omitting from his investigation the defining study in this field, "Conflicts on Multiple-Use Trails." (Moore 1995). It comprises a thorough synthesis of the literature in the sociological field that examines the exact type of conflicts the MFO staff is concerned about. In order to address the core issue that is identified as the source of almost every problem cited in 3.11.2.6, 3.11.2.7.1, the solution is to offer more opportunity, not less. If is the frequency of the	The mountain bike community has been vocal during scoping that it is being displaced by increases in motorized use along shared trails. This is evident in scoping comments as well as in comments on the DRMP/EIS. Thus, the issue raised during scoping of “user conflict” was not as a basis of research, but rather a specific issue raised by users of the Moab public lands. The articles by R.L. Moore on user conflicts concern crowding on urban, paved bike paths. Moore does not dismiss user conflict, but rather offers urban planners management suggestions to alleviate user conflict. The BLM has provided 30 Focus Areas and 10 SRMAs to provide recreation opportunities. The BLM has increased recreation opportunities. If the commentor is referring to the roads designated in Alt C, he can be assured that the great majority of recreationally utilized routes have been included in Alt C. Law enforcement is not a planning issue. See response to comment 6-12.

			encounters, not the type, that elicit the greatest number of dis-satisfied visitor responses. Adding well-designed trail mileage will attack the problem at its source. If the MFO staff chooses to ignore the standard and most accessible research in the field, please provide the analysis and peer-reviewed literature that staff is relying upon that shows that reducing recreation opportunities will resolve the above cited problems. If there is none, please add the following in the Executive Summary and in the Environmental Consequences assumptions: "There is no peer-reviewed research that sets forth the recreation management concept that a reduction of opportunity will resolve the user conflicts cited in this analysis." Please cite the legal authority that mandates imposing criminal penalties upon any lawful activity in the total absence of any sociological, physical, or scientific evidence that such criminalization is a worthwhile and constructive management strategy. If there is none, please add to the Executive Summary and in the Alternatives the following true statement: BLM does not have any evidence to support the concept that criminalizing a lawful activity is a worthwhile and constructive management strategy.	
Colorado 500	6	25	Quote form Page 11-20 [To date, only half of the allotments have implemented the livestock adjustments identified in the 1985 Grand RMP through agreements with the livestock operator or by monitoring adjustments (Appendix D, page A-29). ...Table 11-2 identifies issues by selected steams that are currently receiving restoration or focus.] End Quote Request to correct a significant omission: Based on the above quotes: ...grazing, a significantly surface disturbing and riparian disturbing activity, occupies 66 percent of the MFO landbase. Off-Highway Vehicle use, and specifically motorcycle use, is permitted on existing roads and trails and in one	Grazing is permitted under the Taylor Grazing Act. Grazing is a permitted activity, governed by the Standards for Rangeland Health and Guidelines for Grazing Management. These standards guide season of use and stocking decisions. That is, livestock are permitted in certain numbers and at certain times. The RMP makes the decision as to which allotments are available or unavailable for grazing. Travel by the general public on designated routes is governed by the Travel Plan accompanying the RMP. In areas limited to designated routes, all travel would be allowed only on roads designated in this plan.

			open area, with intermittent off-road and cross country travel. The MFO supplies no data on acreage affected. This is a significant omission, given that one of the primary concerns of the MFO staff is the perceived negative effects of motorcycle use upon soil and vegetation and the MFO staff insistence upon including singletrack OHV effects on the soil and vegetation with the effects of grazing on the soil and vegetation. This concern is so hysterical that MFO has apparently elected to eliminate 90% of the singletrack OHV opportunity in the planning area. However, before the government disrupts the social and economic structures of a community, government is supposed to use the "best available" information. That information is readily available, but it has been omitted from this analysis. Therefore, we will provide the information in this comment with the express request that it be used in the EIS. ** (This figure is from the AMS, which has been taken off the website. The removal of several key data components of the AMS before is re-used as the "Affected Environment" in this DEIS is the subject of another comment.	Miles of singletrack route have been provided in the DRMP/EIS. All singletrack routes proposed during scoping were verified and analyzed (see Appendix G for a description of the travel planning process.) The great majority of the routes proposed were in fact designated in the DRMP/EIS. The BLM expended much effort in designating single tracks and has no agenda to eliminate them. Cross country travel by cows, horses or hikers is not regulated by the land use plan. Cross country travel by motorized and mechanized vehicles is regulated by the land use plan.
Colorado 500	6	26	Request to add field research that is absent from this analysis. Riparian/ ephemeral/ dry washes In the study that examined erosion during weather events, in every sample over a 3-year program, the amount of soil loss into the live waterway from the trail was always below the EPA standard for nonpoint pollution sources and with a single exception, the samples were far below the EPA standard. In the one exception, one sample from a three year program approached the limit but did not exceed it.	Unrestricted travel in wash bottoms results in resource impacts as judged by BLM staff specialists. Concerns include destabilization of banks, accelerated erosion and use of wash bottoms by wildlife as travel corridors. In addition, observations indicate that some users do not remain in the wash bottoms, but leave them to return to the main travel routes. This results in cross country travel. See response to comment 6-12 for a summary of research regarding this issue.
Colorado 500	6	27	Request to rewrite inaccurate portions of the document ...we request that in this Planning document, references which place OHV activity in the same class of disturbance and impacts as grazing as well as other	The DRMP/EIS analyzes the impacts of each resource on every other resource so that the decision maker has full information. Please see response to comment 6-12.

			landscape scale impacts such as fire and flood, be removed. We want all references to singletrack OHV to be rewritten according to the actual surface impacts. The discussion above would suffice to enlighten any disinterested reader to the extent of the difference between these activities and we request that the MFO staff use it verbatim.	
Colorado 500	6	28	Request to add information: We formally request that the following five steps be taken to correct this gross omission and resulting inaccuracy: a) the acreage of motorcycle-disturbed soil be calculated and included in the data provided in this analysis; b) the discussion of the nature of the acreage (linear, and lightly used due to extensive mileage) be included in the recreation/OHV section of the AMS; c) the two dedicated OHV-stream intersection field studies be included and utilized in the Affected Environment chapter, and the Environmental Consequences revised so it is consistent with this new information; d) the acreage of cattle-disturbed soil be calculated and provided in this analysis; e) The level of agency resources (by percentage) devoted to ensuring compliance with the agency's own agreements, policy, and regulation for grazing vs. motorcycle use, is provided in this analysis. With this information, the Deciding Officer will be able to compare the actual effects upon the natural resources of different activities, and by understanding the existing situation more accurately, select more appropriate actions for the Final Decision.	The BLM lacks data of the specificity requested by the commentor. The linear miles of motorcycle routes are provided as the basis of the analysis. There is no suggestion that the disturbed soil is beyond the width of the motorcycle route. That is, no miles of singletrack motorcycle route are provided in Alt. B. Thus, Alt B assumes no impacts from motorcycles. The comparison among alternatives is based on linear miles of route, with Alt. B being the least impacting, and Alt. D being the most impacting. See response to comment 6-12 for the addition of research regarding the impacts of OHVs on public lands. The commentor is also referred to “Environmental Effects of Off-Highway Vehicles on Bureau of Land Management Lands: A Literature Synthesis, Annotated Bibliographies, Extensive Bibliographies, and Internet Resources (U.S. Geological Survey, 2007). Law enforcement is not a land use planning issue. Grazing and off highway vehicle use are governed by separate laws, regulations and policies.
Colorado 500	6	29	We have reviewed the citations in the "References" chapter and there is not a single one which provides professional field research to indicate or even imply that trail-based OHV recreation has any measurable	See response to comment 6-12. The following summary of studies has been added to the Travel Plan Appendix G, and is referred to in the analysis:

			negative effects. In fact, we did not find one that even mentioned "OHV" at all. In other words, it appear to be the case that there is no science informing the analysis supporting the road closures and OHV recreation curtailments proposed in all of the action alternatives. Our revisions: 1. We want all the roads and trails proposed for closure be designated open, along with the present proposals. The reason is, this analysis has uncovered no evidence to implicate trail-based OHV recreation in any negative natural resource results. 2. After the ROD is settled, if any road or trail may potentially cause resource damage we want independent field monitoring programs instituted, with public review.	"Environmental Effects of off-Highway Vehicles on Bureau of Land Management Lands: A Literature Synthesis, Annotated Bibliographies, Extensive Bibliographies, and Internet Resources" (U.S. Geological Survey, 2007). Routes not designated in the preferred alternative will not be available for travel after the Record of Decision is signed. For the most part, these 2,506 miles of route had no discernible purpose and need, including the purpose of recreational use. For additions of routes to the Travel Plan, see response to comments 122-15 and 122-30. See the above cited study for evidence of OHV effects on natural resources.
Colorado 500	6	30	We request that you remove "OHV" from any discussion that implies that OHV has the same impacts on the natural environment as landscape-scale events such as fires, floods, windstorms, drought, livestock grazing, and vegetation treatments. The reason is, this analysis has uncovered no evidence to support that OHV has effects on that scale. Our point here is threefold (PLEASE SEE LETTER FOR SPECIFIC REFERENCES DISCUSSED): A. Trail based recreation is not present in any of these discussions (no surprise; the present acreage of MFO lands classified as erodible and accessed by OHV is absolutely minute, as previously noted). B. According to this RMP, BLM has implemented none of the methods listed to determine what if any sediment loads are delivered to waterways from activities on BLM lands. C. At this time, if BLM is receiving reports of NPS pollution from BLM lands it is the height of irresponsibility for BLM to remain silent on the subject in this RMP, and even worse, to fail to institute any program based on the priorities and research in the	Please see response to comment 6-12. See also "Environmental Effects of Off-Highway Vehicles on Bureau of Land Management Lands: A Literature Synthesis, Annotated Bibliographies, Extensive Bibliographies, and Internet Resources", compiled by the U.S. Geological Survey in 2007. Information from this ompilation of studies has been added to the PRMP/FEIS.

			Utah Plan, to reduce the NPS problem. Since we are quite sure that BLM would never intentionally conceal this information, we can safely assume that the grazing and mining and the present level of recreation management is adequately managed by MFO, and downstream problems have been successfully prevented. And finally, the single cite provided in this RMP on the activity itself: Stokowski, P. A., and C. LaPointe. 2000. Environmental and Social Effects of ATVs and ORVs: An Annotated Bibliography and Research Assessment. School of Natural Resources, University of Vermont, Burlington. Abstract: This report provides an annotated bibliography of published research related to the environmental and social effects of ATVs on public and private lands. Citations were gathered in a literature review of published research reports and peer-reviewed scholarly writing, and from a review of internet sources. Key findings from the research are synthesized and evaluated, and suggestions for future research are provided. The reference that MFO resource specialists accessed for their information on "ORV's and "ATV's" is a list of other research. Whether that other research is relevant to proposed MFO management actions is unknown. Whether any of the research listed provides monitoring results, or whether the research is peer-reviewed, or whether it is even research, or whether there is any original field research such as monitoring at specific sites to verify or refute hypotheses, is unknown, because the MFO specialists only used the list. According to the references cited in the RMP, no specialist retrieved and used any of the actual research itself. So the answer to our original inquiry about the science that informs the Moab RMP and Travel Plan proposals	

			is that, there does not appear to be any. No monitoring; no original, peer-reviewed research; no sociological research. This makes the relentless references to "resource damage caused by OHV" not credible.	
ECOS Consulting	9	1	The Moab RMP/EIS doesn't to adequately address indirect impacts and their cumulative effects. BLM's conclusions regarding potential impacts were presented without supporting scientific analysis or rationale, and as such, appear arbitrary and unfounded. Soley listing acreage directly impacted by various uses is not adequate for proper environmental impact analysis.	See response to comment 124-7.
ECOS Consulting	9	2	#2-page 5. When there is nearby surface disturbance, the proposed BLM buffer of "100 meters" is inadequate in this dry desert environment, because of the ease of the spread of soil distrubance and erosion, vegetation loss, and soil and water contamination that can spread into the floodplain and riparian habitat. These direct, indirect, and cumulative impacts can be effectively reduced by increasing the buffer to 1500 meters.	The 100 meter buffer is based on Utah State Office Instruction Memorandum UT 2005-091 regarding Utah Riparian Management Policy.
ECOS Consulting	9	3	The alternatives in the Moab RMP show very little difference in range regarding how much actual grazing wil be permitted. The present Alternative range of allowing livestock grazing on 91.5% (Alternative A) to 97% (Alternative D) is unacceptable.	The land use planning decision for livestock grazing involves identifying the areas that are available or not available for grazing. There is a narrow range in the alternatives for livestock grazing because the entire area is considered chiefly valuable for livestock grazing. Therefore, only areas with known major resource conflicts were considered for not grazing during the life of the land use plan. All other resource concerns involving livestock grazing are evaluated on a site specific allotment basis during permit renewal utilizing the Standards for Rangeland Health and Guidelines for Grazing Management. See also Chapter 2, which details the grazing alternatives considered but dismissed from further analysis. The MFO is actively monitoring allotments and assessing if the RHS are being met. Allotments found not to be meeting are evaluated and changes made to the grazing

				permit that will move the allotment or watershed towards meeting Standards. This is an implementation phase of the current RMP and will continue in this RMP as proposed. It is BLM policy to monitor existing livestock use levels, forage utilization, and the trend of resource condition and make necessary adjustments on an allotment or watershed basis. These actions are activity-based actions and are part of the implementation of an RMP to assure that Rangeland Health Standards are met, as well the other objectives of the RMP. Regulations at 43 CFR 4130.3 require that the terms and conditions under which livestock are authorized “ensure conformance with the provisions of subpart 4180,” the Standards for Rangeland Health and further 43 CFR 4130.3-1 require that “livestock grazing use shall not exceed the livestock carrying capacity of the allotment”. It would be inappropriate and unfeasible to estimate variable levels of livestock and wildlife use and determine what specific changes to livestock and wildlife numbers and management are appropriate at the RMP planning level. Such changes would not be supportable and need to be made by considering the monitoring data on a site-specific basis. The BLM policy directs that monitoring and inventory data be evaluated on a periodic basis and that change to livestock numbers and management be made through a proposed decision under 43 CFR 4160. These implementation level decisions will be in conformance with the Goals and Objectives of the applicable RMP, and must protect and enhance the conditions and uses of the BLM lands. The state of Utah monitors water quality and coordinates and cooperates with BLM to conduct water quality testing. When Standard #4 (water quality) is not meet and

				livestock management is found to be a significant contributing factor changes will be made to the affected grazing permits to make progress towards meeting this Standard. At this time no water quality testing has failed to meet Standard." See allotments map 2-4.
ECOS Consulting	9	4	Table 4.73 on page 4-245 indicates that Alternatives B, C, and D…Hell Roaring Canyon. …The BLM should state clearly and unequivocally that "limited" means that OHV use will merely be limited to designated routes within riparian areas, that OHV use will not be precluded from riparian areas, and that such OHV use will adversely affect the riparian areas. In fact, the limited category does, indeed, have routes in riparian areas-i.e. Tenmile Canyon, White Wash, and Hell Roaring Canyon. The BLM should state clearly and unequivocally that "limited" mean that OHV use will mere be limited to designated routes within riparian areas, that OHV use will not be precluded from riparian areas, and that such OHV use will adversely affect the riparian areas.	Table 4.73 shows the acreage of riprian area by OHV designation. The table does not indicate that there are no routes in riparian areas. The BLM acknowledges that some routes are designated within riparian areas. The definition of limited routes is found on pg. X-35 of the DRMP/EIS. On pg. G-24 of the Travel Plan it is acknowledged that the use of routes located in riparian areas can contribute to loss of riparian vegetation, degrade stream banks, and lead to erosion problems. Hell Roaring canyon has a total of 5 riparian acres.
ECOS Consulting	9	5	The DRMP should also address future relocation and closure due to deteriorating riparian conditions and deteriorating route conditions due to continuous wear and tear and storm events.	On pg. 2-48 of the DRMP/EIS it states that "Where the authorized officer determines that off-road vehicles are causing or will cause considerable adverse affects, the authorized officer shall close or restrict such areas".
ECOS Consulting	9	6	Riparian Section 9.3.3 on Page G-24 of the Moab RMP states that there are OHV routes in a total of 118.9 miles of riparian area, and 230.2 miles within floodplain areas, but there are no maps or lists of which riparian or floodplain areas. Have the conditions in these riparian areas been monitored? If so, by whom, and are there	The riparian conflict is identified on a route by route basis for about 33,000 routes in the attribute table for the GIS database. This data are part of the administrative record and are available to the public upon request. A monitoring plan will be developed upon completion of

			any reports with analyses, conclusions, and recommendations? Have there been any analyses of direct, aindirect, and cumulative effects for specific areas? If so, is there a report? Has there been any monitoring of the number of vehciles that use the different riparina and floodplain routes? These are all questions that should be answered before 10-20 years of management planning is finalized, as it will be in this Moab RMP	the Resource Management Plan where riparian routes will be taken into consideration. See response to comment 124-33.
ECOS Consulting	9	7	The environmental damage from OHV use is well documented in the literature (Andrews 1990, Brown 1994, Dittmer and Johnson 1975, Forman and Hersperger 1996, Forman and Alexander 1998, Gelbard 1999, Harris and Gallagher 1989, Harris and Scheck 1991, Iverson et al. 1981, Langton 1989, Miller et al 1996, Montgomery 1994, Oxley et al. 1974, Schmidt 1989). Negative direct and indirect ecological effects of OHV use in and near riparian areas include: 1) increased soil erosion and compactions; 2) increased water velocity; 3) plant community destruction; 4) loss of terrestrial and aquatic insect communities; 5) soil, water and air pollution; 6) sound pollution; 7) exotic plant invasion; 8) loss of fish and wildlife habitat; 9) reduction of fish and wildlife populations; 10) Stream bank destruction. These direct and indirect effects all add up to serious adverse cumulative effects over time. Cumulative effects include the near and total loss of wildlife habitat and wildlife species; the destruction of vegetation; sediment buildup due to increased flow velocity, which gets worse over time as more and more vegetation is lost; and arroyo cutting and the lowering of the water table, which robs the adjacent flood plains habitat of moisture transforming it into upland habitat. Does BLM have baseline data for riparian area	See response to comment 124-7. The BLM utilized the best riparian data available in development of the DRMP/EIS.. The BLM acknowledges that routes in riparian areas can have adverse impacts. However, the majority of the impacts occur when the route was constructed. The designated routes consist of previsouly created routes. According to Utah State Office Instruction Memorandum 2005-91 related to Utah Riparian Management Policy, no new surface disturbing activities will be allowed within 100 meters of riparian areas unless it can be shown there are no practical alternatives. Thus, new route construction in riparian areas would very seldom occur. See response to comment 9-5.

			vegetation? Has the BLM analyzed any of its riparian areas for former extent of riparian vegetation compared to today? Does the BLM have any idea what the potential future conditions and extent of riparian habitat could be in any of its perennial or ephemeral streams? If so, BLM must include this information in the Drat Moab RMP/EIS so that the public can make an informed assessment. It is highly recommended that the BLM perform these types of analysis before committing to 10-20 more years of management without adequate background baseline, trend, and potential habitat extent information.	
ECOS Consulting	9	8	How can the BLM cite a scientific publication like the Stokowski and LaPointe (2000) paper (BLM Moab RMP/EIS page 4-464 Sec 4.3.19.8.2), and then ignore all the conclusions about the adverse environmental and social effects of roads? By not providing and adequate range of alternatives for the number and extent of "D Roads"/OHV routes allowed, the BLM is ignoring its own admissions of serious impacts, and appears to discount these adverse impacts as insignificant. Many of the "D Roads" were originally formed by mineral exploration and development activities that have ceased long ago. They are unplanned and redundant, and many of these areas can be easily accessed using other "B Roads", and /or state highways. All designated routes should have a designated function. What are the purposes for many of the "D Roads" currently in the Travel Plan? If many of these roads remain open for the next 10-20 years, the future of much wildlife habitat is at risk due to many of the adverse impacts listed above. This has not been adequately addressed in the Moab RMP/EIS	See response to comment 124-40 regarding the range of alternatives. See response to comments 124-43 and 124-59 relating to purpose and need of routes. The BLM asserts that by limiting travel to designated routes and by eliminating about 2500 miles of inventoried routes would have a positive impact on wildlife habitat.
ECOS Consulting	9	9	Inadequate Analysis of Short- and Long-Term Effects of Livestock Grazing. The BLM has failed to consider	See response to comment 9-3.

			adequately the extensive adverse long-term and historic direct and, indirect, and cumulative impacts of livestock grazing. The extremely high historical stocking rates and overgrazing, and livestock preferences for certain more palatable plants, has lead to significant alterations in the species composition of vegetation types across the Southwest (Leopold 1924; Cottam and Steward 1940; Cooper 1960, Buffington and Herbel 1965; Humphrey 1987; Grover and Musick 1990, Archer 1994, Fleischner 1994; Pieper 1994; Mac et al. 1998). Livestock also altered vegetation composition by serving as the vehicle for the spread of weedy and exotic plant species (Mac et al. 1998, Warshall 1995). Livestock use of riparian zones has had particularly significant negative ecological impacts (General Accounting Office 1988; Szaro 1989; Bahre and Shelton 1993; Fleischner 1994, Mac et al. 1998). In this Draft Moab RMP/EIS, the BLM proposes to exclude livestock from only 48,220 acres for the benefit of wildlife? This is woefully inadequate because it represents only 2.6% of the 1,800,000 acres of the Moab Planning Area. In other words, livestock grazing will be allowed on more than 97% of the Moab Planning Area, even though most of the soils and vegetation types are extremely susceptible to damage form livestock. The BLM is ignoring the serious short- and long-term adverse impacts from livestock grazing in desert environments that have been documented in so many published papers, see above list. Livestock grazing has one of the most widespread and greatest negative impacts on the ecosystem than any other land use. Overgrazing is widely considered a major trigger of soils erosion, flooding, and arroyo cutting in the Southwest (Wooton 1908; Leopold 1924, Cooperrider and Hendricks 1937; Cottam and Stewart 1940; Smith 1953; Cook and Reeves 1976; Bahre and Bradbury	Alt C of the DRMP/EIS proposes to close 114,234 acres to grazing.

			1978; Branson 1985; Bahre 1991, Mac et al. 1998). How can allowing livestock grazing on over 97% of the Moab Planning Area be considered “multiple use” when this activity adversely affects all habitats and all other activities? How can allowing livestock grazing on over 97% of the Moab Planning Area enable the BLM to achieve “sustained yield” when this activity is known to have serious adverse impacts on biological soil crusts and vegetation? Along with OHV use, this is one of the primary issues that the BLM must begin to manage properly, if its management is to have any effect on providing a healthy ecosystem for future generations. The range of alternatives for livestock grazing is not adequate and must be expanded to include alternatives that allow little (15-25%) or no grazing (0%) or some grazing (50%), or a lot of grazing (90%). As currently planned, with most of the area with in the Moab Planning Area open to the widespread soil and vegetation adverse impacts of livestock grazing, on over 90% of the 1,800,000 acres, it appears that the mandates of “multiple use” and “sustained yield” are in jeopardy. This is a certainly is not “ecosystem management” for the good of the American people. It is well documented in the scientific literature that the adverse impacts of livestock grazing have greatly altered the upland and riparian areas within the Southwestern U. S. for many, many, years (Fleischner 1994, Mac et al. 1998). So much so, that historic floodplains and riparian habitat have been transformed into uplands, many streams have become entrenched due to erosion an arroyo cutting, and native vegetation communities have been reduced to a fragment of what they once were. The disappearance of native vegetation an mature biological soil crusts in many	

			areas is a direct effect of grazing. Livestock grazing remains a key process affecting Southwestern ecosystems, and eliminating livestock entirely may be the only way to allow some systems to recover (Mac et al. 1998) These adverse impacts have serious direct, indirect , and cumulative negative effects on soils, vegetation , water quality and quantity, wildlife populations viability, reproduction, and habitat suitability. The extent and duration of theses impacts must not be ignored by the BLM in this document that plans for the next 10-20 years. "The mission of the BLM is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations" (BLM 2001). This mission is in jeopardy if livestock grazing is allowed to continue on over 90% of the Moab Planning Area, and if correcting these long-term and adverse impacts is not a top BLM priority.	
ECOS Consulting	9	10	The BLM is Not Using "Ecosystem Management" Principles. The BLM must use the principles of "ecosystem management" in order to conserve its lands for future generations. "In the Management of the Nation's public lands there is a shift form the traditional "multiple use" management model to a large scale "Ecosystem Management" paradigm in the BLM and other Federal management agencies" (Keith 1994). Since 1993, the BLM has committed to a new approach that implements a scientifically sound, ecosystem based strategy for managing lands. This is called "ecosystem management" which can be defined simply as keeping natural environments healthy, diverse and productive so people can benefit from them year after year. The ecosystem management approach means identifying limits to the use and development of the land's recourses and managing within those limits in order to ensure the long-term health , biodiversity, and	The BLM does not have any rules or policies regarding Ecosystem Management in the land use planning process.

			productivity of the environment. For many areas, is also means trying to restore damaged land to healthy conditions. In adopting “ecosystem management” the BLM recognizes that natural systems must be sustained in order to meet the social and economic needs of future generations. After examining the BLM's Draft Moab RMP/EIS, we are startled to find very little mention of "ecosystem management", especially when considering the wildlife and fisheries sections. According to this plan, management of the Moab Planning Area is to proceed pretty much as it has in the past 50-100 years, reactive and with very little room for actual "ecosystem management". The BLM's own publication "Ecosystem Management in the BLM: from Concept to Commitment. (USDI BLM 1994)", describes the principals and philosophical framework for ecosystem approaches. Has the BLM defined limits to the use and development of the lands resources in habitats within the Moab Planning Area? Has the BLM formulated a strategy for managing within those limits? Is the BLM using any of the nine principals referenced above? No information of this sort can be found in the Draft Moab RMP/EIS. How does "ecosystem management" fit into planning the next 10-20 years in the Moab Planning Area?	
ECOS Consulting	9	11	Where there are healthy populations of top predators, like mountain lions, bobcats, bears, foxes, and coyotes; the prey species, such as mule deer, pronghorn antelope, bighorn sheep, and elk, must also live in abundance. Where prey populations are healthy, there must be sufficient forage for them, therefore the protection of areas large enough to support populations of predators can result in the preservation of the whole range of species, both animals and plants, as well as the integrity of the complex ecosystem they inhabit. The management of habitat to ensure healthy	The BLM has worked with the Utah Division of Wildlife Resources (UDWR) to delineate important habitats for big game species of wildlife upon which predators depend. Proposed management decisions in the alternatives for the DRMMP/EIS to protect wildlife habitat include restrictions to oil and gas leasing and other surface disturbing activities, the removal of grazing in high value wildlife allotments (Cottonwood, Diamond, Bogart, Pear Park, North and South Sandflats, and Between the Creeks allotments). Predators are managed by UDWR.

			populations of predators must be the goal of the BLM in its future management of public lands, in order to obtain ecosystem balance and manage according to its own "ecosystem management" commitment.	
ECOS Consulting	9	12	BLM's Failure to make Trampling and other Surface Disturbance and Destruction Activities a Top Priority. Throughout this Moab RMP/EIS there are statements implying that trampling and other disturbances of the soil would have only short-term adverse impacts. BLM provides no supporting data for this position, and based on my research and experience, this is simply not true. This view denigrates the serious long-term adverse impacts of the destruction of biological soil crusts. Any trampling of biological soil crusts (BSCs), which cover over 90% of exposed soil in the Moab Planing area, will have serious short- and long-term negative impacts because of the high soil erosion potential, importance to maintaining native vegetation communities, and slow natural restoration rates of these soil and vegetation types. Trampling and other soild disturbances have serious widespeard and negative long-term ramifications on the quality of wildlife habitat and wildlife populations. Avoiding trampling and other surface destruction activities must be first and formost in the BLM planning of soil 'multiple use' management activities that have the goal of "sustained yeild".	On pg. 4-279 of the DRMP/EIS the BLM recognizes the importance of biological soil crusts. On this page it states that these crusts help to stabilize soils, reducing erosion, and increasing soil productivity. It is further noted that these soils have not been mapped and are therefore only discussed qualiatively. On pg. 4-282 the BLM acknowledges that "grazing would have direct adverse impacts on soil productivity…due to trampling of soils and loss of biological soil crusts. On pg. 4-286 the BLM acknowledges that mineral development to biological soil crusts. It goes on to say biological soil crusts would potentially be crushed during surface disturbance….Damaged biological soil crusts would also take longer to be reclaimed after the completion of development due to the long period of time needed to develop these crusts. On pg. 4-287 it states that minerals development would have both shot term impacts including the destruction of biological soil crusts. The references cited above are examples of the analysis of impacts to biolgocial crusts in Chapter 4. There are no laws, regulations, or policies requiring the protection of biological soil crusts.
ECOS Consulting	9	13	All "right-of-ways" and "easements" must be limited to no more than 100 meters in width. The width and extent of "Righ-of-Ways" and "Easments" planned in alternatives A, C, and D are too large to maintain functional ecosystems, viable unfragmented wildlife populations, natural vegetation communities, intact soil structure, and prevent widespread wind (dust) and soil	The commentor refers to rights-of-ways and easements being limited to no more than 100 meters. There is nothing in the alternatives of the DRMP/EIS limiting the width of right-of-ways. The width right-of-ways is determined on a site specific basis. The width of proposed utility corridors is specified by alternative in the DRMP/EIS. A half mile width proposed for Alt C

			erosion. As planned these "adverse impacts of land and realty decisions" have a high probability of causing serious adverse impacts on wildlife habitat quality and connectivity. The BLM must analyze the extensive short-and long-term direct, indirect, and cumulative impacts of these decisions in more detail.	represents the area in which utilities would be placed. This does not mean that surface disturbance would occur throughout the corridor. Designation of a utility corridor is intended to reduce the impacts to resources by concentrating these necessary infrastructure needs.
ECOS Consulting	9	14	The BLM must plan for the protection of migratory birds by listing and mapping important habitat types, and keeping designated "D Roads" and other activities to a minimum in these areas. None of this type of planning is evident in this document.	On pg. 4-252 of the DRMP/EIS there are six decisions common to all alternatives that provide protection for migratory birds. The needs of wildlife including migratory birds were considered during the travel plan process.
ECOS Consulting	9	15	What are the direct, indirect, and cumulative effects of leaving the White Wash Dunes Area Open to OHV use? Has the BLM assessed the cumulative effects of past management on this area? If so, are there any data, analyses, reports? Does BLM have baseline data for resources such as vegetation, soil, wildlife, invertebrates and macro-invertebrates, and water quality for the dune area? If yes, where is this data and when was the baseline data collected? Does BLM have resource monitering data for the dune area predating the use of the area by OHVs? This information must be disclosed in the DRMP so that the public can review and assess the BLM's proposal to allow cross-country OHV use in this unique ecosystem. The BLM determined in 2005 that most of the riparian habitat in White Wash was in a "Functional at Risk" condition with a downward trend. Of a total of 1066 acres of riparian habitat in White Wash, 1042 acres are Functional at Risk with a downward trend (BLM 2005). Has the BLM monitored this since 2005? What is the current condition of the riparian areas in the White Wash Dunes area?	Alt C in the DRMP/EIS greatly reduces the area open to cross country travel thus reducing the impacts from cross country travel in this area. In addition, within the proposed open area the BLM imposes management decisions to protect the White Wash water sources and dune field Cottonwoods. The BLM does not have any monitoring data predating OHV use in this area. The BLM contracted a study with Brigham Young University in 2005 to inventory the dunes for rare and unique plants. No rare unique or endemic plants were found. Throughout Chapter 4 of the DRMP/EIS the BLM discloses the impacts of the White Wash open area on natural resources.
ECOS Consulting	9	16	The DRMP fails to adequately assess and disclose the direct, indirect, and cumulative effects of designating the White Wash Dunes Area "open" to cross-country OHV use. I have been to this area numerous times in	Throughout Chapter 4 of the DRMP/EIS the BLM discloses the impacts to the White Wash open area to natural resources.

			the past two years and have documented extensive and continuing damage to the dunes, vegetation, and the riparian areas in and surrounding the dunes due to OHV use. I have also witnessed increased erosion and the loss of surface water due to the impacts of OHV use. The OHV's have elimitated the vegetation and widened the channels in the riparian areas, making them susceptible to erosion and higher rates of evaporation, thus, destroying wildlife habitat for a range of large and small species from macro-invertebrets, to amphibians, to migratory birds, to Desert Bighorn Sheep, to possibly Mexican Spotted Owls. It is recommended that the riparian area should be down-listed to a "Non Functional" rating due to continued soil compaction and incremental loss of riparian vegetation. There is a known group of Desert Bighorn Sheep that live in and around the White Wash Sand Dune area and although it may appear that the OHV's do not disturbe them, how do we know what level of physiological stress is occurring? Could the disturbance heighten their susceptibility to disease, or lower their ability to reproduce? Have these questions been addressed and if so, what are the results? Are there any reports on this? What are the results of monitoring the Desert Bighorn Sheep in the area? What are the direct, indirect, and cumulative impacts of OHV's in the White Wash Sand Dune area on the local wildlife populations?	The BLM proposes management actions in Alt C of the DRMP/EIS that close by fencing the dune field Cottonwood trees and White Wash water sources thus protecting vegetation and riparian areas. The degree of specificity of information desired by the commentor is not availablle. In Alt C (preferred alternative) of the DRMP/EIS, the BLM has closed inventoried routes in bighorn sheep escape terrain and has limited the open area to exclude this terrain.
ECOS Consulting	9	17	The BLM mentions in this document that it is monitoring aquatic macroinvertebrates at various sites throughout the Moab Planning Area. What are the results of this monitoring program? This information can be extremely valuable in determining the condition of a water body or system, and must also be summarized and presented in this document.	The BLM could not find any reference to aquatic macroinvertebrate monitoring anywhere in the DRMP/EIS. Any data that the BLM may have would be used to analyze impacts for site specific proposals.
ECOS Consulting	9	18	The monitoring, analysis of data, and active protection of water quality and quantity in this desert environment	On pg. 3-121 of the DRMP/EIS it states that the BLM participates in a cooperative program with the Utah

			must be a top priority in this Moab RMP/EIS. The results of past monitoring must be presented in order for the public to determine if these areas are being properly managed, and if not, what mitigation needs to be done to improve condidtions.	Department of Environmental Quality to sample sites for water chemistry. Through this cooperation streams that do not meet water quality standards are placed on the list of impaired waters of Utah. For the Moab planning area the streams are Onion Creek, Mill Creek, Castle Creek, and Kens Lake. The BLM is actively engaged with site specific measures to improve these water bodies ultimately hoping to remove them from the impaired list. Alt C of the DRMP/EIS provides measures to protect these streams.
ECOS Consulting	9	19	The BLM must develop Water Management Plans (WMPs) for each watershed as soon as possible in order to properly manage all the resources of a watershed, and in particular, to prevent, to protect vital and sensitive components such as riparian areas, perennial streams, seeps, and springs.	There is no policy, guidance, or legal requirement for the BLM to prepare watershed management plans. The BLM land use planning manual (H-1601-1) does not specify for management of BLM lands on a watershed basis. On pg. 2-3 of the DRMP/EIS it states for all action alternatives that the BLM would develop watershed management plans for municipal watersheds to ensure water sources are protected adequately. These implementation plans would be prepared upon completion of the land use plan. It also states on pg. 2-3 for all action alternatives to allow no surface occupancy and preclude surface disturbing activities within 100-year floodplains, within 100 meters of a natural spring, or within public water reserves.
ECOS Consulting	9	20	There are no Plans to Protect and Enhance Threatened and Endangered Fish Habitat. The goal stated in this Draft Moab RMP/EIS for wildlife and fisheries are to protect and enhance habitats to support natural wildlife diversity, reproductive capability, and a healthy self-sustaining population of wildlife and fish species. In addition, the BLM has committed to managing crucial, high value, and unfragmented habitats as management priorities. Yet, nowhere in this document can there be found any	On pg. 2-45 of the DRMP/EIS it states that for all alternatives no surface disturbing activities would be allowed within the 100 year floodplain of the Colorado River, Green River, and at the confluence of the Dolores and Colorado Rivers. Any exceptions to this requirement would require consultation with the U.S. Fish and Wildlife Service. Restrictions on surface disturbance within this critical habitat would be developed through this consultation process. On pg. 2-44 of the DRMP/EIS it states that the BLM

			provisions for protecting, enhancing, or restoring crucial floodplain habitat along the Green and Colorado Rivers. The following fish species need backwaters in healthy floodplains in order to reproduce successfully and become self-sustaining: Roundtail chub, Flannel mouth sucker, Colorado Pike Minnow, and the Humpback Chub. These highly productive low-velocity habitats are thought to be an essential component of the life history of these species. But they have been hydraulically cut off because of low flows due to dams, water use upstream, and poor riparian and floodplain conditions. The BLM must provide a plan for restoring and enhancing this valuable habitat along the Green and Colorado Rivers during the next 10-20 years. Natural healthy floodplain functions the BLM should manage for include: 1. Food, decay of plant material, phytoplankton, algae, zooplankton, invertebrates, small fish; 2. Enhanced water temperatures, nutrients, and light intensities; 3. High quality water; 4. Shelter from high velocities; 5. Vegetative cover for predator avoidance, a structurally complex environment; 6. Nursery rearing habitats; 7. Spawning habitats. By working to restore, enhance, and protect riverine riparian and floodplain habitat for the Threatened and Endangered fish of the Green and Colorado Rivers, the BLM will also provide for the habitat needs of many other wildlife species, including migratory birds, the endangered willow flycatcher, the threatened Bald Eagle, and the Yellow-Billed Cuckoo.	would follow current and future recovery plans and manageme habitat for Threatened and Endangered and BLM sensitive species. Thiis would include the Colorado Squawfish recovery plan, the Colorado Pikeminnow recovery goals: amendment and supplement to the Colorado Squawfish recovery plan, the Humpback recovery plan, the Humpback Chub recovery goals: amendment and supplement to the Humpback recovery plan, the Bonytail recovery plan, the Bonytail recovery goals amendment and supplement to the Bonytail recovery plan, Razorback Sucker recovery plan, Razorback Sucker recovery goals: amendment and supplement to Razorback recovery plan.
ECOS Consulting	9	21	Page 4-241,3rd Paragraph, 4.3.11: "AML" is not defined and is not listed in the "Acronyms and Glossary" section. It is highly probable that the protection of sites from "hazardous materials spills and spill site cleanup" will involve some amount of soil disturbance and drainage re-direction and/or storage. Such activities	The acronym AML is defined on pg. 2-10 of the DRMP/EIS as Abandoned Mine Lands. This acronym will be added to the glossary. AML projects are implementation actions in which the potential environmental impacts would be analyzed on a case by case site specific basis following completion of the land

			could seriously effect riparian soil, vegetation, and water quality resources and negatively impact these resources for many years. Of course, these activities will be designated to avoid riparian impacts, but extreme care must be exercized in the design and short and long-term maintenance of these facilities. If anything goes wrong, such as a breach created by a flood, vandalism, or damage from off-road-vehicle activities, than the resualtant spill could have serious effects on the riparian resources of the surrounding area and downstream. These potential impacts must be considered in this RMP.	use plan.
ECOS Consulting	9	22	4.3.11.1 Impacts of Fire Management Decisions on Riparian Resources. Page 4-241, 4th Paragraph, 4.3.11.1: Non-fire fuel treatments are not the only issue to consider. Impacts of fire management decisions within the greater watershed could have serious environmental consequences in downstream riparian areas. Fire fuel treatments upstream and adjacent to riparian resources have a great potential to increase soil erosion and introduce exotic weeds into the riparian areas. Runoff from these upstream activities could also seriously impact water quality, increasing salinity, selenium, and many other chemicals in unnatural quantities. The direct, indirect, and cumulative impacts of these activities have not been, and must be analyzed in detail in this Moab RMP/DEIS.	Fire treatments are implementation actions in which environemtnal impacts would be analyzed on a cases by case, site specific basis following completion of the land use plan. This environmental documentation would consider ptoential environmental impacts to soil, water, air, and potential for exotic species invasion.
ECOS Consulting	9	23	4.3.11.2 Impacts of Lands and Realty Decisions on Riparian Resources. Page 4-241, 5th paragraph, 4.3.11.2: The statement that riparian areas are protected from impacts of lands and realty decisions because surface disturbance is not allowed within 100meters of riparian areas is misleading and false presumption. Riparian areas are intimately connected to adjacent areas through a complex network of small and large drainage patterns that far exceed 100 meters. Any disturbance within this network has a distinct and	See response to comment 9-2. Realty decisions are implementation actions in which environmental impacts would be analyzed on a case by case, site specific basis following completion of the land use plan. This environmental impacts would consider potential environmental impacts to riparian areas.

			real possibility of impacting nearby riparian areas. Impacts include soil erosion and arroyo development, the introduction of exotic weed species, drainage into the system of pollutants and contaminants effecting water quality, and the disturbance of wildlife. Riparian areas are the primary habitat, providing food, water, and shelter for most wildlife in the desert, and they are primary wildlife corridors, allwoing access to movement and protection from preditors. One hundred meters is simply not enough of a buffer to mitigate wildlife disturbances and other impacts from BLM lands and realty activities. This buffer should be expanded to at least 1500 meters.	
ECOS Consulting	9	24	Page 4-241, 6th paragraph, 4.3.11.2: Due to the extreme ecological importance of riparian areas exceptions should be granted in only the most dire and emergency situations. When an exception is granted, the receiving party should be given mitigation orders that not only completely restore the disturbed area but also include extended projects that enhance the immediate area. An example would be controlling any exotic weeds in the area and reseeding with native vegetation. These mitigation projects should be designated to have adequate follow-up procedures to ensure that restoration objectives have been achieved. This would satisfy BLMRiparian Guideline #3 (Mangement practices maintain or promote suficient residual vegetation to maintain, improve, or restore riparian-wetland functions of energy dissipation, sediment capture, groundwater recharge and stream bank stability.), and BLM Riparian Guideline #9 (Native species are emphasized in the support of ecological function.). It would also satisfy the BLM Riparian Standard for Native Species: Healthy, productive and diverse populations of native species exist and are maintained. These standards have been established in the 43 Code of Federal Regulations 4180.2. Has the	The Utah State Office Instruction Memorandum 2005-091 regarding Utah Riparian Management Policy defines the exceptions for the requirement that no new surface disturbing activities will be allowed within 100 meters of riparian areas. This exception language was included in the DRMP/EIS.

			BLM developed mitigation plans that have been independantly reviewed and accepted by the general public? If so, what specific measures is the BLM requiring?	
ECOS Consulting	9	25	Page 4-242, 2 Paragraph, 4.3.11.3: Given the known and well documented adverse impacts of grazing, and the impairment this activity thrusts upon riparian ecosystems, the BLM should take a serious ecological approach to managing grazing more intensely and with effective rules and regulations that protect riparian resources. Riparian areas are the most productive and ecologically important habitat type in the desert Southwest. Its is estimated that between 75-85% off all biological productivity occurs in riparian areas. According to the BLM's own numbers, riparian habitat makes up a scarce 0.75% of the total area of land that will be managed by the Moab RMP (13,450 acres out of a total of 1,800,000 acres). The Moab RMP is proposing management for about the next 10-20 years and probably even longer, thus BLM should take a proactive and critical stance on the effects of grazing on riparian resources. In the best scenario (Alternative B) the BLM proposes to protect only 34% of existing riparian area or only 4,422 acres out of a total of 13,450 acres of riparian area. This represents less than 0.25% of the total area managed by the Moab RMP/EIS. This is clearly inadequate. Alternative C also falls far short of adequately protecting riparian resources because it protects even less total area. This alternative proposes the protection of only 1,169 acres out of a total of 13,450, which represents less than 0.06% of the ntotal land in the Moab Planning area, and less than 9% of riparian habitat in the Moab Planning Area. The Moab DRMP's range of alternatives with respect to grazing is unreasonably narrow and inadequate. Protecting only 32.9% (Alternative B), or 8.7%	Riparian areas are evaluated on an allotment specific basis during the Permit Renewal process using Standards for Rangeland Health and Guidlelines for Grazing Management.

			(Alternative C), or 7.4% (Alternative A), or 3.7% (Alternative D) of the most important habitat in the Moab Planning Area from the known impacts of livestock grazing, especially when riparian habitat constitutes less than 1% of the total landscape, is clearly not acceptable. Especially considering that this plan will be in effect for the next 10-20 years. It is recommended that management is based on the BLM's own riparian standards and guidelines. In order to achieve these guidelines the BLM must inventory all its riparian resources, prioritize these riparian areas according to severity of impacts, rate these riparian area according to BLM proper functioning condition methodologies (USDI 1993), and institute effective restoration plans of these valuable resources. Due to BLM's poor history of protecting riparian resources, this work must be done in cooperation with other agencies, and private groups and consultants in order to ensure unbiased results. Adoption of these recommendations would satisfy the BLM's Riparian Standard fo Riparian/ Wetlands: Riparian-wetland areas are in properly functioning condition. These standards have been established in the 43 Code of Federal Regulations 4180.2.	
ECOS Consulting	9	26	Page 4-242, Table 4.71: Percentages are wrong. Actually they are: 32.9% (Alternative B), 8.7% (Alternative C), or 7.4% (Alternative A), or 3.7% (Alternative D).	The BLM agrees that the percentages on Table 4.71 and in the text are wrong and that the percentages provided by the commentor are correct. The corrections to the table and text have been made in the PRMP/FEIS.
ECOS Consulting	9	27	Page 4-242, 4th Paragraph, 4.3.11.3.2: Is "River" an actual grazing allotment? If so, where is it?	Yes. This allotment is located near the Colorado River along Highway 128 at milepost 15.
ECOS Consulting	9	28	Page 4-243, 3rd paragraph, 4.3.11.4:Although surface disturbing activities will be prohibited within 100 meters of the riparian area, what is to prevent any downstream flow from this disturbance from entering the riparian habitat? Mineral resource ground disturbing activities dredge up much material from underground that, if allowed to spread into the riparian area, can be toxic to	The Utah State Office Instruction Memorandum 2005-091 regarding Utah Riparian Management Policy specifies a 100 meter buffer for riparian resources. Proposals for mineral development are implementation actions in which the potential environmental impacts would be analyzed on a case by case site specific basis following completion of the land use plan.

			vegetation, soil, and water quality. There is also the high probability of the introduction of noxious weeds from surface disturbing activities so close to the riparian area. This has the potential to impact large areas downstream of the disturbed sites. Vehicles and ground disturbance are the primary causes that allow the establishment of noxious weeds. One hundred meters is not far enough from riparian areas to allow mining activities and avoid impacts. This should be increased to 1500 meters from riparian areas in order to ensure adequate protection. This would ensure the effectiveness of BLM Guideline # 6 (Management practices maintain or promote the physical and biological conditions necessary to sustain native populations and communities), and BLM Guideline # 13 (Facilities are located away from riparian-wetland areas wherever they conflict with achieving or maintaining riparian-wetland functions.). These recommendations would also allow the BLM to achieve their own Riparian Standards for Soils (Upland soils exhibit infltration and permeability rates that are appropriate to soil type, climate and land form.) and Native Species (Healthy, productive and diverse populations of native species exist and are maintained). These standards have been established in the 43 Code of Federal Regulations 4180.2.	
ECOS Consulting	9	29	Page 4-243, 3rd paragraph, 4.3.11.4: Due to high disturbance and serious impacts, it is highly recommended that any mineral development within riparian areas should not be allowed. Exceptions should be issued only in emergency situations. Riparian areas are too rare (less than 1% of total Moab Planning Area), ecologically sensitive, and ecologically important, that mineral development activities within floodplains and riparian areas should be avoided at all costs. As mentioned above, ground disturbing activities should be kept at a minium of 1500 meters away from riparian	See response to comment 9-24.

			areas and floodplains. Ths distance would serve to protect the soils, riparian/wetland functioning, stream functio, and the native species sections of the BLM's Riparian Standards and Guidelines as defined in the 43 Code of Federal Regulations 4180.2.	
ECOS Consulting	9	30	OHV routes have immediate and direct adverse impacts on wildlife, the appearance of naturalness, primitive recreation, and solitude. They abolish any semblance of undeveloped character for these areas. How will the BLM be able to attain its goals and objectives if it allows OHV routes into these areas? The Moab DRMP should provide a list of Non-WSA lands with Wilderness Characteristics that will contain designated OHV routes. This will help tremendously in assessing impacts. From what can be gleaned from the attached maps, it appears that over 90% of these wilderness characteristic areas will contain OHV routes if Alternative C, the preferred alternative, is selected. How many of these designated OHV routes will be in riparian areas, wetlands, and/or floodplains? The cumulative impacts of these OHV routes could be excessive and lead to the degregation of water quality and quanity, and the destruction of riparian habitat and all the ecological value it contains. These OHV routes within Non-WSA lands with Wilderness Characteristics make up less than 5% of the proposed designated OHV routes within the Moab Planning Area. It is highly recommended that the BLM remove any OHV routes from Non-WSA lands with Wilderness Characteristics in order to attain the BLM goals and objectives of maintaining wilderness characteristics of these lands to assist in bringing the scarce riparian areas into Proper Functioning Condition.	The management of non-WSA lands with wilderness characteristics (WC) is discretionary. Under Alt C, about 18% of the lands determined to have WC would be managed to protect wilderness values. See response to comment 124-7.
ECOS Consulting	9	31	Page 4-244, 3rd Paragraph, 4.3.11.6: Here it is emphasized that limitations on the number and duration of river users and OHV use would minimize damage to	The BLM stands by the assertion that reducing the number of river users has beneficial impacts on riparian resources. This is based BLM experience in managing

			riparian resources. This is not true. Regarding OHV damage, there are many studies that have shown that is the first few passes of an OHV that causes 80-90% of the damage in desert environments. Therefore, limiting the amount of use will only reduce the amount of actual damage by an insignificant amount. Thus, this management strategy is useless from protecting riparian areas from the negative impacts of OHV's. The environmental damage caused by OHV use is well documented in the litature. (Andrews 1990, Brown 1994, Dittmer and Johnson 1975, Forman and Hersperger 1996, Forman and Alexander 1998, Gelbard 1999, Harris and Gallagher 1989, Harris and Scheck 1991, Iverson et al. 1981, Langton 1989, Miller et al. 1996, Montgomery 1994, Oxley et al. 1974, Schmidt 1989). Negative ecological effects of OHV use in and near riparian areas include: 1) increased soil erosion and compaction; 2) increased water velocity; 3) plant community destruction; 4) loss of terrestrial and aquatic insect communities; 5) soil, water, and air pollution; 6) sound pollution; 7) exotic plant invasion; 8) loss of fish and wildlife habitat; 9) reduction of fish and wildlife populations; 10) lowering of the water table. In order to manage riparian areas successfully, so that they become functioning systems, OHV's must not be allowed. OHV use destroys vegetation, degrades stream banks, and forms channels that floodwaters follow and gouge during storms. The BLM must consider the direct, indirect, and cumulative impacts of OHV use in riparian areas more detail and must include its quantative and scientific analysis in this Moab	the major river systems in the area. The BLM agrees with the commentor that most of the impacts associated with cross-country OHV use occurs with the first few passes. This is why cross-country travel has almost been completely eliminated, except for White Wash sand dunes, in the action alternatives for the Travel Plan in the DRMP/EIS. See response to comment 124-7.

			RMP/EIS. Can the BLM provide analyses and examples of riparian areas where OHV's are allowed but there are no serious impacts? I have documented (Schelz 2006 and 2007) the destructive impacts of OHV's in Tenmile Canyon in the Moab RMP Planning Area and in Arch Canyon, just south of the Moab Planning Area. My documentation included a Proper Functioning Condition analysis, including before and after photos, showing many areas where impairment of riparian resources is occurring. OHV use in these riparian areas causes serious impacts to stream sinuosity, stream banks, vegetation, floodplain dynamics, etc. In Tenmile Canyon, most of the length of the canyon investigated was found to be in a "Nonfunctional" condition, or at risk of becoming Nonfunctional with a downward trend, due to the use of OHV impacts. Except for a lack of the potential number of young cottonwood trees, the impacts I observed on the vegetation in Ten-mile Canyon focused primarily in areas where the OHV route was establishedd, and especially in the many areas where there was downstream erosion due to the route location within the streambed, on the stream bank, or where it crossed the stream channel. At these locations, it was common to see denuded and washed out stream banks; a lack of regenerating shrubs (in contrast to the higher levels of shrub regeneration away from the route); a reduction and elimination of ground cover of native grasses, brushes and forbs; lower than expected deep binding root masses along the stream bank; and the presence of undesirable exotic plants (in particular, Tamarisk). The exposed soil in Tenmile Canyon at route crossings, in the stream channel, and on the road bed allows an	

			intensifying cycle of erosion to occur at and downstream of the initial denuded areas, which includes all the attedant negative effects of erosion on water quality and quantity, the elimination of native vegetation, and changes in channel sinuosity and morphology. Negative hydrological impacts were obvious in areas where the OHV route ran alongside and where it crossed the stream channel. Although some segments of stream channels, meanders and point bar formation were evident in the canyon, much of the study area was negatively affected by the straightening of the channel and increased erosion effects caused by the OHV routes. In many instances multiple routes were evident in the same area, probably due to erosion problems and vehicle operators attempting to avoid eroded and damaged areas. Channel straightening occurred from high flows jumping into the incised channels of the OHV route that was adjacent to the stream channel, and from lateral cutting when high flows jumped up onto the route at stream crossings and scoured the stream banks causing the loss of soils and vegetation (Schelz 2007). The impacts described above in Tenmile Canyon are common in riparian areas where OHVs are allowed. Similar impacts are also found in Arch Canyon near Blanding and in Salt Creek in Canyonlands National Park where OHV's are allowed (Schelz 2001, Schelz 2006). Similar negative impacts would be expected in most or all of the riparian areas in which the Moab BLM is proposing to allow OHV use. The BLM's own management stategies recommended the the protection and restoration of riparian areas. Standard 2 states that "riparian areas and wetlands must be in properly functioning condition" (BLM 1997a). As described above, lands within the Moab Project Area	

			have been assessed by independent researchers and found not to be properly functioning condition (Schelz 2007) and in great need of restoration. Whenever an OHV route is found in a riparian area, almost without exception, these routes can be linked as the primary cause of riparian degradation and impairment.	
ECOS Consulting	9	32	4.3.11.7 Impacts of Riparian Management Decisions on Riparian Resources. Page 4-246, 5th Paragraph, 4.3.11.7.1: The BLM has had standards for Rangeland Health for almost 10 years now but there is very little evidence on BLM lands in the Moab area that riparian areas are in better condition due to BLM's stated management standards. Standard 2 states that "riparian and wetland areas must be in properly functioning condition (PFC)", yet there are many riparian areas within the Moab Planning Area that are clearly not in PFC. The DRMP fails to include BLM's monitoring reports and results that determine the condition of the riparian areas. Does Moab BLM have any monitoring reports and results for each of the riparian areas it manages? Who is doing the monitoring? Is it a team of specialists, as specified by BLM PFC protocol, or is it just the range technician who preformes much of this work? Are there any outside reviews of these determinations? Have there been any reports that analyze results and show the trends? How often has any one area been assessed? An area must be assessed more than one time for monitoring to occur and trends determined.	See response to comment 9-6 and 124-33.
ECOS Consulting	9	33	4.3.11.8 Impacts of Soils and Water Resources. Page 4-247, last Paragraph, 4.3.11.8: What is the Definition of the "100-year floodplain". The Moab DRMP fails to define this term, although it is used numerous times. As mentiontioned above, the 100-year floodplain can be extremely difficult to define when considering the amounts of impacts from livestock overgrazing and other disturbances over the past 130 years. Oftentimes,	Maps of the 100-year floodplain are not available across BLM lands. An evaluation of proposed projects within the 100-year floodplain would be conducted for site specifc projects. See response to comment 9-2.

			in this environment, the historic floodplain has been left "high and dry" from arroyo cutting, channelization, and erosion due to over grazing, mining and off-road vehicle impacts. Under the pressure of these impacts, the former floodplain can be transformed over the years into an upland vegetation community that barely resembles a floodplain. Of particular concern are areas adjacent to the "100-year floodplain" and the riparian areas. These areas should have a buffer zone that protects them and the adjacent floodplain from surface disturbing activities. It is highly recommended that a buffer zone of 1500 meters from the riparian area and floodplain be established in order to greatly reduce the possibility of negative impacts stretching into the floodplain and riparian areas.	
ECOS Consulting	9	34	Page 4-248, 1st Paragraph, 4.3.11.8: The development of "Watershed Management Plans (WPM's)" must be a top priority for the BLM. These documents are the first step in effective management of these areas. Impact issues can be best managed if analyzed from a watershed (big picture) perspective. It is unfortunate that none of these plans have been developed to date because proper management is much more difficult without them, and BLM's planning and implementation decisions area become based on inadequate data. When will WPM's be developed? Who will develop them? The DRMP must include a timline commitment to complete these, otherwise the promises in the RMP are hollow. It is recommended that a cooperative effort amongst state, federal, and private organizations be organized. The development of these plans must become a top priority of this RMP in order for the BLM to effectively manage these natural resources for the next 10-20 years.	See response to comment 9-19.
ECOS	9	35	Page 4-248, 2nd- 5th Paragraphs: There is no mention	Table 3.22 on pg. 3-90 of the DRMP/EIS lists the

Consulting			of how many actual watersheds there are in the planning area. How many are there? Have they been prioritized according to condition? What percentage of watersheds are 17 watersheds as proosed in Alternative B, or 8 watersheds proposed in Alternative C? It is stongly recomened that WMP's are vitally necessary in order to properly manage an area into the next 10-20 years. It is extremely important that the development of WMP's for every watershed be given the highest priority.	watersheds and associated streams. The Analysis of the Management Situation contains a map of the major watersheds (Figure 14-1). This document is available to the public on the Moab RMP website. See response to comment 9-19.
ECOS Consulting	9	36	Page 4-279, 1st paragraph, 4.3.13: Biological soil crusts naturally occur (not "could" occur as stated) on over 90% of the soils in the Moab Planning Area. To map the occurrence of biological soil crusts would be extremely simple, wherever there are no rocks, there is, or should be, biological crusts. They do not occur only in small patches of Mancos Shale and in areas where the soil has been disturbed and the biological soil crusts have been destroyed. Page 4-279, 2nd Paragraph, 4.3.13: Acreage may be approximate but it can be assumend that almost anywhere there is soil and not hard rock, you will find biological soil crusts. Since these crusts are anywhere there is soil, then all areas of the Moab Planning Area contain sensitive soils. This is not clear in this document, but should be stated unequivocally.	See response to comment 9-12.
ECOS Consulting	9	37	Page 4-279, 3rd Paragraph, 4.3.13: This paragraph is misleading in many ways. Decisions regarding the management of most of the listed resources do have an effect on soil and water quality. Degraded air quality due to increased vehicle or industrial activities in an area can effect soil and water quality through increased dust in the air and "dry deposition" of toxic chemicals. This can lead to decreased productivity and other problems throughout the lifecycle of many plants and animals, and biological soil crusts.	See response to comment 124-7. The narrative on pg. 4-279 of the DRMP/EIS states that management decisions regarding air quality, paleontology, socioeconomics, special status species, vegetation, visual resources, wildlife resources, or woodland resources would have negligible impacts to soils and water resources. Air quality decisions involve protecting air quality so they

			Allowing recreational fossil collection can lead to soil disturbance and the destruction of biological soil crusts. This can occur by vehicles driving to the sites, and by the actual digging of specimens or in areas where specimens are suspected. What is meant by improving the local and regional economy? If this means increasing visitors then there can be significant increase in soil disturbance and water quality degradation. Increased trampling of soils from vehicles and walking can destroy the biological soil crusts. Human waste can contaminate water sites. Hydrocarbons from vehicles can also contaminate soils and water sites. Improving and maintaining native vegetiation communities can involve mechanical removal of exotics, application of herbicides, and mechanical placement of native seeds, seedlings, or grown plants. All these activities can trample and destroy the biologcal soil crusts and contaminate local water sources. Activities associated with woodland harvesting can be enormously destructive of biological soil crusts. Much soil trampling and compaction occurs when driving vehicles on biological soil crusts, and much trampling of the biological soil crusts can occur when retrieving, cutting, and dragging wood to vehicles, etc. These activities can also increase erosion rates and contaminate nearby water resources. All of these activities must be analyzed in this EIS for direct, indirect, and cumulative impacts to soil, vegetation, and water resources.	would not impat soils and water resources. Paleontology decisions involve protecting paleontological resources and restrictions to collection so impacts to soils and water resources would be negligible. The socioeconomic benefits of the proposed management decisions would not result in impacts to soils and water resources. Vegetation decisions involve treatments, restoration and rehabilitation, stabilization, and control of weed infestation. These decisions are intended to improve vegetation in order to meet the desired future conditions. Special status species decisions involve protecting these species so there would be no impacts to soil and water resources. Vegetation projects are implementation decisions in which the potential environmental impacts would be analyzed on a case by case site specific basis following completion of the land use plan. Wildlife decisions involve protecting wildlife species so there would be no impact to soil and water resources. The visual management decisions provide visual protections and do not impact soil and water resources in and of themselves. The woodland decisions provide areas available for the casual collection of woodland resources. This collection is limited to dead and down trees and access by designated routes. The possibility of illegal cross-country travel is not analyzed because it is not allowed.
ECOS	9	38	4.3.13.1 Impacts of Fire management Page 4-279, 5th	Fuel reduction projects are implementation actions in

Consulting			Paragraph, 4.3.13.1: This plan should discuss in greater detail the procedures used in fuel-reduction projects. Specifically, will machines be used? If so, what will be done to minimize the destruction of biological soil crusts (BSC's), and what is the projected amount of disturbance to soils? In many cases, the destruction BSCs during these fuels reduction project areas can exceed 60-80% of the soil surface. Once destroyed, BSCs take many, many years to recover, depending on site characteristics and micro-environment. The benificial effects of emergency stabilization projects will oftentimes only last a year or at best a couple of years, and the advantages of many of these projects are often canceled by the amount of biological soil crusts disturbance that occurs during placement. The BLM must state specifically what procedures it will follow in order to protect soil and vegetation resources during these fuel reduction projects. Otherwise, there is no ways that the potential damage can be assessed. Are there results of monitoring past fuel reduction projects that the BLM can summarize in this document, so that we can make informed decisions and recommendations? How many fuel reduction projects have been done in the past in the Moab Planning Area? How much soil surface was disturbed? How effective were these projects? What are the indirect and cumulative effects of those activities?	which environmental impacts would be analyzed on a case by case, site specific basis following completion of the land use plan. This anlysis would consider potential environmental impacts to air, water, and soil. See response to comment 124-7.
ECOS Consulting	9	39	Page 4-279, 6th Paragraph, 4.3.13.1: Are catastrophic fires a real and common threat to habitat of the Moab Planning Area? How many have there been in the past 10 years? 50 years? Has there been any research on the actual cause of these lands becoming more susceptible to catastrophic fire? Isn't it possible that catastrophic fires can be a result of mismanagement and allowed destructive uses of the land? There is no data in the DRMP that suggests that fuel reduction	On pg. 4-279 of the DRMP/EIS, for all alterrnatives, states that estimated fuel reduction treatments of 5,000 to 10,000 acres per year would be targeted. Furthermore, because specific areas are not designated for treatment each year, the specific soils affected are uknown; therefore, a qualitative assessment of short and long term impacts follows in the text. The text further states that individual fire management projects will be analyzed at the implementation level with site specific NEPA

			projects are really necessary. The associated activities can cause more problems because of widespread soil disturbance impacts. Is BLM using fuel reduction projects as a way to allow firewood gathering, or to clear an area for increased grazing potential? Has Moab BLM conducted any assessments of these "catastrophic" fires looking at the amount of actual damage that has occurred? Were the soils burned into sterility? Were the crusts completely destroyed? What recovered, and what was the recovery rate? These are all questions that need to be addressed in order to make informed decisions about managing fuel reduction activities for the next 10-20 years.	documentation under all alternatives.
ECOS Consulting	9	40	4.3.13.2 Impacts of Health And Safety page 4-280, 2nd Paragraph, 4.3.13.2: Whereever Abandoned Mine Lands (AMLs) are rehabilitated, the amount of soild disturbance is usually enormous. What precautions will the BLM demand in order to keep surface disturbance to a minium? Is there a protocol that the BLM follows? If so, a summary of these must be included in this plan? Although these toxic materials must be removed, but there are always ways to do it that will cause minimal impact. Does the BLMhave plans for the least destructive ways to rehabilitate these AML sites. Does the BLM insist on using these? The long-term benefits of removing hazardous material are obvious, but are they blinding us to the pitfals of the short- and long-term impacts to the vegetation and soils, such as loss of biological soil crusts destruction and soil compaction, without propper planning of minimal impact methods?	AML projects are implementation actions in which the potential environmental impacts would be analyzed on a case by case, site specific basis following completion of the land use plan.
ECOS Consulting	9	41	4.3.13.3 Impacts of Lands and Reality page 4-280, 3rd paragraph, 4.3.13.3: The BLM states that no particular data on soil crusts exists. This is an avoidance of the issue. In the Moab Planning Area, wherever there is soil, there are likely soil crusts, subtract the exposed rock of an area and that is how much soil crust exists.	See response to comment 9-12.

			Generally, if there are no soil crusts in an area without rocks, then the area has been highly impacted by some previous disturbance. Thus this discussion could be transformed from qualitative to quantitative with little effort. We would like to see this discusion changed from qualitative to quantitative, so that we can make adjustments based on numbers not guesses. The DRMP must include an analysis of indirect and cumulative impacts of these activities.	
ECOS Consulting	9	42	Page 4-280, Alternatives: These sections are confusing. There are no reasons given for expanding the Utility Corridors, yet these areas get larger and larger with each consecutive Alternative. The BLM must explain in more detail the reasons for this enormous expansion from Alternative A through D. These corridors must be kept to an absolute minimum in order to keep serious direct and indirect soil and vegetation impacts low, and to avoid fragmenting the landscape. Why does the corridor expand from 32,502 acres in Alternative A to 65,865 acres in Alternative B. In Alternative C, it is more than 5 times that of Alternative A. What is going on here? What new utilities are planned for the next 20-30 years in the Moab RMP Planning Area? As the utility corridors expand with each Alternative there will be a corresponding increase in negative impacts to soil and vegetation resources in particular, and probably to water resources also. What are the purpose and need of the wide corridors as planned for Alternatives A, C and D? Please provide more detailed information on this so that we can analyze the impacts.	See response to comment 9-13. The increase in acreage between the no action and action alternatives of the DRMP/EIS is due to the conjoining of two existing utility corridors south of Moab along Highway 191.
ECOS Consulting	9	43	Page 4-282, 2nd Paragraph, 4.3.13.4: As stated in this paragraph, livestock have many many indirect adverse effects on water quality. However, not stated are the direct adverse effects on water quality and stream	All resource concerns involving livestock grazing are evaluated on a site specific allotment basis during permit renewal utilizing the Standards for Rangeland Health and Guidelines for Grazing Management.

			morphology. These must be considered in this analysis. Direct adverse effects include the introduction of waste material directly into a stream, increasing fecal coliform counts and total phosphorus; trampling within the streambed and the loss of stream roughness due to the destruction of point bars, stream bed materials, and stream banks; and the increase in salinity, dissolved solids and total suspended solids due to directly trampling and destruction of vegetation and soils on the streambed and stream banks.	See response to comment 9-3.
ECOS Consulting	9	44	Healthy Rangelands, Standard #1 states that " Upland soils exhibit permeability and infiltration rates that sustain or improve site productivity, considering the soil type, climate, and landform". Can tthe BLM show where the monitoring for this standard has taken place? What are the procedures and methods, and how is this monitoring documented? What are the results for the different allotments? Is there any independent analysis or review of this information? I know of numerous allotments in the Moab RMP Planning Area where the field conditions are below the BLM standards. If I don't hve access to the BLM's own monitoring information, how can citizens analyze whether the BLM is doing its job or not? Or how can we trust that the BLM will do its job for the next 10-20 years of the life of this RMP? Without the propper documentation, and an open system of citizen review, the BLM cannot be trusted to make the best decisions, especially considering its past performance and the conditions in the field. There is no mention of a citizen review process in this RMP. It is recommended that the BLM develop for this RMP a process whereby citizens can participate in and review grazing allotment management and monitoring programs.	See response to comment 9-43. An administrative process for interested parties to participate in grazing decisions has been established. This process is followed for all permit renewals and other actions taken on grazing allotments as part of the implementation of this plan. This planning process also includes public participations as provided for in Handbook 1610 and has been followed throughout the development of the RMP. See response to comment 9-3.
ECOS Consulting	9	45	Page 4-282, 4th paragraph 4.3.13.2: Table 4.80 shows the acers of sensitive soils affected by each Alternative. It appears there is little difference between any of the	Table 4.80 refers only to the allotments that are available or not available to livestock grazing for the alternatives in the DRMP/EIS. On allotments that will be available for

			Alternatives. What differences that do exist, are negligible. Is this anyway to manage this most destructive activity on land? Livestock grazing adversely effects just about every part of the ecosystem, its negative impacts are well documented, especially the destruction of soils and vegetation, and the contamination of water. This Moab RMP is a planning document of the next 10-20 years, and the BLM is skimming over the most ecological destructive activity, grazing, as if it could and should just manage itself. Estimated acres of disturbed land is not an analysis and is not adequate. NEPA requires that the BLM perform an analysis of the short-term, long-term, direct, indirect, and cumulative impacts, and that conclusions be based on these analyses. It is recommended that before this RMP is finalized, the BLM make a serious analysis of the effects of grazing on arid lands such as these in the Moab RMP Planning Area, and document their findings so that the public can see exactly what the costs of this activity are on our public lands. Has the BLM documented any studies or monitoring on specific areas within the Moab Planning Area? Are there any results? This information is necessary because it can seriously effect whether or not our public lands are in a functioning condition now and for the next 10-20 years. With this information,and the results of monitoring that the BLM has been doing for the past 40-60 years here in the Moab Planning Area, we, the public, can comment properly on the effectiveness, or lack therof, of grazing management by the BLM.	grazing after completion of the land use plan, site specific analysis will continue to be done during the permit renewal process using the Standards for Rangeland Health and Guidelines for Grazing Management. See response to comment 9-3. The information requested by the commentor is available to the public by request and can be utilized by the public during the permit renewal process.
ECOS Consulting	9	46	Page 4-282, 6th paragraph, 4.3.13.4: The statement that "the earlier in the year the grazing season ends, the fewer impacts to soils and water resources" is misleading. It implies that very little will be impacted if the BLM requires livestock to be removed before the	The assessment of impacts to soils and water from livestock grazing found on pg. 4-282 of the DRMP/EIS is a general statement of these impacts. Resource concerns involving season of use are analyzed during the permit renewal process using the Standards for

			onset of spring. When in fact, there are many negative impacts to upland and riparian soils, vegetation, and waters that take place regardless of the season, and sometimes they are even more severe. This is so because during late fall and winter the livestock need to move around more to find food and there is less protection of soils due to seasonal vegetation loss and over grazing. These impacts include: Wtaer contamination from livestock wastes; biological soil crust destruction from trampling, stream bank destruction and damage from the increased search for food during these low productivity periods; and many other serious impacts. It is recommended that the BLM discontinue using the early season discontinuance of livestock grazing as an example of good management, when in fact, the practice merely inflicts more damage to other areas. Instead of seasonal movements, it is recommended that the BLM do an analysis of direct, indirect, and cumulative impacts from livestack in the Moab Planning Area, and keep animals out of areas with medium to high impacts. This will require a sophisticated monitoring program that is well funded and is able to make meaningful decisions based on field conditions and trends. These studies need to involve the public and outside monitors for the results to be credible and trustworthy.	Rangeland Health and Guidelines for Grazing Management. Standards assessment and monitoring of rangeland conditions is an implementation phase of this plan and is currently an ongoing process.”
ECOS Consulting	9	47	What are the results of water quality monitoring the BLM has been doing for many years now in the Moab Planning Area? What are the trends for the particular areas? Is there a "Water Quality Report" with an analysis of the data and a full explanation of where, when, and what the BLM has been monitoring? Is there an explanation of the results and how the relate to conditions on the ground, and to health standards set by the State of Utah Federal Government? Are there	See response to comment 9-18. Other than the list of water bodies not meeting state water quality standards (303(d) list), water quality was not an issue raised to be resolved by the land use planning process. Water monitoring data will be utilized for site specific projects and this data is available to the public upon request.

			recommendations for improving the water quality? Does an area have to become seriously degraded or qualify for the Clean Water Act 303(d) list before any water quality mitigation is sanctioned by the BLM? Are there any areas within the Moab Planning Area where mitigation measures to improve water quality have been taken before listing on the 303 (d) list? Is the raw data all the BLM is willing or able to supply? The BLM must include summary water quality monitoring information on all water systems that it monitors within the Moab RMP Planning Area, and release a report of past monitoring results and water quality trends. Has there been any monitoring of aquatic macro-invertebrates as stipulated in the BLMs own standards? What is the methodology? Where are macro-invertebrates monitored? How often and when are they monitored? If so, is there a report with data and analyses of macro-invertebrate communities and how they relate to degraded waters? These results should be included in this Moab RMP so that citizens can determine the effects of livestock and other uses on our public lands. We request that the BLM include summary of aquatic macro-invertebrate monitoring information in this RMP, and release a report of past monitoring.	Water quality monitoring data will be utilzed for site specific projects.
ECOS Consulting	9	48	Page 4-286, 6th Paragraph, 4.3.13.5: An additional impact that must be considered is the possibility of a chemical spill at well and mine sites. Does the BLM have any information about the frequency and extent of these types of accidents occurring? If so, this should be included in this plan so that averages can be used and potential cumulative impacts determined.	The Council on Environment Quality regulations do not require an environmental document to analyze a worst case scenario.
ECOS Consulting	9	49	Page 4-287, 2nd Paragraph, 4.3.13.5: Is the BLM considering the price of uranium and the high likelihood of increased exploration and mining of this mineral? There have already been huge increases in interest in opening an re-opening uranium claims throughout the four-corners region. The BLM should be anticipating	The potential uranium development for the Moab planning area is discussed on pg. 4-6 of the DRMP/EIS. This information is based on the Mineral Potential Report prepared for the Moab planning area.

			this and include other areas besides the Book Cliffs andGreater Cisco RFD areas in the analysis. If areas, such as Hatch Point, Eastern Paradox, Lisbon Valley, Roan Cliffs, and Salt Wash are not included, then the BLM and the public will be in the dark when these activities increase again. It is recommended the BLM focus on all of these important areas of the Moab RMP Planning Area in the analysis of the Alternatives. Otherwise, the analysis is woefully inadequate.	
ECOS Consulting	9	50	Page 4-287 4th Paragraph, 4.3.13.5: It is recommended that the BLM presume that most of the predicted 1,015 acres of surface disturbance contain sensitive soils in the form of biological soil crusts.	The commentor has not provided any information regarding the location of biological crusts. There are no maps available of biological crusts and the BLM can not presume that most of this area would contain biological soil crusts.
ECOS Consulting	9	51	Page 4-287, Alternatives, 4.3.13.5: Under the alternatives presented, there are estimates of the amount of soils in the Moab Planning Area that will be disturbed. Are these estimates based on total land surface that will be disturbed, or have the soils been mapped and the amount of actual soil disturbance calculated? Since it is not clear, and there is no mention of seperating out the rock from the soil surfaces then we must presume the BLM is talking about total land surface. Is this correct? If it is, then the BLM is describing some massive mining activities in the next 20-30 years. According to this Moab RMP, in Alternative A, 40% if the land surface of the Moab Planning Area will be disturbed. This represents roughly 720,000 acres of soil disturbance. Under Alternative B, 26% of soils of the Moab Planning Area will be disturbed, reprresenting roughly 468,000 acres of soil disturbance. Under Alternative C, 38% of soils of the Moab Planning Area will be disturbed, representing roughly 684,000 acres of soil disturbance. Under Alternative D, 40% of soils of the Moab Planning Area will be disturbed, representing roughly 720,000 acres of soil disturbance.	Table 4.81, table 4.82, and table 4.83 on pgs. 4-288, 4-289, and 4-293 of the DRMP/EIS provide toatal acres by soil type for different resource activities and allocations. The numbers represent toal acreage by soil type and not the total acreage to be disturbed.

			This magnitude is unacceptable and completely ignores the importance of biological soil crusts to this ecosystem. It also ignores a number of Federal mandates concerning the management of BLM lands. All planning efforts by the BLM are bound to the legal and regulaory mandates contained in FLPMA, 43 CFR 1600, the National Enviromental Policy Act of 1969 (NEPA, 42 U.S.C. 4321 et seq.), the Council on Enviromental Quality (CEQ) regulations at 40 CFR 1500-1508, and other applicable Federal laws and regulations. BLM's mandate under the Federal Land Policy and Management Act of 1976 (FLPMA) is to manage the public lands for multiple use, while protecting the long-term health of the land. Where is the multiple use if the range of Alternatives allows between 468,000 acres and 720,000 acres of land surface and biological soil crusts to be destroyed? Given the preferred Alternative (C), the BLM is willing to destroy approximately 684,000 acres of soil in order to allow mineral development. That represents almost 40% of the total Moab Planning Area! Is this management for multiple use, or primarily for one use? Is this protecting the long-term health of the land? It appears there isn't any room for other uses besides livestock grazing, mining, and oil and gas development. This is a backward vision that ignores the future and ignores the long-term health of the land. The BLM must have a vision for the future that includes the mandates of FLPMA. The BLM must make room for alternative uses of the land. Uses that are less destructive and incorporate the spirit of FLPMA: to allow for multiple use, and to protect the long-term health of the land. The National Enviromental Policy Act (NEPA) of 1969 specifically provides instructions to the BLM and other	

			Federal agencies for developing a range of reasonable alternatives in environmental impact statements (EIS). NEPA assures that the BLM other federal agencies) will consider the impact of an action on the human environment before decisions are mad and the action is taken. It requires that NEPA documents concentrate on issues that are significant to the action in question. The NEPA process is intended to help public officials make better decisions based on an understanding of the direct, indirect and cumulative environmental consequences and take actions that protect, restore, and enhance the human environment. This Moab RMP/EIS appears to be ignoring the mandate of NEPA by not providing a reasonable range of alternatives nor sufficient indirect and cumulative effects. The BLM must develop different Alternatives for mining and mineral development activities that cover the whole spectrum from no activity, to a mix with other activities, to Alternative D. Also the BLM must analyze the indirect and cumulative impacts using commonly accepted methods such as a discussion on thresholds, trends analyses, and carrying capacity analysis? How about ecosystem analysis, economic system analysis , and social system analysis? Has the BLM attempted to engage any of these kinds of analyses with specific and known impacts. The lack of this information constitutes a major fault in this environmental analysis and thus in this Moab RMP/EIS. The Council on Environmental Quality (CEQ) provides guidance to the BLM and other Federal agencies on the extent to which agencies of the Federal government are required to analyze the enviromental effects of past actions when they describe the cumulative environmental effect of a proposed action. In the Moab RMP, there is no apparent attempt to look at the	

			environmental effects of past actions concerning the effects of mineral production, nor is there any mention of cumulative effects. Regarding cumulative effects, these can be significant when considering the destruction of soils and biological soil crusts. The destruction of biological soil crusts will affect all species at every trophic level, and result in a degraded state of the ecosystem, probably even impairment. These negative impacts will not be limited to the area disturbed but will spread out into the surrounding region. An example is the increase of wind-blown sand due to the destruction of biological soil crusts. This dust and sand eventually covers the biological soil crusts of the surrounding area, killing the crusts. We must be extremely careful when allowing activities that destroy biological soil crusts, these crusts are the glue that holds the natural system together. The continuum of impacts can spread out over large tracts of land, adding a cumulative impact that could spread to 60-80% of the Moab Planning Area. It is recommended that the BLM fully consider the extent of ecosystem impairment caused by past mining and mineral development activities. We also recommend that the BLM completely analyze the cumulative effects of the proposed Alternatives. We need locations, numbers and acres affected by direct, indirect and cumulative impacts, not general statements, in order effectively analyze the effects of mining and mineral development on soils and water resources.	
ECOS Consulting	9	52	The Clean Water Act (CWA) is the cornerstone of surface water quality protection in the United States. The statute employs a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted	The BLM is obligated to comply with the Clean Water Act, the Endangered Species Act, and Executive Order 11988. See response to comment 9-2. The types of impacts discussed by the commentor are

			runoff. These tools are employed to achieve the broader goal of restoring and maintain the chemical, physical, and biological integrity of the nation's waters so that they can support "the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water." Under the water shed approach of the CWA, equal emphasis is placed on protecting healthy waters and restoring impaired ones. The direct, indirect and cumulative impacts of a number of activities in and adjacent to flood plains would be in direct opposition to the Clean Water Act. Thus it is recommended that all surface disturbing or destructive activities, in particular mining, oil and gas development, OHV use, and livestock grazing be kept at least 1500 meters from the edge of streams, riparian areas and flood plains. We request that the BLM list and describe the known impacts of mining, oil and gas development, OHV use, and livestock grazing and to re-evaluate them in light of the mandates of Executive Order 11988, the Endangered Species Act, and the Clean Water Act. The BLM should also consider the cumulative effects of past management of these activities on riparian ares, flood plains, streams, water quality, and uplands.	site specific and the impacts can only be analyzed at the implementation level.
ECOS Consulting	9	53	Page 4-297, 6th paragraph, 4.3.13.9.2: The BLM's on Rangeland Health Standards and Guidelines state:"...the BLM's 200 million+ acres of rangeland have long been valued for livestock grazing and mining, but rangelands now are also prized for their recreation opportunities, wildlife habitats, watershed, cultural values, and scenery". These guidelines also state: "...It is time for a change, and BLM is changing to meet the challenge. BLM is now giving management priority to maintaining functioning ecosystems. This simply means that the needs of the land and its living and nonliving components (soil, air, water, flora, and fauna)	The BLM utilizes the Standards for Rangeland Health and Guidelines for Grazing Management during the permit renewal process for livestock grazing. The permit renewal process does not involve a land use planning decision.

			are to be considered first. Only when ecosystems are functioning properly can consumptive, economic, political, and spiritual needs of man be attained in a sustainable way". These are very clear guidelines from the BLM's own handbook. They recognize the importance of ecosystems integrity in order to provide balanced uses of the land. They recognize that there are many more uses of the land that are not as destructive as most of the traditional mining, mineral exploration, and grazing uses, and in order to manage for the other uses, these traditional, but outdated uses must be managed intensively, or eliminated, if found to impact ecosystem integrity. It is recommended that the BLM follow its own directive as evidence in the BLM Standards and Guidelines for Rangeland Health, and manage for the "fundamentals of rangeland health". These include: (a) Watersheds are in, or making significant progress toward, properly functioning physical conditions, including their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow. (b) Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities. © Water quality complies with State water quality standards and achieves, or is making significant	

			progress toward achieving established BLM management objectives such as meeting wildlife needs. (d) Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal Proposed, Category 1 and 2 Federal candidate and other special status species. In regards to (a) above, can the Moab BLM Office show significant progress toward properly functioning upland, riparian areas, and aquatic components? Is there documentation of this by independent monitors? Independence is vital because of the history of mismanagement and abuse by the BLM and its known support of that abuse. Is there procedure to insure the continuing health of uplands? Has there been any monitoring of aquatic components, including aquatic macro invertebrates? In upland and riparian areas do soil and vegetation conditions support infiltration? How do we know this? Is there documentation? Is there a report that shows trends since this BLM Standards and Guidelines for Healthy Rangelands was released? If not, is there any data and are there plans to write any reports? Is there a mechanism in place, besides the Freedom of Information Act, so that the public can examine data and results from BLM monitoring? What is the decision process for how to improve rangelands in the Moab Field Office? In regards to (b) above, has there been significant progress toward the maintenance of the hydrologic cycle, nutrient cycle, and energy flow in uplands and riparian areas? If so, is there a report on this? How were decisions made? Was it just an opinion, or were decisions made based on data and analyses? Please provide a summary of the results of these reports in this	

			Moab RMP so that the public can make reasonable judgements and comments. Are the biotic populations and communities healthy? Has there been any monitoring of any biotic populations in uplands or riparian systems in the Moab Planning Area? Are there any reports on this? How can we, the public, know if the biotic populations are thriving or being extinguished? In regards to © above, is water quality complying with state standards? If not, what paameters are not meeting state standards? Or is the BLM waiting for certain water bodies to be listed on the Clean Water Act 303 (d) list before any corrective action is considered? Waters on the 303 (d) list are highly impacted, is the BLM waiting for them to be so degraded before trying to fix the cause? What significant progress is being made toward water quality and wildlife habitat within the Moab Planning Area? Please provide information on this so that we can make informed decisions. In regard to (d) above, is there significant progress for the restoration and maintenance of habitats for species on the Federal Threatened and Endangerd list in the Moab Planning Area? What effort have been made in behalf of Threatened and Endangered wildlife habitat? Had habitat been mapped in the Moab Planning Area? Has potential habitat that is now non-functional condition been mapped? Have any areas been prioritized for the restoration and maintain of Threatened and Endangered wildlife habitat? Has there been significant progress since these standards and guidelines were adopted by the BLM in the mid-1990's? In this Moab RMP the BLM claims to be following its own rangeland health standards and guidelines but offers absolutely nothing to show that this is the case. There is a dire need for analyses of trends and results	

			in order to determine if management is effective, and in order to plan successful future management.	
ECOS Consulting	9	54	Page 4-298, 6th Paragraph, 4.3.13.9.2: What are the Best Management Practices (BMPs) mentioned in this paragraph? We need to see these BMP's in order to make a judgment as to their usefulness and efficacy. This is extremely important because increased soil erosion and dust storm activity is directly linked to soil disturbance activities. Dust storms in the Cisco Desert area have covered biological soil crusts, destroying them and their ecoligical functions, and have caused numerous auto wrecks, many times with human injury and deaths.	Best Management Practices (BMPs) are found throughout BLM policy and guidance for each resource program. The reference on pg. 4-298 is to state the BLM will follow these policies. BMPs are continually being updated and improved with experience. On pg. 2-31 of the DRMP/EIS it states the BLM will work with partners to implement Best Management Practices and continue the BLM's work with the Division of Water Rights and Water Quality in accordance with the administrative Memorandum of Understanding and the Cooperative Agreement addressing water quality monitoring.
ECOS Consulting	9	55	Page 4-298, 9th paragraph, 4.3.13.9.2: Again, limiting activities to a certain time of year is of limited ecological value since biological soil crusts would be destroyed regardless of time of year at most sites in the Moab Planning Area. It is recommended that slopes greater than 30% should not be disturbed. BLM Manual 1730-2 states: "Stocking levels and season of use should be ascertained on an annual basis, jointly by managers and users, with optimal coverage of both vascular plants and biological soil crusts as the management goal (Kaltenecker and Wicklow-Howard 1994; Kaltenecker et al. 1999b). Optimal coverage should be based on site capability and rangeland health indicators of site stability and nutrient cycling". Has the BLM determined proper rangeland health indicators of the site stability and nutrient cycling for the vegetation types in the Moab Planning Area? If so, where is that information? Shouldn't it be included in this important planning document since livestock grazing could have such a detrimental ecological effect on the landscape? Is the	The purpose of the stipulation on pg. 4-298 of the DRMP/EIS is for erosion control on steep slopes greater than 30%. The restriction is applied during the wet period of the yerar. The stipulation was not intended to protect bilogical soil crusts. Resource concerns involving stocking levels are analyzed during the permit renewal process using the Standards for Rangeland Health and Guidelines for Grazing Management.

			BLM using this information when planning annual grazing strategies? If so, how is it being used, and are there records of this? If so, are they available to the public? This information is extremely important to the public so that the proper of improper management of the land can be determined.	
ECOS Consulting	9	56	Page 4-298, 10th paragraph, 4.3.13.9.2: The guidelines from BLM Technical Reference Manual 1730-2 should be strictly adhered to considering the extent and importance of biological soil crusts in the Moab Planning Area. The BLM should remove the wording "where feasible" in this paragraph because it nullifies the strength of the commitment to land health. If the guidelines of the BLM Technical Reference Manual 1730-2 are not feasible, then a proposed project or activity should not be allowed, that is the intention and spirit of 1730-2.	Technical Reference 1730-2 is not a manual and therefore is not policy. The BLM will adhere to this technical guidance where feasible.
ECOS Consulting	9	57	Page 4-300, 3rd paragraph, 4.3.13.9.3.2: The timing limitation listed, December 1 to May 31, would have little to no value in protecting biological soil crusts. The only time these crusts are remotely protected is when that are frozen, which only lasts a couple of weeks in December and/or January. Thus, this would not reduce short- or long-term effects of these activities. The only viable protection of biological soil crusts is avoidance. Does the BLM have any guidance on avoidance of biological soil crusts when planning road construction and other surface disturbing activities? If so, we would like to see this guidance. If not, we would like to see the BLM develop guidelines that truly limit surface destruction during many activities.	There are no laws, regulations, or policies requiring the protection of biological soil crusts.
ECOS Consulting	9	58	Page 4-442, Table 4.138, 4.3.19: This table is missing a number of very important wildlife associations that must be considered by the BLM in its analyses of impacts in this Moab RMP/EIS. Add the wildlife association " aquatic macro-invertebrates" with the Aquatic habitat type. These are extremely important "indicators" of	The tables referred to have been modified as suggested by the commentor in the PRMP/FEIS.

			water quality and aquatic habitat conditions and there has been a commitment by the BLM to monitor these. In the Conifer / Mountain Shrub habitat add the following important wildlife types: Raptors, bobcats, wolves, and coyotes. In desert shrub add, mountain lion, bobcat, fox, and coyote. In Pinyon-Juniper add bobcat, weasels, and raptors. In Riparian / wetland add raptors, bobcat, river otter, beaver, fox, and coyote.	
ECOS Consulting	9	59	Page 4-444, 2nd paragraph, 4.3.19.2: The last sentence states that trampling would have short-term negative effect. This is not true! Any trampling and destruction of biological soil crusts, which the BLM classifies as "Sensitive Soils", in any of the habitats in the Moab Planning Area can have serious long-term effects due to high soil erosion and vegetation loss, and the slow natural restoration rates of these soil and vegetation types. Avoiding trampling and other surface destruction activities must be first and foremost in the planning of fire management activities.	The section referred to by the commentor in the DRMP/EIS (pg. 4-444) involves impacts of fire management decisions on wildlife and fisheries. Therefore, this section has nothing to do with soil impacts. The trampling referred to involves trampling of vegetation and human cause wildlife disturbance. According to US Department of Interior Technical Reference 1730-2 on Biological Crusts, Ecology, and Management when biological crusts are completely removed, recovery can be excessively slow. In contrast biological crusts crushed in place with vehicles, foot traffic, and horses recover much faster especially on fine textured soils.
ECOS Consulting	9	60	Page 4-444, Section 4.3.19.2.1: In what specific areas does the BLM plan to manage with prescribed fires? There are no maps or other resources in this Moab RMP or in the Utah Land Use Plan that show where, and what habitat will be treated. It is difficult to make an assessment of this activity without specific plans, or at least a summary of the plans. Is there a high probability of catastrophic fire in many areas within the Moab Planning Area? What habitats would be susceptible? How much acreage is involved? It seems that most of the Moab Planning Area consists of desert scrub which is not susceptible to fire, unless the cheat grass is unusually thick. Pinyon-juniper is susceptible in many areas in the West but in the Moab Planning Area it is usually not thick enough in most areas to be a	See response to comment 9-39.

			catastrophic fire risk. Sagebrush is probably the most fire susceptible habitat but only incorporates less than 8% of the Moab Planning Area.	
ECOS Consulting	9	61	Page 4-444, Section 4.3.19.2.2: The adverse effects on aquatic and amphibious species are serious impacts that could eliminate certain species if not managed well. What safeguards does the BLM have in place that will minimize these serious impacts? Aquatic species, including fish, macro-invertebrates, and amphibians, are the rarest and most sensitive wildlife species in this desert environment. Thus, it is extremely important for the BLM to manage lands so that these impacts are absolutely minimal. This section is not an analysis of impacts, as it is supposed to be, it is just a series of statements stating the obvious. What is the extent of the direct, indirect, and cumulative impacts on these species if fire suppression and management plans are enacted? What percentage of aquatic habitat will be affected by the various Alternatives? How much adjacent land will be affected by indirect and cumulative impacts? Where are the analyses of these impacts, and what are the reasoned conclusions?	See response to comment 9-39.
ECOS Consulting	9	62	Page 4-445, Section 4.3.19.3: How will AML sites be reclaimed to minimize surface disturbance for the benefit of wildlife and water quality? What safeguards or protocols will the BLM be following in order to minimize impacts? Will there be follow-up monitoring and restoration efforts? How many AML sites are there and how large are they? Are the prioritized according to need of restoration? Are they privatize according to the sensitivity of their location and direct, indirect, and cumulative adverse impacts on aquatic and terrestrial wildlife and habitat? What percentage of the different habitats of the Moab Planning Area will these projects impact? What are the direct, indirect, and cumulative	See response to comment 9-40.

			effects of these activities on bats and other species? These questions need to be addressed before effective future management can be planned.	
ECOS Consulting	9	63	Page 4-445, section 4.3.19.4.1: This is not an analysis of impacts. How many ROW's easements, permits, utility/transportation systems, acquisitions, disposal and withdrawals are anticipated in the next 10-20 years? Without this estimate, an analysis of environmental impacts is impossible. Wilderness Study Areas make up a small percentage of the Moab Planning Area, making most of the rest of the 1,800,000 acres open to these types of impacts. If the authorization of ROW's would have potential direct, indirect, cumulative short- and long-term adverse impacts on wildlife, then there should be an in depth analysis of these impacts on wildlife and estimate of locations and extent of these impacts and what wildlife would be most impacted. As this Moab RMP is written, it is impossible to make even and educated guess, or to attempt to evaluate impacts. The BLM must provide this information, even if it is an estimate, for proper impact analysis.	See response to comment 9-23.
ECOS Consulting	9	64	Page 4-448, 2nd Paragraph, 4.3.19.5.1: The BLM's Standards and Guidelines for Rangeland Health were issued about 10 years ago, 1995 or so. Since the BLM has had at least 10 years to follow and implement these guidelines, what have been the products? Are there any peer reviewed studies and reports showing watersheds are in, or making significant progress toward, properly functioning ecological condition, including the upland, riparian-wetland, and aquatic components? Do soil and plant conditions support infiltration, soil moisture shortage, and the release of their water that are in balance with climate and landform and maintain or improve water quality, water quantity, and tinning and duration of flow? If so, we would like to see the data, analyses, and the location where this monitoring and analyses have occurred.	See response to comment 9-53.

			Is the past any indication of future management? What is the intensity and extent of wildlife habitat that is negatively impacted by livestock grazing? These questions must be addressed before this Moab RMP is released.	
ECOS Consulting	9	65	Page 4-445, 3rd paragraph, 4.3.19.6: That is correct, the amount of land open to oil and gas and other mineral uses is not indicative of the number of acres that would be directly disturbed. When considering the indirect and cumulative impacts, the area impacted often becomes far greater. These impacts must be considered in detail in this Moab RMP/EIS. Has there been an analysis of the indirect and cumulative impacts on wildlife of roads that are created to access these sites? There is much in the scientific literature on this subject. Have there been studies in the Moab area on the indirect and cumulative impacts of downstream water resources affected by runoff of toxic materials from spills and tailings, or from soil erosion? How about downstream contamination of soils? How about wind erosion and the destruction of biological soil crusts on adjacent lands due to being smothered by wind-blown sand and dust? If the small direct impacts could be contained, then these activities would be much more manageable. It is the indirect and cumulative impacts on the project area and adjacent lands that need to be analyzed and are most detrimental to wildlife and many other resources.	Section 4.3.19.6 of the DRMP/EIS is found on pg. 4-453. The BLM statement on pg. 4-453 that states that the amount of land open to oil and gas and other mineral resources is not indicative of the number of acres that would be directly disturbed. The analysis assumptions on pg. 4-3 and 4-4 specifies the number of wells projected over a 15 year period based on the restrictions applied to the diiferent alternatives. It further assumes there would be 15 acres of surface disturbance per well. The number of wells are projected across the areas available for oil and gas leaing and the exact locations can not be identified specifically. Consequently, the amount of estimated surface disturbance is only a small amount of the total acreage available. Proposed oil and gas development projects are implementation actions in which the potential environmental impacts would be analyzed on a case by case, site specific basis following completion of the land use plan. The environmental documentation would include an assessment of direct, indirect, and cumulative analysis. See response to comment 124-7.
ECOS Consulting	9	66	Page 4-454, 1st paragraph, 4.3.19.6: Do the numbers representing surface areas disturbed in the tables in Appendix S include disturbance from routes used to access these areas? If not, these must be included, and there must be and estimate of the amount of area impacted by indirect and cumulative impacts.	Appendix S of the DRMP/EIS includes the acreage of disturbance from projected oil and gas disturbance by wildlife habitat. The acreage of disturbance is based on 15 acres per well. Based on the Reasonably Foreseeable Development scenario for oil and gas in the Moab Field Office, the 15 acres of distubance includes the

				disturbance for well pad, access route, pipelines, and infrastructure. This language has been included in the anlalysis assumptions for oil and gas development in the PRMP/FEIS.
ECOS Consulting	9	67	Page 4-454, Alternatives, 4.3.19.6.1-4: None of the four Alternatives provide adequate viable habitat for large wildlife within the Moab Planning Area. In the analysis in this section only direct effects, and only the estimated number of directly disturbed acres, are considered in the impact analysis. This is a violation of NEPA. The BLM is required to analyze the indirect and cumulative impacts of these disturbances. In the Moab Planning Area in particular, downstream and wind erosion effects can be widespread and particularly harmful to soils, vegetation, and water. The BLM is well aware of these impacts because of the data from their water monitoring program, and because of the many accidents that have occurred on Interstate 70 due to increase in dust and sand storms in the Moab Planning Area. These storms have been directly related to surface disturbance and the loss of viable biological soil crust within the Moab Planning Area. These indirect and cumulative effects must be analyzed in the area, including NSO and closed areas, adjacent to impacted sites. This applies particularly to the loss if viable predator habitat for elk, mule deer, pronghorn, desert bighorn, and Rocky Mountain Bighorn sheep.	Chapter 2 of the DRMP/EIS identifies management protections for all the big game species habitats identified in the Moab Field Office. These habitats were delineated through coordination with the Utah Division of Wildlife Resources. The management include protections for pronghorn habitat, desert bighorn sheep habitat, Rocky Mountain bighorn sheep habitat, and deer/elk habitat. Throughout Chapter 4 of the DRMP/EIS the BLM discloses the impacts to wildlife resulting from the management actions in the different alternatives. See response to comment 124-7. See response to comment 9-11.
ECOS Consulting	9	68	Page 4-464, 1st paragraph, 4.3.19.8: This analysis does not consider the effect of roads and 4-wheel drive routes on wildlife habitat fragmentation. Habitat fragmentation is a primary cause of the loss of many wildlife populations and habitat throughout the world, in particular large mammals: predators and ungulates. It is recommended that the BLM analyze the direct, indirect, and cumulative effects of the density of roads it is recommending for each Alternative throughout the 1,800,000 acres of the Moab Planning Area. It is also	See response to comment 124-39, 124-140, 1025-14, and 1025-15.

			recommended that many of these roads/routes be closed and restored in order to provide habitat large enough to sustain viable populations of our large predators and hoofed mammals. These large areas must also provide migration routes and connectivity among sub-populations, unencumbered by the fragmentation effects of roads or 4-wheel drive routes, in order to ensure genetic mixing and species hardiness.	
ECOS Consulting	9	69	Page 4-464, 4th paragraph, 4.3.19.8.1: As cited in this Moab RMP, Stokowski and LaPointe (2000) list numerous negative impacts of roads/routes and OHV use on wildlife species and land degradation. This paragraph discusses the loss of wildlife habitat quality but barely mentions the fact that the complete loss of wildlife habitat quantity is also a major factor. Many wildlife species will completely abandon former habitat when there is a road or OHV route nearby, and the dust and disturbance created by designated and rogue OHV routes has contributed greatly to the degradation of adjacent wildlife habitat in the Moab Planning Area. When an agency cites a paper like the Stokowski and LaPointe paper, and proceeds to ignore all the conclusions about the negative environmental and social effects of roads and OHV's by not providing true Alternatives to the location and amount of roads/routes allowed, there is something terrible wrong. There is a major disconnect between the scientific findings regarding impacts and BLM's proposal to continue to providing for the special interest uses that cause the greatest damage to natural resources: livestock grazing, gas, oil, minerals, and OHV's.	See response to comment 124-39, 124-140, 1025-14, and 1025-15. Habitat fragmentation is caused, not by the routes themselves, but by use of the routes. In fact, one could argue that closing routes concentrates traffic, thus increasing wildlife habitat fragmentation. However, the BLM stands by its analysis of wildlife habitat fragmentation.
ECOS Consulting	9	70	Page 4-484, 3rd and 4th paragraphs, 4.3.19.18.2.3: Here is where the habitat fragmentation by roads/OHV routes has the highest impacts as far as the effect on a single significant species, the Desert bighorn sheep. From the BLM's own analysis, although there is at least	See response to comment 124-39, 124-140, 1025-14, and 1025-15. The imposition of a No Surface Occupancy stipulation on bighorn sheep habitat in Alt C is intended to improve

			128,832 acres of Desert bighorn sheep habitat, there is no place within the entire Moab Planning Area that meets the required minimum habitat patch size of 159 [square] km or about 62,000 acres (Singer et al. 2001). In patches smaller than 159 [square] km, Singer showed that sheep will not stay in the area, it is unsuitable habitat. The BLM attempts to downgrade these results by quoting anecdotal information from a BLM employee, saying not many vehicles go out into these areas. Has the BLM ever set up vehicle counters to measure how much visitation there is? If so, can we see the data? Does the BLM really know how much visitation is out there, or is it all an estimate, based on a couple of visits to the area? Does the BLM know how much disturbance, in the form of number of vehicles, is required for the disturbance to be negligible? Many of these "roads/OHV routes" go nowhere in particular, and are redundant relative to nearby roads/routes. It is recommended that the BLM act wisely and in the spirit of its mandates and commitments to maintain healthy wildlife populations, by eliminating and restoring many of these useless roads/routes. In Desert bighorn sheep habitat, it is recommended that the BLM eliminate 80% of all roads/routes that are ranked as "D roads". This will open up the habitat for viable populations of desert bighorn sheep and other wildlife species, and it would continue to provide access to much of the area by OHV and other users through the use of the "B roads" and state highways. If these roads/OHV routes are truly rarely used, and if they fragment and degrade wildlife habitat, and if the BLM is committed to providing suitable habitat for fish, wildlife, and special status species of plants and animals, then it is logical and reasonable for the BLM to	bighorn habitat by decreasing the amount of new habitat fragmentation. Over 100,000 acres are in the No Surface Occupancy category solely for the protection of this species.

			close most of the "D roads" that are in crucial wildlife habitat. A management action of this type is a win-win situation: re creationists will not be disappointed because these routes are so little used, and wildlife habitat will be in a functioning condition and managed properly. However, if the roads/OHV routes are not closed and restored, wildlife habitat will continue to degrade and remain fragmented, and the ecosystem will continue disintegrate in the future. Is this the future vision of this Moab RMP?	
ECOS Consulting	9	71	Page 4-483, Analysis of Impacts on Wildlife, 4.3.19.18.2.1: It appears that the roads/OHV routes planned in all Alternatives of the Travel Management Plan will also have a serious impact on Pronghorn antelope habitat. Causes of decline in pronghorn herds across the Southwest are numerous, but generally consistent. Paramount to the persistence of any wildlife species is the presence of quality un-fragemented habitat. The direct, indirect, and cumulative impacts of the "D roads" in particular, must be analyzed for this species.	The Moab Field Office manages over 353,000 acres of Wilderness Study Area. The routes in these WSAs have been closed to motorized travel in the Travel Plan accompanying the PRMP/FEIS. The WSAs provide large patches of unfragmented habitat within the planning areas. Many miles of route in pronghorn habitat have been closed in the Travel Plan accompanying the PRMP/FEIS. This action has reduced pronhorn habitat fragmentation in the Moab BLM planning area.
ECOS Consulting	9	72	The primary legislation for the management of BLM lands is by the Federal Land Policy and Management Act (FLPMA, 43 U.S.C. §§ 1701-1785). FLPMA prescribes sustained-yield management principles (43 U.S.C. § 1702 (c)), which apply to an open-ended list of "renewable and nonrenewable resources," including fish and wildlife, recreation, timber, range, wilderness, mineral, watershed, and natural, scenic, scientific, and historical values. Riparian areas are one of the few habitats where most of these values are found together. The act further directs BLM, in managing the public lands, "to take any action necessary to prevent unnecessary and undue degradation of the land" [43 USC §1732(b), FLPMA §302(b)]. This can easily be accomplished by closing riparian areas to resource destroying activities such as livestock grazing, OHV	The BLM adheres to all laws, regulations, policies, and Executive Orders pertaining to riparian areas. There is nothing in these rules that require the BLM to entirely close all riparian areas to resource uses.

			use, and mining activities. "Riparian/wetland habitats are fragile resources and are often among the first landscape features to reflect impacts from management activities. These habitats are used as indicators of overall land health and watershed condition. Some of the functions of a healthy riparian system include: filtering and purifying water as it moves through the riparian zone, reducing sediment loads and enhancing soil stability, reducing destructive energies associated with flood events, providing physical and thermal micro-climates in contrast to surrounding uplands, and contributing to ground water recharge and base flow" (BLM Riparian Area Management Policy, 1987). In addition to those laws embedded in the very foundation of BLM as a public land management agency (Taylor Grazing Act, 1934, Federal Land Policy and Management Act 1976, and Public Rangelands Improvement Act, 1978), the premiere authority which provides for the most protection of riparian/wetland and associated resources is the Clean Water Act of 1977. In response to the Clean Water Act, two central Executive Orders (Wetland and Floodplain) were signed under Presidential authority to protect riparian/wetland and associated floodplain and wildlife values. Relevant regulations, policy, and guidance relative to management of riparian/wetland resources include: *Executive Order (EO) 11988 (May 24, 1977), the Floodplain EO *EO 11990 (May 24, 1977), the Wetlands EO *EO 12088 (October 24, 1978), the Local Water Quality EO *EO 12962 (1995), Fisheries and Aquatic Ecosystems EO *EO 13186 (2001), EO in support of the Migratory Bird	

			Treaty Act of 1918 *Fundamentals of Rangeland Reform (1995), under 43 CFR 4180- Fundamentals of Rangeland Health and Guidelines for Grazing Administration (Standards and Guidelines) *National Riparian Area Management Policy (NRAMP, 1987) Establishes standards and technical methods for riparian area assessment and inventory. *National Cooperative Riparian Restoration Program (1996) Cooperative program between the BLM, USDA Forest Service, and NRCS" (BLM 2005). Considering the abundance of policy, guidance, and regulation concerning the importance of maintaining healthy riparian habitat; and since it is estimated that only about 10% of the original extent of riparian area remains in the southwest; and since riparian areas cover only 1-2% of the Southwest landscape, and less than 1% of the Moab Planning Area; and since riparian areas are among the most productive and ecologically important habitats in the Western United States; the BLM must manage what little remains for the maximum good of the American public. FLPMA prescribes sustained yield management principle, that the BLM is required to adhere to these principles, especially i regards to riparian area management. To that end, it would be advantageous for the BLM to focus particular attention on preserving and restoring all the riparian areas within the Moab Planning Area. If the riparian areas remain functioning and healthy, then adjoining uplands will likely follow. Thus, the BLM must manage the small percentage of riparian habitat that is in the Moab RMP project area, 0.75% of the total area, for the maximum benefit if renewable resources, and for the ecological benefit of surrounding areas. Renewable resources that the BLM should focus on	

			with riparian areas include fish and wildlife, vegetation, watersheds, water quality, water quantity, and natural, scenic, and wilderness resources, as well as non-motorize recreation, scientific, and historical values. These uses provide a wide variety of experience and opportunities for the widest diversity of public users, and contribute to persevering the proper ecological functioning of these rare riparian areas. Riparian areas have an extraordinary positive influence in adjacent uplands and thus, if in proper functioning conditions, will provide numerous additional benefits for all habitats.	
ECOS Consulting	9	73	Protect and Restore Specific Perennial and Intermittent Streams. The following perennial streams should have the highest priority for protection and management of riparian and wetland resources in this Moab RMP. These areas should also have the highest priority for habitat preservation, conditions assessment, trend monitoring, and habitat enhancement: 1) Beaver Creek 2) Burkholder 3) Castle Creek 4) Coates Creek 5) Colorado River 6) Cottonwood (Books) 7) Cottonwood (Black R.) 8) Cowskin Canyon 9) Coyote Creek 10) Diamond Creek 11) Dolores Creek 12) Fisher Creek 13) Floy Creek 14) Granite Creek 15) Green River 16) Hatch Wash 17) Hatch Ranch Wash 18) Hell Roaring	The streams referred to by the commentor are proposed for management in the alternatives for the DRMP/EIS based on Utah Riparian Management Policy (Utah State Instruction Memorandum No. UT 2005-091).

			19) Hunter Creek 20) Kane Creek 21) La Sal Creek 22) Little Dolores 23) Little Water 24) Mill Creek 25) Mill Canyon (West of Arches NP) 26) Muleshoe Creek 27) Nash Wash 28) Negro Bill Creek 29) Onion Creek 30) Pack Creek 31) Poverty Creek 32) Professor Creek 33) Rattlesnake Creek 34) Rill Creek 35) Ryan Creek 36) Salt Wash 37) Seven Mile (north) 38) Spring Creek 39) Ten Mile 40) Thompson Wash 41) Three Mile Wash 42) Trough Spring Creek 43) Tusher (Books) 44) Westwater Creek 45) White Wash Any areas with perennial or intermittent water, such as those listed above, must be managed for preservation because of their overall importance to humans, wildlife, fish, and sensitive and listed species.	
ECOS Consulting	9	74	Plan for Drought and Climate Change Drought and Climate change has had and will have major negative ecological impacts on the upland, riparian and floodplain areas, especially areas where livestock grazing and OHV use is still allowed; thus, the	On pg. 251 of the DRMP/EIS, the BLM identifies adaptive drought management criteria to be implemented during times of drought.

			DRMP must include drought-specific management for resource protection. "An issue of recent concern is the ongoing drought throughout the planning area. Since 1998, the planning area has suffered severe to extreme to exceptional drought conditions" (Utah Climate Center 2004). Drought has affected vegetation and soil moisture, with watershed health declining accordingly. Major decreases in the amount of ground cover, the vigor and diversity of plants, and soil moisture levels have been documented" (BLM 2005). Considering the current and projected drought problems the BLM must plan for the worst drought scenario as projected by the Utah Climate Center. This is extremely important for the new Moab RMP as it will dictate resource management for the next 10-20 years, and because drought will exacerbate and intensify any human caused impacts to the land, and in particular, to riparian habitat and wetlands.	
ECOS Consulting	9	75	Prohibit All OHV Routes in Floodplain and Riparian Areas. The BLM must prohibit OHV routes and OHV use in floodplain and riparian habitat. According to BLM's own assessment, "Road construction and maintenance in flood plains of perennial and intermittent stream systems is an important issue. Impacts to the associated riparian zone are related. Streams with major road conflicts include Onion Creek, Kane Creek, Ten Mile Creek, Bartlett Wash, Tusher Wash, Cottonwood Creek, Diamond Creek, and Westwater Creek" (BLM 2005). Due to the serious impacts of OHV routes and their influence I preventing many riparian areas from attaining Proper Functioning Condition, the BLM must not designate OHV routes in riparian and floodplain habitat. Most of the areas listed above were rated Functional at Risk with a downward trend a number of years ago. However the BLM has not followed up on much of its monitoring in order to look at	The Utah Riparian Management Policy (IM 2005-91) does not direct the BLM to close all existing routes within riparian areas.

			any trends. This can be easily remedied by simply closing the OHV routes.	
ECOS Consulting	9	76	Protect Areas with Wilderness Characteristics Exceptional protection and preservation efforts must be focused on riparian areas in "Non-WSA lands with Wilderness Characteristics", in "proposed wilderness" areas and in proposed "Wild and Scenic River" areas within the Moab Planning Area. These areas make up such a small fraction of the Moab Planning Area, yet are extremely important in maintaining the ecological integrity of these specially designated lands and their adjacent habitats. In particular, the BLM must protect the following riparian resources that are within "Non-WSA lands with Wilderness Characteristics" and in "proposed wilderness": 1) Beaver Creek 2) Cottonwood Canyon (Books) and tributaries 3) Cottonwood Canyon (Delores River) 4) Delores River 5) Diamond Canyon and tributaries 6) Fisher Creek 7) Granite Creek 8) Hatch Wash 9) Hell Roaring 10) Kane Creek 11) Kane Springs / Hunter 12) Kane Springs 13) Mill Creek and tributaries 14) Mineral Canyon 15) Nash Wash and tributaries 16) Negro Bill Creek 17) Onion Creek 18) Pritchett 19) Professor Creek 20) Rattlesnake Canyon and tributaries	See response to comment 124-53.

			21) Srping Canyon 22) Sections of the Colorado River 23) Sections of the Green River 24) Ten Mile Canyon 25) Tusher (Books) 26) White Wash These areas are all know for their regional superlative scenic, geologic, ecological, wildlife, fish, historic, cultural and recreational values.	
ECOS Consulting	9	77	What are the projected number of oil and gas projects for the next 10-20 years? Where will they be located? How much potential riparian habitat will be affected? These questions must be addressed in detail for an effective cumulative analysis of impacts.	The number of wells projected for the alternatives in the DRMP/EIS is based on the Reaonable Foreseeable Development scenario for oil and gas in the Moab Field Office. On pg. 4-4 of the DRMP/EIS, the number of wells is prorated based on restrictions included in the different alternatives. The numbers are projected across broad areas available for development under the different alternatives and the exact locations can not be specified. Riparian areas are excluded from development under all alternatives.
ECOS Consulting	9	78	Heightened Management for Invasions of Exotic and Noxious Species. Exotic species management must be a top priority for the BLM in riparian areas within the Moab Planning Area. The Moab BLM offices states: "Exotic and noxious species (namely tamarisk, Russian olive, and Russian knapweed) are now common within most riparian/wetland ecosystems along major river ways, and involve all types [of] restoration methods. Possibly the most devastating aspect of invasive exotic species is the cumulative alteration to an unhealthy riparian ecosystem; however the individual functions or processes which exotic species can alter include: *exotics often de-water riparian sites since they have deeper tap roots to out-compete natives for availability of water in acrid environments; *tamarisk secrete slat and increase soil and water salinity, resulting in reduced seed establishment of	The BLM is aware of the impacts associated with noxious and exotic weeds. There is an active program in place for monitoring and control of these species. This program involves adminstrative actions and policies that do not require land use planning decisions. The direction for treating exotic and noxious species is found in the Vegetation Treatments Using Herbicides on BLM Lands in Seventeen Western States (2007) found in Appendix U of the DRMP/EIS.

			native species, and reduced downstream water quality. This has severe economic impacts; *exotics compete for sun, space in narrow available habitats; *exotics reduce over bank flooding, decreasing establishment of nursery seed beds; *exotics have large numbers of seeds and long seed establishment periods (very prolific in comparison ti native species); *exotic communities have reduced bio diversity (significant decreases in numbers and types of associated biotic species including birds, bats, insects, amphibians ect); *exotic communities promote entrenched systems with highly destructive flooding energies which remain un dissipated within deep channels, resulting in high bank loss, sedimentation, and salinity" (BLM 2005).The control of exotic species is most effective if the agents of introduction are eliminated or reduced. The two most important factors contributing to the introduction and spread of exotic weeds are livestock grazing and roads (including OHV routes).	
ECOS Consulting	9	79	Protection of vegetation, Biological crusts, and Water must be the Highest Priority. Considering the extreme ecological importance of biological crusts, vegetation, and water in the arid environment of the Moab RMP Planning Area, we recommended that BLM's land management plans be centered around the maximum protection of these resoucres. The biological soil crusts and vegetation are what hold the ecosystem together, and the water is what drives all biological production processes. The primary legislation for the management of BLM lands is by the Federal Land Policy and Management Act (FLPMA, 43 U.S.C. §§ 1701-1785). FLPMA prescribes sustained-yield management principles, which apply to an open-ended list of "renewable and	The BLM adheres to all laws, regulations, policies, and Executive Orders pertaining to vegetation, biological crusts, and water resources. There is nothing in these rules that require the BLM to provide maximum protection of these resources. The commentor has not provided any specific information on where the BLM has failed to follow the rules regarding vegetation, biological crusts, and water in the land use planning process.

			nonrenewable resources," including fish and wildlife, recreation, timber, range, wilderness, mineral, watershed, and natural, scenic, scientific, and historical values. The act further directs BLM, in managing the public lands, to take any action necessary to prevent unnecessary and undue degradation of the lands. (43 USC §1732(b)). The DRMP should be guided by these mandates, because if a significant loss of either the biological soil crusts or the water resources should occur, then we would lose the capacity of the land to support all natural processes. We recommend that no activity or combination of activities be allowed that contribute to the destruction of either the soils or water resources over more than 10% of the total area of these resources within the Moab RMP Planning Area.	
ECOS Consulting	9	80	Provide a Wider range of Alternatives regarding Livestock grazing, Travel Management, and Mineral development activities. It is imperative that the BLM develop meaningful alternative for the Moab DRMP so that, in the spirit of FLPMA, analysis and decisions can be made that are based on true alternates for multiple use and sustained yield, and the recovery and protection of the long-tern health of the land can proceed into the future. BLM's mandate under the Federal Land Policy and Management Act of 1976 (FLPMA) is to manage the public lands for multiple use, while protecting the long-term health of the land. It appears that in developing the Moab RMP for the Moab Planning Area, the BLM is supporting livestock grazing, OHV recreation, and mineral development activities so blindly, that it is neither managing these lands for multiple use, nor is it protecting the land's long-term health, because it refuses to consider the well-documented and real devastating direct, indirect, and cumulative impacts of livestock grazing, OHV use, and mineral development	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. The BLM in developing the PRMP/FEIS can choose management from within the range of alternatives presented in the DRMP/EIS and create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple use mandate. See response to comment 124-7.

			on the soil, vegetation, and water resources. The National Environmental Policy Act (NEPA) of 1969 specifically provides instruction to the BLM and other Federal agencies for developing a range of reasonable alternatives in environmental impact statements. NEPA assures that the BLM (and other federal agencies) will consider the impact of an action on the human environment before decisions are made and the action is taken. The NEPA process is intended to help public officials make better decisions based on an understanding of environmental consequences, and take actions that protect, restore, and enhance the human environment. In this Moab DRMP, by not including a reasonable range of alternatives, and not dealing directly with the impacts of livestock grazing, OHV routes, and mineral development, the BLM is skirting the NEPA requirements that compel the agencies to concentrate on the significant issues that will seriously effect the protection, restoration, and enhancement of the human environment. Only by considering a full range of alternatives and the full direct, indirect, and cumulative impacts of these activities can the BLM make sound management decisions. The DRMP fails to acknowledge and assess the enormous adverse direct, indirect, and cumulative impacts of livestock grazing and OHV routes on the soils, vegetarian, stream banks and channels, and the riparian areas. The BLM must include an in-depth analysis of the historic ecological damage and how it has affected conditions in the field today, and develop preferred future conditions based on the actual potential of these lands. We say the "actual" potential because for too long the BLM has based conditions on how they have been over the past 100 years, which is probably very different from the potential natural conditions, due primarily to the short- and long-term adverse effects of	

			intensive livestock grazing.	
ECOS Consulting	9	81	Protect Wildlife Habitat by precluding roads and OHV routes that effect and Fragment Wildlife Habitat. For many of the large mammals, there is no place within the entire Moab Planning Area that meets the required minimum habitat patch size. The BLM can remedy this and much of the projected 60-80% migratory bird habitat loss by closing and restoring many of the roads/OHV routes that are not necessary. It is recommended that the BLM analyze each and every "D Road" planned in the various Alternatives. Each of these "D Roads" should have a specific purpose that is stated supported in the Moab RMP, and must minimize impacts to wildlife, including migratory birds, and their habitat. If the proposed OHV routes do not minimize the impacts or if there is no overwhelming reason that the route should ne used by OHV's, the route should be closed and restored. Many of these wildlife habitat-destroying roads have no real purpose. Thus, the BLM should scale back its intended extent of "D Roads" in all the Alternatives, and rely on the "B roads" for access to most areas. The "B Roads" go practically everywhere in the Moab Planning Area, so closing "D Roads" should not inhibit access to most areas. This strategy would eliminate much of the wildlife habitat fragmentation and destruction that is currently occurring in the Moab Planning Area.	See response to comment 9-71. See response to comments 124-39, 124-40, 1025-14, and 1025-15.
Foundation for North American Wild Sheep	11	1	The UFNAWS is deeply concerned that the proposed RMP does NOT adequately protect the Rattlesnake and Range Creek Bighorn herds from potential domestic sheep disease tranmission. UFNAWS has been involved with the BLM in converting three domestic allotments to cattle in this areas, and there are still at least two more allotments east of Floy Wash that currently have domestic sheep on BLM lands. This herd continues to expland to the east, and this RMP is supposed to be a futuristic plan.	The DRMP/EIS would not allow the reconversion of cattle allotments to sheep in bighorn habitat. Type of livestock is an issue that is usually addressed at the allotment permit renewal level. As these allotments are renewed, using Standards for Rangeland Health and Guidelines for Grazing Management, the class of livestock will be addressed.

Ride with Respect	122	1	The DRMP format frequently addresses the same points in different sections. Although our page references are not exhaustive, we request that changes be made consistent throughout the document. The DRMP format frequently addresses the same points in different sections. Although our page references are not exhaustive, we request that changes be made consistent throughout the document. Ride with Respect believes that the solution to managing motorized vehicle access is to provide diverse recreational opportunities with sufficient quantity and quality. The Draft plan could go further to this end.	The BLM has provided a wide range of diverse recreational opportunities within the alternatives of the DRMP/EIS. The Federal Land Policy and Management Act requires the BLM to manage public lands based on the principles of multiple use and sustained yield. Motorized recreation is but one element of multiple use.
Ride with Respect	122	2	Section 4.3.10 (page 4-192) mentions the National Visitor Use Monitoring Study for the Moab planning area asked visitors what their "main activity" while visiting Moab. This paragraph should make explicit that this study was not exclusive to BLM land, and probably includes substantial visitation to national parks and other areas. Beyond Table 4.67 (pg. 4-193), the entire study should be reproduced in the RMP, because of its significance for management and potential for misinterpretation.	The National Visitor Use Monitoring (NVUM) Study was conducted in the Moab Field Office in 2006 as a BLM pilot study by the U.S. National Forest Service. The study was, in actuality, exclusive to BLM visitation. See also response to Comment 124-2. The study is in draft form and for this reason it has not been included in the DRMP/EIS in its entirety. A draft of the study is currently available from the Moab Field Office. When the study is made final, it will be available from the Moab Field Office and will be posted on the U.S. Forest Service website.
Ride with Respect	122	3	Section 3.11.1.3 (page 3-80) estimates the relatively popularity of recreational uses in the Moab Field Office as of 2003. Since then, OHV riding has increased dramatically. So OHV riding should be categorized as "high use," at least on par with nature study. Also, the table should specify that these estimates are not based on empirical research. Appendix F should acknowledge that recreation area visitation is estimated without activity-specific	The BLM stands by its estimate that ATVing and dirt biking are in the "medium use" category. Observation, traffic counter data and preliminary National Visitor Use Monitoring (NVUM) Study data all support the fact that the activities listed in the "high use" category exceed ATV and dirt bike riding in the Moab Field Office. While the commentor provides no data to show that OHV riding has increased dramatically, the actual issue is whether or not ATV and dirt bike activity levels are "high" or "medium".

			monitoring data. That said, the best guess for Dee Pass (page F-7) is that current OHV use levels are light to heavy, not "light to moderate." This is also a more realistic use-level estimate for Utah Rims (page F-15).	The table to which the commentor refers has a note which clearly indicates that these are estimates by professional staff. The empirical data that are available to the BLM (traffic counter and NVUM data) support these estimates. The BLM makes no assertion that recreation activity levels are based on actual monitoring data. Traffic counter data and professional estimates by field staff were used to estimate use levels. On a year round basis, and throughout the week (i.e., not just on Saturdays), use levels in Dee Pass and in the Utah Rims area are light to moderate. The words "light" and "moderate" are relative, and the implicit comparison is to activity levels in areas nearer to Moab.
Ride with Respect	122	4	Section 4.3.10 generalizes the interests of recreationists based on their types of travel. BLM should dissect motorized use more fully. Motorcyclists prefer singletrack trails, ATV riders prefer ATV trails and four wheeling drivers prefer doubletrack more than improved roads. Converting roads to singletrack rarely satisfies two-wheeled trail users. Pg. 2-49 should be changed to read that singletrack would be created "in part" by converting existing inventoried routes not designated for motorized travel. Trials motorcyclists depend on small unrestricted areas. The National Management Strategy for Motorized OHV Use on Public Lands states that the BLM recognizes designated OHV recreation sites play a vital role in satisfying a portion of the recreation experience for OHV enthusiasts. The DRMP does not provide enough recreation sites for motorcycle trials and rock crawling.	The BLM has distinguished singletrack motorized routes from four wheel drive full sized vehicle routes in its travel plan formulation. During the scoping period, the public was asked to provide input on the inventory of motorized routes in the Moab Field Office. If these routes were verified by the BLM, they were considered for designation in one or more alternatives of the Travel Plan. While singletrack and four wheel drive routes were provided to the BLM during this period, no ATV routes were submitted. ATV travel in the Moab planning area occurs on full sized vehicle routes. Subsequent to the Record of Decision, the BLM could consider new travel proposals (including singletrack routes) on a case by case basis, subject to NEPA review. Pg. 2-49 offers the possibility that singletrack could be created by converting old routes to singletrack, with less new surface disturbance than would be required by a new route. The statement is not intended to preclude new route development. The BLM received no input during the scoping period regarding the public's desire for a trials motorcycle area. In Alt C, there are 1,866 acres of lands open to cross country travel. This acreage is available to all types of

				vehicles, including trials motorcycles.
Ride with Respect	122	5	Section 3.11.2.6 (page 3-85&6&7) addresses use conflict and displacement, but not adequately so. It crudely lists a few circumstances the agency believes to exist. The lists are arbitrary, and should be removed. For example, does Monitor and Merrimac really have unique conditions that make "conflicts between motorcycle users and mountain bikers" any more common than, say "ATV users and mountain bikers"? If not removed, the lists should at least disclose that its conflict assessment is based on personal experience, not empirical research or monitoring of any kind. Further they should include a wider array of examples to represent the scope of conflicts, including the following: Dee Pass - conflicts between motorcyclists and ATV riders Utah Rims - conflicts between motorcyclists and ATV riders Hidden Valley - conflicts between bicyclists and hikers Crystal Geyser - impacts of oil and gas industry on OHV trails Thompson Trail - impacts of ranching industry on OHV trails Sand Flats - impacts of BLM law enforcement on bicyclists Sand Flats - impacts of road improvement on OHV route connectivity	The list of recreation conflicts in Section 3.11.2.6 of the DRMP/EIS is based upon professional judgement of Moab Field Office BLM staff. The areas listed are those that have come to the attention of BLM staff due to reports of conflicts by users themselves. The sentence on pg. 3-86 of the DRMP/EIS has been changed to read: "specific areas in which BLM staff have had reports of user conflict and displacement include…" The BLM agrees that user conflict can occur between other groups and in other areas. The list of user conflicts on p.3-86 is intended to be illustrative of the fact that recreationists in the Moab planning area have conflicts with one another. The three areas of user conflict mentioned by the commentor (Dee Pass, Utah Rims and Hidden Valley) have not been reported to BLM staff. The three areas of resource conflict mentioned by the commentor do not follow the pattern of the listed resource conflicts on pg. 3-86 of the DRMP/EIS. Those resource conflicts state where recreation use impacts other resources. The commentor seeks to address the impacts of other resources on recreation use.
Ride with Respect	122	6	(Please refer to letter which quoted and attached: Recreational Trail Conflict: Achieving Equity Through Diversity (Koontz 2005). Applied to the Moab RMP, the above research could broaden and deepen its treatment of use conflicts. Ride with Respect supports many mitigation measures that can happen during implementation. We are pleased to read Table 2.1 Recreation (page 2-17), which plans to provide visitor	Implementation actions are issues that are addressed through administrative actions or policy. They do not require a land use planning decision (see pg. 1-11 of the DRMP/EIS). On pg. G-29 of the DRMP/EIS the BLM recognizes the actions that are necessary for implementation of the Travel Plan.

			information and outreach programs that foster a land ethic.	
Ride with Respect	122	7	For planning, we suggest highlighting one more critical item. Noise is the most common complaint against OHVs (American Motorcyclist Association 2005). Thus for all vehicles across the entire field office we recommend implementing and enforcing and 96-decibel limit based on the "20-inch" test (SAE J1287).	Specific decibel limitations on motorized vehicles are under the jurisdiction of the Environmental Protection Agency, and a matter of State Law. As stated in 43 CFR 8343.1(b): "No off-road vehicle equipped with a muffler cutout bypass, or similar device, or producing excessive noise exceeding Environmental Protection Agency standards, when established, may be operated on public lands."
Ride with Respect	122	8	Section 3.11.2.6 (pages 3-85&6) should insert the following paragraph: "Use conflicts can sometimes be resolved without separating uses. Managers can try a variety of mitigation techniques. If unsuccessful, displacement will occur in one of two ways. No restrictions will displace the less conspicuous use. Conversely, restrictions placed on the more conspicuous use will obviously displace that activity. Where mitigation fails, providing a quality alternative for one or both uses is key to resolving conflict." "	The DRMP/EIS does not seek to completely separate recreation uses. Focus areas have been established within Special Recreation Management Areas so that the BLM can emphasize opportunities for specific types of recreation. However, other uses are not precluded that are consistent with the Travel Plan. The majority of the planning area is not within a focus area, and there is no attempt to separate recreation uses in these areas.
Ride with Respect	122	9	Without providing alternatives, the supply for one or both uses will shrink, which leads to crowding. Crowding only intensifies use conflicts (Moore 1994). So the final RMP should also insert the following paragraph: "Where use conflict occurs, the BLM will take steps to mitigate the conflict and, if necessary, provide alternative opportunities for one or both uses."	The BLM attempts to provide recreation opportunities for many and diverse types of recreation. However, the Moab planning area has finite recreation resources and for the BLM to commit to providing alternative opportunities for all types of potential recreation uses is not realistic. Therefore a balanced multiple use approach, as required by FLMPA, is used to provide recreation opportunities.
Ride with Respect	122	10	Ride with Respect believes the draft travel plan falls short of providing adequate recreational opportunities, especially on mountain bike, motorcycle, and ATV trails. It is sensible to limit motorized travel to designated routes, plus inventoried roads for mechanized travel. Such an extensive restriction requires careful consideration of its impacts. Sections 3.11.1.2.16 and 3.17.2 (pages 3-79 and 3-158) estimate road mileage based on county inventories. They mention that	The BLM's travel plan formulation (see Appendix G of the DRMP/EIS) was based on a thorough inventory of routes for full sized, two wheeled vehicles, and mountain bikes. During the scoping period (June 4, 2003 to January 31, 2004), the BLM requested that the public submit routes for consideration for inclusion in the Travel Plan accompanying the DRMP/EIS. The BLM received submissions on dirt bike and mountain bike routes. No ATV route submissions were received. All routes

			"motorcycle routes" exist around White Wash. The document should specify that this includes motorcycle singletrack and ATV trails. Additionally, off-highway vehicle trails exist in high concentration from "Utah Rims" to Cottonwood Wash. Isolated OHV routes exist throughout the Moab field office, such as the Thompson Trail. Mountain bike trails also exist beyond those mapped in Alternative D.	received during the scoping period were verified by BLM staff on the ground. Those that were verified as "existing" routes were considered for inclusion in one or more of the alternatives for the Travel Plan. As described in Appendix G, the BLM's Travel Plan formulation involved numerous meetings of an interdisciplinary team. Potential resource conflicts were identified, their extent evaluated and then weighed against purpose and need for the particular route under discussion. Those motorcycle and mountain bike routes that did not pose undue resource conflicts are proposed for designation in one or more alternatives of the DRMP/EIS. Chapter 3 of the DRMP/EIS does not attempt to provide a complete description of every inventoried route. Each inventoried route (around 33,000) was assigned a number, and the resource conflicts associated with that route are listed in the GIS data base accompanying the DRMP/EIS . This information is available by request. In addition, Chapter 4 of the DRMP/EIS details the impacts of travel routes on natural and cultural resources.
Ride with Respect	122	11	Appendix G (page G-8) lists members of the Travel Plan Interdisciplinary Team, which includes no avid ATV or motorcycle rider. This lack of representation limits the ability to identify OHV opportunities and assess their value to that segment of visitors. To compensate, the agency should formally involve OHV leaders in developing the final RMP.	The function of the interdisciplinary team for travel management was to weigh purpose and need for the route against resource conflicts. The team included representatives from recreation, who stated the purpose and need for the motorcycle trails. Of the 129 miles of inventoried and verified single track, 123 miles were included in the preferred alternative (Alt C). The value of OHV opportunities were fully represented in the interdisciplinary team. Representatives of various interest groups (wilderness, OHV, utility, oil and gas, mining) do not qualify for cooperating agency status and are not formally included in the development of the PRMP/FEIS. The public, which includes OHV leaders, is involved throughout the land

				use planning process (see Chapter 5 of the DRMP/EIS). Comments from the public and user groups will be considered in development of the PRMP/EIS.
Ride with Respect	122	12	Appendix G (pages 12&13) also lists the criteria for determining routes for the travel plan. Absent from this list is route connectivity, route or area uniqueness, and any kind of diversity (such as encounter-types). To form the final travel plan, the agency should consider these criteria. Motorcyclists and ATV riders were not provided equal status in the Grand County travel planning process.	One of the criteria listed on pg. G-12 and G-13 for purpose and need for routes is "recreation opportunities and experiences". This general category includes the criteria mentioned by the commentator. Grand County was a cooperator in the development of the DRMP/EIS. How Grand County chose to structure its travel planning in preparation for its participation in the DRMP/EIS process is a matter for the county to consider.
Ride with Respect	122	13	Since 2005, Grand County endorsed a proposal by Ride with Respect to designate existing motorcycle singletrack known as Thompson Trail and Copper Ridge Motorcycle Loop. Despite county support, the BLM included virtually none of this proposal in its preferred Alternative.	Grand County was a full cooperator in the travel planning process. County representatives endorsed the Copper Ridge Area as a Mountain Bike Focus Area (called Klondike Bluffs Mountain Bike Focus Area). The county negotiated with representatives of that community to convert several routes in the area to non-motorized use. The Thompson Trail as proposed by Ride with Respect is contained in Alt D (pg. 2-49 of the DRMP/EIS), although subsequent NEPA analysis would be required. A modification to the Thompson Trail in Alt C was developed by BLM staff at the request of Grand County. This route is an alternative to the one proposed in Alt D. It presents lessened resource conflicts.
Ride with Respect	122	14	In the Moab field office, non-road mountain bike, motorcycle, and ATV trails were never inventoried. The only exceptions are roughly 15 square-miles around Bitter Creek and 100 square-miles around White Wash, which together comprise less than 5% of the field office. Grand County's Trail Mix Master Plan highlighted many popular bicycle trails, but was not intended as an inventory. Beyond the county roads, several hundred miles of trail exist, if not thousands. Short of performing an inventory of trails, Moab BLM	See response to comment 122-10. A route inventory was requested from the public during scoping. Trail Mix provided their inventory of mountain bike trails to the BLM during scoping. The Federal Land Policy and Management Act does not require complete and exhaustive inventories prior to land use planning efforts, but rather directs the BLM to plan with existing inventories.

			plans should at least acknowledge that they cannot fully measure the impacts to bicycling, motorcycling, and ATV riding in the absence of a trail inventory. To compensate for this, the agency should consider designating trail data provided during the planning process. Once the travel plan is implemented, BLM should practice adaptive management by testing mitigation techniques such as visitor education, signage, trail maintenance, and/or rerouting before prohibiting access. Further, the agency should prioritize the development of new bicycle, motorcycle, and ATV trails, with preference to SRMAs, and especially to the appropriate focus areas. Trail expansion would avoid pitting recreationists against one another on a rigid system of roads. By the same token, wide wash bottoms should remain open to all vehicles, instead of unduly restricting them to smaller vehicles.	There is a provision in the DRMP/EIS (pg. 2-48) for adding new routes to the Travel Plan once it is adopted. This will be accomplished through site specific NEPA analysis. Unrestricted travel in wash bottoms results in resource impacts as judged by BLM staff specialists. Concerns include destabilization of banks, accelerated erosion and use of wash bottoms by wildlife as travel corridors. In addition, observations indicate that some users do not remain in the wash bottoms, but leave them to return to the main travel routes. This results in cross country travel.
Ride with Respect	122	15	The Moab field office developed criteria for inventorying OHV trails when Clifton Koontz mapped White Wash OHV trails in 2001 and 2002 (refer to "OHV trail inventory criteria" on CD). It defined a "trail" as "any route that (1) is a continuous line void of vegetation and (2) can be followed by anyone with (i) a trained eye for OHV routes but (ii) no prior knowledge of the particular route in consideration. The 'trained eye' accounts for natural forces that may temporarily conceal portions of a route, such as water in active washes, wind over sand flats, free-thaw cycles of clay-rich soil, hoof prints on heavily grazed areas, as well as the inability of bare rock to record the passage of vehicles." The enclosed folder "agency definitions of existing trails" represent alternative definitions. By any of these definitions, many OHV trails exist in the Moab field office beyond the data from BLM, RwR, or any other known source. RwR's data is the best available information. All of the routes we submit currently exist,	Clifton Koontz was a short term volunteer for the BLM. His criteria for inventorying routes were never adopted by the BLM. The routes considered in the alternatives for the Travel Plan accompanying the DRMP/EIS were those submitted by the public during the scoping period, including those submitted by Ride with Respect, and verified on the ground by BLM staff (see pgs. G-15 through G-21). On pg. 2-48 of the DRMP/EIS there is a provision for adding new routes. The provision states “identification of specific designated routes would be initially established through the chosen travel plan accompanying the RMP and may be modified through subsequent implementation planning and project planning on a case by case basis”. New routes proposed by the commentor will be considered after completion of the Record of Decision for the Moab RMP unless those routes are in a closed area to OHV use. However, at the completion of the RMP, all travel will be restricted to the routes designated in the plan.

			and new data of existing routes includes photographs to aid your staff in verification. RwR expects that you to contact us before determining that any of these routes are not legal, existing travel ways. We urge you to discuss any other concerns you have about the submitted routes and areas. Feel free to request any further information or data. Please count all the trails RwR submits, including ones that we propose for closure, in the OHV trail mileage that your plan reports. The draft plan insinuates that travel is currently limited to existing roads and designated trails. Sections 4.3.16.1 and 4.3.16.2.6 (page 4-405 & 4-408 through 411) intend to measure the impact of action alternatives on travel management. As is, they fail to document changes in trail access. In particular, Table 4.126 indicates that in most of the field office travel is completely "open" or limited to existing roads and trails." The table appropriately reports the mileage of Class D county roads, which accurately represent the mileage of existing roads. However, for trails the table reports "Designated Motorcycle Routes" as 0 miles. Obviously the RMP should list the mileage of existing trails, just as it has done for existing roads. To do so, the table should consider all data submitted to BLM by November 30, 2007. The agency should include the mileage separately for routes submitted as ATV, motorcycle, or bicycle trails. Mileage should only be discarded if a particular route is (1) located in (a) an area limited to designated routes, (b) a closed area, © a WSA or is (2) proven to be (a) nonexistent, (b) nonexistent when the area became restricted to existing routes, or © virtually never used by the stated vehicle-type. Since no trail inventory was performed in 95% of the	At present, there are no motorcycle routes designated for single track motorcycle use by the BLM in the Moab planning area. Thus, Table 4.126 lists 0 miles of designated motorcycle routes. The BLM acknowledges that many user-made motorcycle routes exist in the planning area. On pg. 2-48, 129 miles of inventoried motorcycle routes are listed in Alt A. Table 4.126 is intended to show a comparison of OHV acreage designations by alternative. The miles of existing motorcycle route in the No Action alternative is not listed in this table. The table does show the miles of designated motorcycle routes that would be identified in Alts C and D. Section 202(c)(4) of the Federal Land Policy and Management Act states that the BLM shall “rely to the extent that it is available on the inventory of the public lands”. The Moab Field Office in formulating the alternatives for the Travel Plan relied on the best available data at the time of alternative formulation. This included route data that the BLM requested from the public during the scoping period. The complex task of formulating Travel Plan alternatives required individual analysis and verification of over 33,000 route segments. Within the DRMP/EIS (pg. 2-48) a process has been established to consider the addition of new routes to the Travel Plan. Route additions would not require a land use plan amendment but only site specific NEPA analysis. The new routes proposed by the commentor would require extensive amounts of time for field verification and analysis of purpose and need and resource conflicts. At this stage in the land use planning process, this amount of time cannot be expended if the land use plan is to be completed in a timely manner.

			field office, this tally would not even approximate the total trail mileage. Therefore, Table 4.126 should list minimum mileage, such as 50+ miles bicycle trail, 500+ miles motorcycle trail, and 50+ miles ATV trail. In lieu of an extensive trail inventory comparable to Grand County's road inventory, this is the only accurate way to report the planning baseline, and thus measure the impacts of each action alternative. Table 2.1 Travel Plan (2-48) suggests that Alternative A limits travel to "129 miles of inventoried motorized single-track." Switching from "limited to existing" to "limited to inventoried" requires that a complete inventory be performed for an area. Using RwR's data, you have a legitimate inventory of Dee Pass and Utah Rims Trail Systems. For the area that is contained by these trail systems, you could justifiably limit travel to inventoried trails. Elsewhere you can only limit travel to inventoried trails after thoroughly inventorying the area for OHV and bicycle trails. Considering new data on old trails is critical to making an informed decision. Existing trails that are newly submitted deserve the same designation as older data. That said, if it's impossible at this time, then new data should be given "provisional designation." RwR apologizes for the complexity of this presentation. To summarize, proper travel planning requires a route inventory. Otherwise, special consideration should be given to utilizing the best available information, regardless of its timing. Structural limitations of the BLM planning process inevitably lead to a draft plan which provides a sufficient system of roads, but a scarcity of non-road trails for an array of uses. Please work with trail users to finalize a plan which everyone can "live with."	

Ride with Respect	122	16	The Travel Plan appendix (page G-27) lists the considerations for travel plan amendment. The criteria should include "provide ample quantity and quality of diverse recreational opportunities."	The Travel Plan Appendix on pg. G-27 lists factors that would be considered for inclusion of new routes. One of the factors is "routes suitable for different categories of OHVs including dirt bikes, ATVs, dune buggies, and four wheel drive touring vehicles." This factor provides for potential diverse recreational opportunities.
Ride with Respect	122	17	Table 2.1 Travel Plan (2-48) states "Where the authorized officer determines that off-road vehicles are causing or will cause considerable adverse effects, the authorized officer shall close or restrict such areas." The term off-road vehicles should be substituted by "a particular type of use" to broaden management's ability to stop degradation from any activity.	The sentence referred to by the commentor is contained in the Federal Regulations at 43 CFR 8341.2. The BLM cannot alter the language of these Federal regulations.
Ride with Respect	122	18	Table 2.1 Travel Plan (2-48) should add the following statement: "Before prohibiting use, the BLM will attempt to mitigate problems through an appropriate combination of visitor education, directional signage, trail maintenance (including tread stabilization), law enforcement, or other methods of adaptive management."	The actions suggested by the commentor do not require a specific land use planning decision. These actions are specifically addressed in Chapter 1 of the DRMP/EIS (pg. 1-11), where "education, enforcement/prosecution, vandalism and volunteer coordination are listed as issues that are addressed through policy or administrative actions.
Ride with Respect	122	19	Table 2.1 Travel Plan (2-48) should add another statement: "BLM will invite individuals, organizations, and agencies to assist in land management projects and programs, such as route and facility maintenance, visitor education, and monitoring."	The BLM can utilize the resources of outside entities without a land use planning decision. This is specifically addressed in Chapter 1 of the DRMP/EIS (pg. 1-11), where "education, enforcement/prosecution, vandalism and volunteer coordination are listed as issues that are addressed through policy or administrative actions.
Ride with Respect	122	20	Section 3.11.2.7.1 states "The ability of OHV users to penetrate the backcountry where patrols are difficult may lead to secondary impacts to cultural resources from increased vandalism and theft." If by "penetrate" the BLM means travel on designated routes, the term should be replaced by "reach." If "penetrate" means travel off-route, then the sentence should begin "The physical ability of OHV users to travel off-route into the backcountry where..." Also, the following statement should be inserted: "Poaching cultural resources is	The statement in Section 3.11.2.7.1 that the commentor refers to does not distinguish between on and off road travel by OHV users. It mans that the ability to access the backcountry puts cultural resources at risk. This is true whether the travel is on or off road. See also response to comment 123-48.

			illegal. Therefore individuals who poach artifacts are constrained by the physical terrain more so than the legality of vehicular travel."	
Ride with Respect	122	21	Table 2.1 Wilderness & Travel Management (page 2-43 & 2-48) refer to WSA ways when stating that "If Congress designates the area as Wilderness, the routes will be closed." This sentence should be removed. Congress has final authority, so if they want to close ways, they can easily do so. However, prohibiting the option of cherry stems could prevent a Wilderness bill from passing. Furthermore, making cherry stem truncation a necessity pits Wilderness designation against those who utilize the current ways. Therefore, the agency should not constrain its options on this issue.	The sentence has been changed to read "If Congress designates the area as Wilderness, the routes could be closed." This sentence means that the will of Congress would override any route designation made in the DRMP/EIS. Congress does have the final authority, and close any route that it chooses.
Ride with Respect	122	22	Alternative C would require Special Recreation Permits for groups with “25 vehicles.” The document ought to explicitly exclude counting more than one vehicle per person, since he/she can only use one vehicle at a time. For example, without such a stipulation, the 25-vehicle rule would require a permit for a group of 9 friends who convene in Moab, each with a pickup truck carrying a motorcycle and bicycle.	The 25 vehicle rule is intended to mean the primary vehicle driven by the participant. The phrase "one driver/vehicle" has been added to the Special Recreation Permit decisions in the PRMP/FEIS for clarification.
Ride with Respect	122	23	Route terminology throughout the documents is carelessly applied. The terms "route," "road," and "trail" should be switched in many sentences. These terms have very different meanings. Routes include roads and trails. Roads are open to full-size vehicles. Trails are restricted to ATV, motorcycle, bicycle, horse, or foot use. Thus it's imperative to use proper terminology. The DRMP/EIS states on pg. 2-48 that "only designated roads are available for motorized commercial and organized group use." Further, the document periodically seems to treat the terms "OHV travel," "off-route travel," and "off-road	The term "route" is preferred by the BLM and has been used throughout the document. In many instances, the use of terms "road" and "trail" are in reference to regulations or policies that utilize the specific term. The BLM will carefully review the text of the PRMP/FEIS to clarify any misuse of terms. Route maps will be labeled as to the type of vehicles that are allowed. For example, single track motorcycle routes will be labeled as open only to two-wheeled vehicles. The words "and managed open areas" have been added to the appropriate section of the PRMP/EIS to clarify that permittees would be allowed in these areas.

			travel" interchangeably. Again these terms have distinct meaning that should be carefully chosen. OHV travel refers to any travel by OHVs, on or off of designated routes. Off-route travel specifically means travel off routes, usually by mechanized vehicles. Off-road travel refers to travel off roads, but can mean travel off or on designated routes. Therefore, "off-road travel" is a nearly useless terms that should be avoided entirely. The current treatment of these terms warrants an opportunity for stakeholders to review the final RMP for accuracy before it is implemented. RwR encourages the BLM to solicit proof-reading from various recreation and industry representatives. Here are a few examples of terminology misuse. Table 2.1 Travel Management (2-48) states "BLM could impose limitations on types of vehicle allowed on specific designated routes if monitoring indicates that a particular type of vehicle is causing disturbance to the soil, wildlife, wildlife habitat, cultural or vegetative resources, especially by off-road travel in an area that is limited to designated roads." The term road should be replaced by route in both instances. Table 2.1 Travel Management (2-48) also states "Only designated roads are available for motorized commercial and organized group use." The term road should be replaced by route. Furthermore, it should read "designated routes and areas." Otherwise, a commercial tour operator would be prohibited from crossing White Wash Sand Dunes, since no route is designated. Here are a few of the instances obscuring OHV travel from off-route travel. Section 3.14.2.2.1 (page 3-119) identifies "off-road travel" as a surface-disturbing activity. It should read "off-route travel." Section	UTVs are wider than 50 inches and would not be allowed on routes specifically restricted to those vehicles under 50 inches in width.

			3.14.2.2.2 identifies "OHVs" as contributing to accelerated erosion. Again the proper term is "off-route travel," since travel off-routes by any means could accelerate erosion. Further examples that should be corrected include 3.15.1.2.3.1.4 (page 3-16) which states that "prairie dog habitat is fragile and very sensitive to damage from OHV use" but should read "damage from off-route travel." Sections 3.17.2.3, 3.17.2.4, 3.17.2.6 and 3.17.2.7 (pages 3-158&9) all should refer to damage from "off-route travel" instead of "OHVs." Route terminology can help prepare for emerging activities. The OHV industry predicts that side-by-side or Utility Terrain Vehicles (UTVs) will become very popular in the coming years. These machines can be used appropriately on public lands. However, they pose a concern about trail widening, as do all other vehicles. UTVs are typically manufactured to be 55-inches wide, and are commonly modified to be 65-inches. Thus the Moab RMP should specifically regarded UTVs as full-size vehicles, and routes should be restricted by vehicle-width (ie "50-inch" trail, not "ATV" trail).	
Ride with Respect	122	24	Miscellaneous impacts of action alternatives should be revised. In suggesting revisions to Chapter 4, RwR is not necessarily supporting the actions. Rather we are trying to improve the accuracy of reports. Section 4.3.10.2.10.6 (page 4-220) should acknowledge that Labyrinth Rims in Alternative C would negatively impact motorcycling to the extent that it prohibits future use of Bartlett Slickrock by motorcycle.	Alt C of the DRMP/EIS provides an open area for bicycles only in the Bartlett Slickrock Freeride Focus area (166 acres) of the Labyrinth Rims Special Recreation Management Area. The general negative impacts of restricting cross country travel to motorized users is stated in Chapter 4 on pg. 4-409. The impacts of this restriction on motorcycling opportunities have been added to the text of the PRMP/FEIS.
Ride with Respect	122	25	Section 4.3.10.2.10.8 (page 4-220) claims Alternative B would be safer for bicyclists than Alternative C by closing Slickrock Trail to motorcyclists. This point should be removed, since bicycle-bicycle and motorcycle-motorcycle collisions are more likely than	The consequences of a motorcycle-bicycle collision are greater than that of a bicycle-bicycle collision because motorcycles are heavier and faster than bicycles. The BLM stands by its statement of increased safety for bicyclists by removing motorcycles from the Slickrock

			bicycle-motorcycle ones. Bicyclists can hear motorcyclists approaching, which gives them reaction time that is critical to preventing accidents.	Trail.
Ride with Respect	122	26	Section 4.3.10.2.10.12 (pages 4-223&4) alleges that the Moab ERMA benefits all recreationists because Alternative C would provide more recreational opportunities. Instead the section should state "All action alternatives significantly reduce motorized access by roads and trails, thus negatively impacting this form of recreation." Likewise Section 4.3.10.2.12 (page 4-229) should state that soil decisions substantially reduce vehicular access to certain environments, including high-saline soils, and both riparian and non-riparian washes.	The negative impacts to motorized users of restricting travel to designated routes is disclosed in Chapter 4 on pg. 4-409 and 4-410 of the DRMP/EIS under Travel Management rather than under Recreation. Text has been added to Chapter 4 of the PRMP/EIS acknowledging that soils and riparian decisions limit motorized users. The decision in soils has been changed so that soils are a limiting factor, rather than a factor that absolutely forbids new routes in saline soils.
Ride with Respect	122	27	Appendix G (page G-24) asserts that "the primary watershed concern identified in the RMP (1985) was the prevention and reduction of salinity and sedimentation from public lands. Unless trail-based recreation is documented to significantly increase salt transport, remove the statement "No additional OHV routes would be allowed in saline soils other than those already designated in the Travel Plan accompanying this RMP" (page 2-32). If graded roads are the only types of route in concern, retain the above statement by replacing "OHV routes" with "graded roads. Appendix G (page 24) also claims "Compaction of soils in these washes can lead to accelerated flood velocity, further contributing to erosion and sedimentary transfer." This seems counterintuitive. OHVs tend to loosen sediment in sand washes, not compact it. Even if some compaction occurred, how much could this effect large-scale flooding events? Please provide documentation of increased erosion resulting from OHV travel in washes, or remove the statement.	The BLM assembled an interdisciplinary (ID) team of resource specialists to assess the impacts of routes upon natural resources, including soils. The impacts to soils of new routes, including those in washes, was deemed sufficient by the ID team to lead to the plan decision regarding no new routes in sensitive soils.
Ride with Respect	122	28	Broadly speaking, the road plan provides sufficient road-based opportunities. So the final plan should add	All the alternatives for the Travel Plan provide a large number of routes which may be utilized by all types of

			and subtract some roads based on Alternative C. More of the existing roads surrounding Interstate 70 should be designated for long-distance touring. Compared to the road plan, motorized and mechanized trail designations are scarce. So the final plan should designate trails in Alternative D, plus others submitted by recreationists during this entire planning process. For all of the recreation conflict that the draft RMP purports, the travel plan in Alternative C does little to expand non-motorized opportunities. Several areas could provide substantial primitive opportunities by closing a few less-valuable roads. Homogeneity of the road plan would intensify conflicts and hurt all user groups in the long term. So the final plan should incorporate a subset of "wilderness character" or similar primitive designation from Alternative B.	motorized and mechanized recreationists. In Alt C, 282 miles of route have been provided specifically for motorcycles and 22 miles of route have been provided specifically for bicycles. Alt C of the Travel Plan provides a sufficient number of routes n the area surrounding Interstate 70 which could be utilized for long-distance touring. Alt D of the Travel Plan includes 3,855 miles of motorized routes and 345 miles of single track. These routes include those submitted by recreationists The BLM developed a variety of Special Recreation Management Areas (SRMAs), as well as a variety of Focus Areas to meet a variety of recreational needs including those for non-motorized users. This includes designation of hiking Focus Areas and non-WSA lands with wilderness characteristics. In addition Wilderness Study Areas (353,000 acres) are available for non-motorized recreation across all alternatives in the DRMP/EIS.
Ride with Respect	122	29	In the ERMA, Thompson Trail is unique by virtue of its sheer length and remoteness. Trail adoption by volunteers could preserve its singletrack character. Together with Thompson Wash and Copper Ridge Motorcycle Loop, Thompson Trail creates a unique route from the Sovereign Trail to Colorado. The Green River Gap and Browns Wash tie Colorado to the town of Green River. These singletracks should be preserved, along with adjacent doubletracks. Together such remote, rugged routes offer a chance to experience the desert like neither SRMAs nor graded roads can do.	The Thompson Trail as proposed by the commentor is included in Alt D of the DRMP/EIS, although additional NEPA documentation would be required prior to designation because the trail was not verified on the ground by the BLM. The proposed Copper Ridge Motorcycle Trail was also not verified on the ground by the BLM; it was not included in one of the alternatives in the same fashion as the Thompson Trail because of the inherent recreation conflict with the non-motorized focus area proposed for the area (Klondike Bluffs Mountain Bike Focus Area). The Green River Gap and Browns Wash trails were not proposed to the BLM during the scoping period for the land use planning process.

				The alternatives for the Travel Plan accompanying the DRMP/EIS designate existing routes. Future travel planning for new routes could be considered based on site specific NEPA analysis.
Ride with Respect	122	30	Kokopelli's Trail could be enhanced to create higher quality opportunities for motorized and non-motorized travel. Including Table 2.1 (pages 2-18&29) the RMP should pledge to construct a Kokopelli Singletrack and mark a Kokopelli Doubletrack that would roughly parallel one another. Through Utah Rims, the Singletrack should be open to motorcycles. Through Yellowjacket, the Singletrack should actually be an ATV trail. Everywhere else, the Singletrack should be non-motorized. The Doubletrack would generally follow the current trail, with revisions to achieve a rugged, backcountry opportunity.	The alternatives to the Travel Plan in the DRMP/EIS provide a reasonable range of routes for motorized use. Routes included in the alternatives for the Travel consisted solely of routes that already existed on the ground. The Travel Plan decisions could not include the myriad of possibilities for future new routes. Following completion of the Moab RMP, new routes could be considered for inclusion into the Travel Plan based on site site specific NEPA analysis. See also response to comment 122-15.
Ride with Respect	122	31	Northeast of Green River, the non-WSA lands surrounding Tusher Canyon have great potential for mountain bike trails. This northwest corner of the Bookcliffs has access roads, rims with sweeping views including Desolation Canyon, and relatively good soil development. Similar to bicycle trails in Fruita, a Tusher Canyon trail system would boost the economy of Green River, and dedicate quality trails for mountain biking.	There is essentially no recognized bicycle use in this portion of the Bookcliffs. Therefore, the BLM did not see any need to consider this area for a mountain bike Focus Area. The BLM does not consider this area as fulfilling a mountain bike recreation niche.
Ride with Respect	122	32	RwR generally supports establishment of Labyrinth Rims SRMA in Alternative C. However, the Dee Pass Motorized Trail focus area should be expanded beyond Alternative D eastward to the powerlines. The White Wash Sand Dunes OHV Open Area should be expanded by two square-miles beyond Alternative D (northward to Ruby Ranch Road and southward toward Red Wash Road). Fee programs should be determined with public involvement through a Resource Advisory Council (page 2-25) . Approximately twenty-five miles of the surrounding OHV trails are popular among ATV riders, and should be designated as such. The Dead	Expansion of the Dee Pass Motorized Trail Focus Area is not necessary to accommodate the motorized use currently taking place around the White Wash sand dunes. The White Wash Sand Dunes Open Area has been expanded to the west to accommodate the camping that occurs between the Ruby Ranch Road and the dunes themselves (see response to comment 120-83). The Dead Cow Loop (except for the low water alternative) is included in the Travel Plan for motorized use in Alt. C.

			Cow Loop could be designated with the exception of the "low-water" alternate, to reduce riparian impacts. The Tenmile Point area from Dripping Spring to Levi Well has relatively few routes and could be designated for non-mechanized focus. Tenmile Wash should be designated without speed limits, since speed has little influence on the biophysical impacts of travel (page 2-37).	The Travel Plan in Alt C of the DRMP/EIS did not identify specific routes for ATVs because none were proposed by the public during scoping. See response to comment 120-90 for discussion of ATV vs. motorcycle routes. All fee programs instituted in the Moab Field Office will follow the procedures outlined in the Federal Land Recreation Enhancement Act (see response to comment 208-5). The interdisciplinary team reviewing ACEC prescriptions identified excessive speed from motorized vehicles as an impact to the riparian values in Ten Mile Wash.
Ride with Respect	122	33	The southwest corner of Labyrinth Rims is a relatively primitive area, and should be managed to preserve this quality. Spring Canyon, Hellroaring Canyon, Spring Canyon Point, Deadman Point, and south Horsethief Point are best allocated as a non-mechanized focus. Motorized use there can be adequately accommodated by the Jeep Safari routes, plus a few choice spurs to overlooks. Closing the river road downstream from Spring Canyon would reduce recreation conflicts, while retaining access to Hey Joe Mine. Dubinky Wash is valuable for all vehicle use, and the singletrack near Jug Rock should remain available for motorcycles.	A BLM interdisciplinary team reviewed each route for purpose and need weighed against resource conflicts. See Appendix G for details on the Travel Plan development process. The resource conflicts on the routes mentioned by the commentor were not sufficient enough to close these routes in the preferred alternative.
Ride with Respect	122	34	North of Highway 313, the singletrack which drops off Hidden Canyon Rims is a key link for motorcyclists and bicyclists, alike. Bartlett Slickrock should remain open to motorcycling, since all of Tusher Slickrock will already be reserved for exclusively for bicycling. The Mill Canyon - Sevenmile Rim mountain bike area should be rotated to become Mill Canyon - Tusher Rims. Tusher has better bicycling potential than Sevenmile due to less sand, more slickrock, and fewer	The singletrack along Hidden Canyon Rims was inventoried, verified, and considered for designation in the Travel Plan. Due to resource conflicts (cultural), the route was not included in the Travel Plan accompanying the DRMP/EIS under any action alternatives. The Bartlett Slickrock is proposed as a freeride mountain bike area under Alt. C. Motorized use would be excluded to reduce conflicts with non-motorized users. This

			roads. Then Sevenmile - Upper Courthouse motorized backcountry touring area could be created to recognize the high-value roads that extend through Monitor & Merrimac to Big Mesa campground. Upper Sevenmile Equestrian Area should be expanded by four square-miles to include some terrain above the rim.	proposal recognizes that over 90% of the use is by bicycles. The uses referred to by the commentor in the Mill Canyon area can occur consistent with the Travel Plan regardless of the boundaries of the mountain bike Focus Area. The boundary of the Focus Area was delineated to reflect the heavier mountain bike use in the eastern portion of the area. Equestrian use is Sevenmile Canyon occurs almost totally within the canyon. There is no need to include terrain above the canyon on the rim in order to accommodate this use.
Ride with Respect	122	35	South of Highway 313, an additional bicycle focus area west of South Fork Sevenmile Canyon could provide cross-country and vehicle-assisted rides from the upper Gemini trailhead down to the switchbacks on Highway 313. The Gemini Bridges motorized backcountry touring area could be shifted to include all of Little Canyon Rim. The spur to Gemini Bridges should remain open to allow the unique experience of driving the bridge. Mountain bike alternates to the roads could be developed in this area, as proposed by Trail Mix. The Goldbar hiking area could be expanded further up Day Canyon, while only closing one spur road.	An additional biking Focus Area is not necessary to allow bicycles to use the route from the upper Gemini traihead to Highway 313. Motorized use is allowed on Little Canyon Rim consistent with the Travel Plan. The spur to Gemini Bridges is not identified under all action alternatives due to user conflicts and demonstrated resource damage. The mountain bike route proposed by the commentor does not currently exist. It could be added later based on site specific NEPA analysis. The Goldbar Hiking Focus Area includes the majority of Day Canyon. Hikers can continue to utilize the rest of Day Canyon under all alternatives.
Ride with Respect	122	36	The Klondike Mountain Bike focus area is a great foundation to develop mechanized singletrack. Most spur roads could be closed east of Bar M and Sovereign Trail areas. Still, the Sovereign ATV Loop should be permitted in its current location. The spur road contained within the Sovereign ATV Loop should be closed since it has little recreational value, yet invites four-wheeled users to poach the Sovereign Singletrack. Spur roads should also be closed north of the Copper Ridge Sauropod Trackway. Copper Ridge Motorcycle Loop is highly valuable to motorcyclists. Trail adoption	Some of the routes mentioned by the commentor are on State of Utah Land. The "Sovereign ATV Loop" does enter BLM lands, but it has been marked by users with no specific authority to do so from the BLM. The BLM routes in this area were not deleted from the Travel Plan because there were no specific resource conflicts. After the completion of the Travel Plan, these routes could be considered for closure on a case by case basis and site specific NEPA analysis. Some of the spur routes near the dinosaur trackway are

			could help to ensure enjoyment for mountain bikers, like the Sovereign Trail. And like the Sovereign ATV Loop, the Copper Ridge Motorcycle Loop could actually protect any non-mechanized trails that it surrounds by steering motorcyclists toward a legal alternative.	on the permitted Jeep Safari system; these routes have were determined to have a demonstrated purpose and need during the travel planning process. The Copper Ridge motorcycle loop was not verified by the BLM on the ground during the travel planning process. Therefore, it was not included in the baseline route inventory during the travel planning process. This route could be considered for inclusion in the Travel Plan at a later date based on site specific NEPA analysis.
Ride with Respect	122	37	RwR recommends designating Airport Hills as a managed OHV open area, with the boundary adopted from Alternative D. This location provides a small portion of Mancos Shale Hills that are distinct from the terrain around White Wash. An open designation would be flexible for a lease to adjust course routing for competitive events. The grey hills between powerlines and an airport make this use appropriate in terms of VRM.	The Airport Hills Motocross Focus Area (285 acres) is proposed only in the preferred alternative (Alt. C). The decision in this alternative is to manage the area for motocross use in conjunction with local government under a Recreation and Public Purposes Act lease. Under the terms of the lease, a course could be rerouted as necessary. The Mancos Shale in this area is not considered suitable for open cross country riding, as it is highly erodible and creates dust, a special problem in the vicinity of an airport.
Businesses/Orgs in Support of the Green River	407	1	The resegmentation of the Green River in the Moab Draft is not justified, explained, and is inconsistent with the segmentation of the Green River in the Price Draft RMP. The Moab Draft resegments the Green River in the preferred alternative (see Table 2.1 page 2-41). The rationale for this resegmentation is not explained nor justified anywhere in the Draft. Appendix J of the Draft documents the Wild and Scenic River Study process, including eligibility, tentative classifications, and the suitability study. Attachments 2 and 3 in Appendix J both have 6 segments of the Green River. These segments are consistent with the segments of the Green River in the Price Draft RMP.	The resegmentation of the Green River was done in order to find the proper river segments suitable that matched the goal of each alternative. The Moab and Price Field Offices will work toward consistency regarding the segment of the Green River from Swasey's Beach to the San Rafael River confluence.

			We urge the Moab Field Office to change the resegmentation of the Green River in the preferred alternative in Table 2.1 back to the original segments identified in the eligibility study (attachments 2 and 3 in Appendix J) and in alternatives B and D in Table 2.1.	
Businesses/Orgs in Support of the Green River	407	2	We are extremely concerned with the approach to suitability reviews provided in the Draft, due to the paucity of information provided in the suitability analysis, lack of justification for the conclusions reached regarding the suitability of the different segments, inaccuracies, and the failure to analyze the suitability of each segment independently.	See responses to 124-8 and 124-9. The administrative record (available upon request) provides additional information regarding suitability reviews
Businesses/Orgs in Support of the Green River	407	3	The West side of the Green River is managed by the Price Field Office and the East side is managed by the Moab Field Office. It is important that the decisions reached by the two offices regarding the Green river are consistent. The Price Field Office released its Draft RMP in July 2004, in which it recommended all segments of the Green River as suitable as Scenic or Recreational under the preferred alternative (See the Price Draft RMP for the complete recommendations). Unfortunately, the Moab Draft recommended that the stretch of the Green River from Swasey's to River Mile 97 is not suitable as a Wild and Scenic River. It is vital that the two BLM field offices are consistent in terms of their recommendations for the Green River as a Wild and Scenic River. The Moab Field Office must correct this inconsistency with the preferred alternative in the Price Draft and recommend that the entire Green River is suitable as Wild and Scenic River in the preferred alternative of the Draft.	The Moab and Price Field Offices will work toward consistency regarding the segment of the Green River from Swasey's Beach to the San Rafael River confluence. The PRMP/FEISs for each office will be in congruence.
Businesses/Orgs in Support of the Green River	407	4	The Green River qualifies for protection under the fishery and wildlife ORVs, the ecological ORV, the historic and cultural ORVs, the recreational ORV, and the geologic and scenic ORVs.	The BLM recognizes the outstandingly remarkable values of the Green River. The majority of the Green River is recommended for WSR status in Alt C. Those portions of the Green River that are not recommended are those with multiple private/state land use conflicts. The entire Green

				River is to be managed as No Surface Occupancy under the preferred alternative, regardless of whether or not it is found suitable for Wild and Scenic River status.
	408	1	The BLM must prepare a supplemental DEIS, taking into account a modified Alternative C, which would correct the following deficiencies in the DEIS. Failure to adequately discuss the impacts in proportion to their significance regarding the reduction of OHV access and the resultant increase in number of users/uses in the areas remaining available. The DEIS fails to adequately disclose the impacts that will occur as a result of increased use in the areas remaining available to OHV use. For example, failure to disclose the impacts related to the same and growing number of OHVs utilizing less area. Alternative B and C have 68 times more closed areas than currently exists yet the agency does not expect the number of users to fall. The DEIS fails to disclose the environmental effects of having the same number of users squeezed into 68 times less area. Federal regulations require the agency to discuss any adverse environmental effects which cannot be avoided should be proposal be implemented.	The commentor's assertion that Alternatives B and C have "68 times" the closed area as under current management is incorrect. The BLM believes that the commentor is confusing the "closed" category with the "limited" category. The commentor provides no evidence to support the contention that environmental damage will occur as a result of more users being "squeezed" into a smaller area. Nor does the commentor provide any evidence that the BLM has provided insufficient opportunities for OHV recreationists. The BLM acknowledges in the DRMP/EIS that all action alternatives will reduce OHV opportunities relative to Alternative A, but believes that sufficient opportunities will still be available.
	408	2	Failure to discuss the indirect effects and their significance on the travel plan and RMP direction regarding an increase in the number of acres designed closed or limited and regarding a decrease in the number of miles accessible for motor vehicle use. Federal regulations require the agency to include discussions of indirect effects, which are caused by the action and later in time or farther removed in the distance, but which are still reasonable foreseeable, including effects related to changes in pattern of land use and population density or growth rate. The DEIS has not discussed the indirect effect on areas which would be designated limited or open, when accommodating more users on less acreage. It is	The commentor offers no evidence to support the assertion that the BLM's efforts to accommodate more users on less acreage and fewer miles of routes will lead to adverse environmental impacts. The commentor's assertion is founded on an unsupported hypothesis that there will be insufficient space for anticipated increases in users, and that this concentration of use will lead to undesirable impacts. The BLM has assessed the impacts of travel management alternatives on a wide variety of resources in Chapter 4 of the DRMP/EIS, and concludes that additional restrictions on OHV use will have largely beneficial impacts.

			reasonably foreseeable that areas designated limited or open will be impacted by an increase in use caused when users are displaced from areas newly designated as closed or newly designated as limited where they had been open in the past. A court is likely to conclude that it, as well as the agency, can with high confidence say that the impacts are likely to occur. The agency can describe such impacts “now” with sufficient specificity to make their consideration useful. Furthermore, if the agency does not take them into account “now” it will not be able to take account of them before the agency is so firmly committed to the project that further environmental knowledge, as a practical matter, will prove irrelevant to the government’s decision. Commonwealth of Massachusetts v. Watt, 716 F2d 946, 952-53 (1st Cir. 1983). Therefore, the agency must consider the indirect effects and their significance on the travel plan and RMP direction regarding an increase in the number of acres designed closed or limited and regarding a decrease in the number of miles accessible for motor vehicle use in relation to the increased number of users/uses on such areas.	
Ride with Respect	122	38	Yellow Cat, Yellow Jacket, and Dome Plateau are worthy of SRMA designation. Yellow Cat and Yellow Jacket are densely roaded and increasingly popular among four-wheeled visitors, so they should have a motorized backcountry touring focus. Few adjustments are needed to the travel plan, except around Owl Canyon where road access should be preserved. A non-mechanized focus area could buffer the entire boundary of Arches National Park, wrap around Dome Plateau, and terminate near Dewey Bridge. Only a couple overlooks of Lost Spring Canyon and Dome Plateau are needed, but they should remain open all the way to the rim.	The recreation use in Yellow Cat is not at a high enough level to warrant a Special Recreation Management Area designation. The route in Owl Canyon was determined to lack purpose and need as an alternate route is available. Owl Canyon was identified with riparian values and was not identified with motorized travel. A Focus Area for hiking around Arches National Park is not warranted because it currently receives very low use. However, hiking can occur in this area regardless of its designation as a Focus Area.

Ride with Respect	122	39	Utah Rims SRMA ought to extend further southwest to the Cisco Road. From the Cisco Road to Cottonwood Wash, a mountain bike focus could lay the groundwork for bicycle trails. From Cottonwood Wash to the Westwater Road, a motorcycle focus would help preserve Mel's Loop and associated singletracks. From Westwater Road to the state line, several existing singletracks should be recognized in the travel plan, plus one ATV loop in the northeast corner of May Flat. A non-mechanized focus area could be expanded from the Westwater WSA further southwest all the way to private property. The entire spur road to Big Hole could be closed to enhance primitive characteristics. None the less, the Westwater Canyon overlook road should not be closed. Mechanized visitors should be granted at least one viewpoint of the place that their activities are prohibited from.	The core values of the Utah Rims Special Recreation Management Area are found within the boundary delineated under Alts B and C of the DRMP/EIS. With exception of the lands within the Westwater Wilderness Study Area, lands within the Moab ERMA, south and west of the proposed Utah Rims SRMA, are available for mechanized use consistent with the Travel Management Plan.
Ride with Respect	122	40	The Dolores Triangle includes a few remote areas where primitive character should be preserved. By closing two less-valuable spurs, Big Triangle substantially expands the Westwater roadless area to the north. Further south toward Buckhorn Draw, a few roads could be added to ensure that quality motorized opportunities exist in the Dolores Triangle as well. From Steamboat Mesa to South Beaver Mesa, another focus area should be designated for primitive recreation. Half of the Dolores River overlooks could be preserved as cherry stems. Also, a road on the southeast ridge of South Beaver Mesa lies outside of this focus area, and should remain open.	The routes in the Dolores Triangle were analyzed by the interdisciplinary team for Travel Plan designation. The routes mentioned by the commentor contained no specific resource conflicts that outweighed the purpose and need for the route. The alternatives for the Travel Plan accompanying the DRMP/EIS designate existing routes. Future travel planning for new routes could be considered based on site specific NEPA analysis. The Dolores River Canyons Special Recreation Management Area (SRMA) proposed in the preferred alternative (Alt C) would be managed to maintain primitive recreation opportunities. Since the entire SRMA has a single focus of management, there is no need for individual focus areas within the SRMA.
Ride with Respect	122	41	The Sand Flats Road traditionally connected trails such as Hells Revenge, Slickrock, and Fins 'N Things. Paving the road, and prohibiting OHVs from pavement,	Grand County paved the Sand Flats Road. In Grand County, non street legal vehicles are prohibited from travelling on paved roads. The BLM does not contradict

			has fragmented the trail system. Thus OHVs should be permitted to use Sand Flats Road from Hells Revenge exit to the end of the pavement. The new, reduced speed limit of 25mph should be preserved. A non-motorized lane should be constructed to parallel the road and reduce congestion. Additionally, the 1/4-mile slickrock route connecting Slickrock Trail with Fins 'N Things should be designated for two-wheeled use to alleviate traffic along the main road. All of these measures would make Sand Flats more user-friendly and manageable, without further impacts to the environment.	county law. The route mentioned by the commentor is considered cross-country travel and was never recognized as an existing route. Furthermore, the route was not proposed during the scoping period for the land use planning process and therefore was not considered in the Travel Plan process. The alternatives for the Travel Plan accompanying the DRMP/EIS designate existing routes. Future travel planning for new routes could be considered based on site specific NEPA analysis.
Ride with Respect	122	42	Special policies should continue permitting slickrock exploration. The Moab Field Office Off-Highway Vehicle Travel Map states that "Two-wheel motorcycles are allowed on established slickrock riding areas in the Slickrock Trail, Bartlett Wash and Tusher Canyon areas and on slickrock areas along the Monitor and Merrimac and Lower Monitor and Merrimac trails where such use does not further disturb vegetation or soils" (dated March 8, 2001 as part of emergency restrictions). In these areas, travel could be further restricted, but not so drastically as the draft RMP intends. Mechanized travel should still be allowed on any barren rock surface. Slickrock within one hundred yards of a designated route could remain open to motorized travel, except for Tusher Slickrock , which would be reserved for non-motorized use. This two-hundred yard corridor would accommodate the ways that people currently enjoy slickrock areas. For consistency, Slickrock Trail should appear on the map of designated motorcycle routes.	"Slickrock exploration" is the same as open designations where cross country travel is allowable. Open designations are used for intensive OHV use areas where there are no special restrictions or where there are no special resource protection needs, user conflicts, or public safety issues to warrant limiting cross country travel. Slickrock areas can include cultural resources, recreation conflicts, islands of soils and vegetation, and wildlife habitat. The impacts from cross country travel are documented in Chapter 4 of the DRMP/EIS. No open slickrock areas were proposed for motorized use during the scoping period for the land use planning process. The Slickrock Trail has been added to the map of motorcycle routes in the PRMP/EIS for alternatives C and D.
Ride with Respect	122	43	The Black Ridge area presents many potential recreation opportunities nearby Moab. The South Spanish Valley Mountain bike area could be extended to include part of Pole Canyon. This augments the variety of terrain, and provides enough room for a full-day's ride. Sweeping travel restrictions associated with	With the exception of trials motorcycling and cross-country rock crawling, all of the activities mentioned by the commenter can occur within the ERMA (which includes the Black Ridge area) consistent with the Travel Plan. Current recreation use in this area is low and does not warrant designation as an SRMA.

			the draft RMP warrant designating an area for specialized sports which depend on unrestricted areas. Durable and irregular terrain that is suitable for motorcycle and bicycle trials riding exists in Pole Canyon from the powerlines to Area BFE. In the same vein, a rock crawling area could be established on Black Ridge east of the powerlines. This area is littered with old mine roads, and is currently open to cross-country travel. The site could be limited to designated rock crawling routes, and adopted by local clubs. West of the powerline, the north flank of Black Ridge could be designated for equestrian use, as the backdrop to a residential area. The south flank could be a bicycle freeride area, since it provides one thousand feet of vertical relief, and graded roads for shuttling. Kane Creek is a dry wash from Highway 191 up to the Black Ridge Road. It should be open for OHVs to create a loop with Behind-The-Rocks while avoiding the highway.	Travel in Kane Creek poses cultural and riparian conflicts. For these reasons, this route was not identified for OHV use in the Travel Plan.
Ride with Respect	122	44	Cameo Cliffs SRMA should also be expanded for better OHV riding. The current boundary offers a meager half-day for the skilled rider. Extending the SRMA east to Big Indian Valley could still avoid mining activity. Shifting the boundary north to the Brown's Hole Road could still skirt the nearby residential area. The ATV trail immediately north of the OHV staging area should be designated for <50-inch vehicles, along with a couple miles of non-road trail above Hook & Ladder Gulch. While RwR generally agrees with mixes uses in a given SRMA, we believe that non-motorized opportunities should be developed in the adjacent Canyon Rims rather than Cameo Cliffs. Unnecessarily steering non-motorized use toward an established motorized trail system might create conflicts. Moreover, Canyon Rims has spectacular scenery, including some of the same geologic formations of Cameo Cliffs. The setting prescriptions and road plan for Canyon Rims are	When the Cameo Cliffs SRMA was created, the areas to the east were specifically excluded due to mining hazards. Although travel on routes outside the SRMA is available consistent with the Travel Plan, the designation of the area as an SRMA would encourage the public to this hazardous area. The Old Spanish Trail is recognized in the DRMP/EIS and various sites along it may be proposed for interpretation.

			better-suited for hiking and equestrian trails. If Cameo Cliffs contains an Old Spanish Trail site of particular interest, then it should be developed for interpretation and fairly accessible by full-size vehicles.	
Ride with Respect	122	45	Hatch Wash backpacking focus area could be expanded for better backpacking. Alternative C proposes to designate roughly twenty spur roads to the rim of Hatch Wash. However, only five are necessary to view most stretches of the canyon. Hatch Wash is a great opportunity for solitude seekers with easy access from the highway.	The Hatch Wash backpacking Focus Area was designed to include the prime backpacking opportunities within the Canyon. The routes mentioned by the commentor are on the rims of the canyon and were reviewed for purpose and need and weighed against resource conflict. There were no resource conflicts identified that outweighed purpose and need for the routes mentioned. Since all backpacking occurs below the rim the presence of the routes on the rim were not found to have a conflict with hiking in the canyon.
Ride with Respect	122	46	BLM's route designation process is not equitable among trail users. The process relied on aerial photography interpretation. It does not provide a system for non-full sized vehicle users. It ignores ROS, which could be applied in a linear fashion to provide greater fairness in the travel plan. Fairness could be achieved if the planners seriously considered the routes submitted by citizens, organizations and local government.	The BLM's travel plan provides opportunities for all types of motorized users. The preferred alternative (Alt C) provides 282 miles of single track motorcycle trails. These miles of trail are those submitted by the public, verified by the BLM on the ground, and designated under the preferred alternative. The BLM fully considered all routes submitted by the public, organizations and local government. While aerial photography was utilized in part for verification of full sized vehicle routes, on the ground field checks were undertaken on each of the submitted singletrack routes. There is no policy or direction for the BLM to utilize the Recreation Opportunity Spectrum (ROS) in the land use planning process.
Ride with Respect	122	47	Special Recreation Management Areas should be large enough to "grow into". Low use trails should be kept in the travel plan for those seeking solitude.	The BLM's Special Recreation Mangement Areas are proposed based largely on existing uses with consideration of potential future use. Many of the routes proposed in the alternaitves for the Travel Plan currently see very little use.

				See also response to comment 123-13.
Ride with Respect	122	48	Designating campsites should be done with public participation. The travel plan should be adjusted to access campsites.	Public participation has been provided throughout the land use planning process. One of the express purposes of leaving a route open for travel was its access to a campsite. If roads to specific dispersed campsites have been omitted in the Travel Plan, they may be added at a future date through site specific NEPA analysis. See also response to comment 123-8.
Ride with Respect	122	49	The Moab Extensive Recreation Management Area should provide roads, singletrack trails and dry washes to connect SRMAs and towns. The ERMA targets "backcountry driving" and "primitive hiking" as outcomes. We recommend targeting the ERMA for "an array of recreational opportunities.	The Extensive Recreation Management Area (ERMA) does provide a network of roads as well as some singletrack trails. For information on dry washes, see response to comment 122-14. The Moab Extensive Recreation Management Area (ERMA) identified in all alternatives of the DRMP/EIS recognizes several activities and specific targeted outcomes (see pg. F-9 and pg. 2-29). The listed outcomes do not preclude non-listed activities as long as they are consistent with the Travel Plan. The management guidelines for an ERMA are found on pg. C-16 of the Land Use Planning Handbook (H-1601-1) and states that actions in an ERMA are custodial only.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	1	Moab BLM's Travel plan designates motorized routes in areas with a non motorized setting. BRC understands that the planning team's intent is to have the Travel Plan "trump" (our word) the SRMA guidance.	Non-motorized focus areas are not intended to be managed as roadless. On pg. 2-18 of the DRMP/EIS in Management Common to All Alternatives, Focus Areas "are Recreation Management Zones for emphasizing particular types of recreation activities while still allowing for other uses in accordance with the Travel Plan". There are routes identified in the Travel Plan within non-motorized Focus Areas and these routes will remain available to travel.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	2	It is likely that some relatively small adjustments will be necessary to the Travel Plan. In addition, there is some guidance in the RMP which, in some areas, would allow the development of new travel routes should they be necessary.	The guidance concerning adjustments to the Travel Plan is outlined on pg. 2-48 of the DRMP/EIS. See also response to comment 208-8.

Colorado Off-Highway Vehicle Coalition (COHVCO)	123	3	There is no mention in the Moab DEIS regarding the obvious conflict in the Draft RMP's guidance and the Travel Plan. There is nothing to indicate the Travel plan will "trump" any other management prescription.	See response to comment 123-1.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	4	The BLM's Planning Handbook requires Field Offices to identify goal, settings, and targeted outcomes. The DEIS does this in Appendix F for SRMAs. In addition, the RMP outlines common management objectives for SRMAs in Chapter 2. The DEIS also outlines a general recreation policy in Appendix E. The Travel Plan is the final overlay. The Final Plan must address whether Recreation Settings will or will not "actually determine, what kinds of recreational opportunities are produced." Regarding the example above it is suggested that the BLM specifically state what the Recreational Settings are meant to be (e.g. "standards" or "guidelines") and to disclose how the Recreational Settings may or may not affect future management decisions, allowable uses, including and especially travel management.	Management actions that apply to all Special Recreation Management Areas (SRMAs) are found on pg. 2-18. Specific management actions for each SRMA are listed on pg. 2-18 through pg. 2-29. Appendix F provides more specifics on goals, settings, and targeted outcomes for each SRMA. Appendix E provides general recreation rules for the Field Office. The management actions proposed in these sections are complementary and in no case does one management action contradict the other. The recreation settings in Appendix F are descriptive and descripe the physical, social, and administrative environment. Definitions of these terms are provided on pg. F-1. The routes identified in the Travel Plan are available under all other management scenarios proposed in the alternatives of the DRMP/EIS such as ACECs, Wild and Scenic Rivers, SRMAs, Focus Areas, and non-WSA lands with wilderness jurisdictions. A sentence has been added to the PRMP/FEIS under Travel Management (Management Common to All Action Alternatives) for clarity that states "routes identified in the Travel Plan would be available regardless of other proposed management actions'. A detailed discussion of Recreation Settings and the benefits that may acrue to that setting is found on pg. 4-190 through pg. 4-193 of the DRMP/EIS. Recreation Settings for each Special Recreation Management Area (SRMA) are found in Appendix F.

				This Appendix it states that "for each SRMA the management goal is to provide for a variety of visitor benefits. In addition on pg. 4-192 it states that "Focus Areas' are Recreation Management Areas that promote specific recreational opportunities and activities while continuing to allow other recreational uses". On pg. 2-18, Focus Areas are defined as "emphasizing particular types of recreation activities while still allowing for other uses in accordance with the Travel Plan". See also response to comment 208-13.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	5	The DEIS is far from a model of clarity in distinguishing between program-level and project-level decision-making and management prescriptions. We urge BLM to clarify this distinction, and to specifically identify program-level management guidance from project-level management prescriptions for all management decisions, especially travel management.	The BLM followed the Land Use Planning Handbook (H-1601-1) to develop program level management guidance. In 2004, the Washington Office (WO) clarified the guidance in the handbook by issuing WO Instruction Memorandum 2004-005, which states specificially, "Selection of a network of roads and trails should be performed for all limited areas in each RMP. This requires establishment of a process that includes selecting specific roads and trails within the limited area or subarea and specifying limitations placed on use." The management decisions in Chapter 2 of the PRMP/FEIS will clearly show which decisions are planning decisions and which decisions are implementation (project-level) decisions.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	6	The current procedural model presents challenges, if not insurmountable hurdles, to the proper execution of these varied planning elements. The agency and public are unable to fully, if at all, utilize appropriate “tiering” in the planning process. The programmatic RMP and the site-specific Travel Plan are both “moving pieces” of the same puzzle and there is no refinement (in the Travel Plan) that can occur through the subsequent reflection on the RMP. Similarly lost are any benefits that might	Washington Office Instruction Memorandum 2004-005, states specificially, "Selection of a network of roads and trails should be performed for all limited areas in each RMP. This requires establishment of a process that includes selecting specific roads and trails within the limited area or subarea and specifying limitations placed on use." Utah State Office Instruction Memorandum 2004-008 instructs Field Offices to undertake travel planning in conjunction with the RMP planning in Utah.

			attend “amendment” of a programmatic RMP through a subsequent and more focused Travel Planning process that is procedurally distinct from RMP generation. The Moab planning team should consider the prospect of severing travel planning from the RMP process.	Utah State Office Instruction Memorandum 2004-061 further directs how to undertake travel planning within the RMP efforts in the state. The Moab Field Office followed the instructions of the State Office and Washington Office in designating routes within the RMP process.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	7	The Final Plan and ROD must more completely address routes which are subject to overlapping or concurrent jurisdiction, such as routes identified as county roads. The BLM's Draft Travel Plans do not contain references to agency guidance on route classification. The DEIS and Travel Plan do not specify if a route is a Road, a Trail, or a Primitive Road pursuant to agency directives. This seems to be inconsistent with agency guidance.	All routes identified in the alternatives of the DRMP/EIS for the Travel Plan are BLM routes. It is stated on pg. 1-12 that the RMP does not adjudicate, analyze, or otherwise determine the validity of claimed RS 2477 right-of-ways. The route names the commentor refers to were recommended in a BLM Washington Office Instruction Memorandum (IM) 2006-173, and will be applied to future route classification in the BLM's Facility Asset Management System. The implementation of this database requirement is still being refined and does not pertain to the identification of routes within the Travel Plan process.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	8	The BLM alternative assumes it will be able to completely change all vehicle based camping as currently available. This is a flawed approach due to the following: a) a regional prohibition on vehicle based camping does not absolve the agency of a duty to disclose and analyze the effects of camping on discrete, individual sites throughout the applicable region, b) it is impossible for the public and the decision makers to reasonably determine what affects each alternative will have on camping, c) there is no range of alternatives on the camping policy, and d) it is impossible to incorporate all the "spurs" necessary to provide access to many campsites resulting in areas where camping is nearly eliminated. A map is provided of the White Wash area which	On pg. 2-17 of the DRMP/EIS in Management Actions Common to All Action Alternatives, it states that dispersed camping is allowed where not specifically prohibited. Dispersed camping is allowed on over 95% of the Moab planning area. There is no regional prohibition against vehicle based camping; although vehicle based camping is restricted to designated sites in heavily used areas around Moab (about 5% of the area). These actions were initially prompted due to concerns regarding public health and sanitation raised by local health officials. In development of the alternative Travel Plans, all motorized routes considered during scoping were assessed for purpose need and weighed against resource conflicts. Recreation opportunities and experiences are listed as a purpose and need as specified on pg. G-13.

			displays an area where access to dispersed camping sites has been eliminated.	Dispersed camping was considered a recreation opportunity and experience. The interdisciplinary team, which included Grand County road officials, was very familiar with dispersed camp sites accessed by spur roads As stated in Chapter 4, pg. 405, of the DRMP/EIS, the BLM can modify or adjust designated motorized routes at the implementation and project-planning level. Therefore, specific spur routes to dispersed campsites can be added to the Travel Plan. The open area to the west side of the White Wash Sand Dunes has been enlarged to accommodate the camping that occurs to the south of the oil well. See also response to comment 120-83. Since dispersed camping is tied to the availability of identified spur routes, the range of alternatives for vehicle based camping is provided in the alternatives for the Travel Plan. Throughout Chapter 4 of the DRMP/EIS, the impacts to the resources affected by dispersed camping are analyzed. A statement will be added to Chapter 4 of the PRMP/FEIS in the section on the Impacts of Recreation and Travel on Social and Economic Conditions which states "Restrictions on dispersed camping and access routes to campsites may negatively affect those recreationists seeking this type of experience". Other than the White Wash area, the commentor has not provided any additional information regarding specific routes to dispersed camp sites that have allegedly been eliminated.
Colorado Off-Highway Vehicle Coalition	123	9	The agency should consider a policy that considers 1) interim camping rules that do not eliminate existing campsites; and 2) a process by which existing campsites are analyzed and determined to a) not cause	The BLM is unaware of any popular existing campsites that have been eliminated under the alternatives of the DRMP/EIS. Those specific campsites identified by the commentor at White Wash have been restored in the

(COHVCO)			considerable adverse effects; and b) managed in a way as to minimize impacts to natural resources.	preferred alternative (Alt C). A process in which to evaluate existing campsites for adverse effects or to minimize impacts to natural resources is not a land use planning level decision. This process will be addressed during development implementation plans for the Special Recreation Management Areas.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	10	BRC strongly opposes the fee system proposed for White Wash Sand Dunes in Alts C and D. A fee system at White Wash will be difficult to implement because of the distance from the Moab Field Office and ease of access to the Dunes and nearby trails. A fee system with the Federal Lands Recreation Enhancement Act. The BLM should remove the section requiring the Special Recreation Permit idea, and instead, insert guidance to pursue funding sources.	The possibility of a fee system for use of the open area in White Wash Sand Dunes is proposed in the DRMP/EIS as a means of funding the cost of the intensive management that this area would require to keep it open to cross country travel and provide services to visitors. Actual implementation of any new fee would follow the guidelines of the Federal Lands Recreation Enhancement Act, and be considered by the Utah BLM Resource Advisory Council. This action does not preclude pursuing other funding sources to help manage the White Wash Sand Dunes. For clarity the statement on pg. 2-25 of the DRMP/EIS has been changed to read "Implement a fee system under the guidelines of the Federal Lands Recreation Enhancement Act.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	11	There is no justification, no mandate in FLPMA and no process requirement for engaging in ongoing wilderness inventory and review. Once the "603 Process" was completed, the agency is done. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American People. Other than the management of existing WSA's the BLM should have no part in this issue. To do so is a tragic loss of management resources.	The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. .

				. .” (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. The BLM is aware that there are specific State laws relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA requires that BLM's land use plans be consistent with State and local plans “to the extent practical” where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved. The BLM will identify these conflicts in the FEIS/PRMP so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. Finally, the Utah v. Norton Settlement Agreement does not affect BLM’s authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land

				management process.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	12	Generally speaking, the DEIS assumes and concludes that reduction of OHV use within an area will provide a beneficial result on a particular issue. However, the DEIS fails to connect specific closures with site-specific data justifying the closure.	The BLM worked with an interdisciplinary team of resource specialists which included representatives from Grand and San Juan Counties to develop the alternatives for the Travel Plan in the DEIS/RMP. The ID team reviewed each route for purpose and need weighed against resource conflicts. These conflicts are identified route by route in the GIS data developed for the Travel Plan which is available in the administrative record. The impacts identified for travel management in the DRMP/EIS are derived from this data.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	13	In the face of growing demand through varied modalities for access to public lands, BLM must carefully consider how to make satisfying and diverse opportunities for visitation available, rather than excessively constructing more and different uses in a manner that will exceed the impacts of an even unmanaged status quo. It is not only legally required but logical to consider whether available "best science" truly supports possible management prescriptions.	In DRMP/EIS, the BLM has considered diverse opportunities for recreation and the potential conflicts with resources. The BLM has provided a wide variety of recreation opportunites for both motorized and nonmotorized uses. It is not possible for the BLM to envision all the possible recreation activities that may be developed in the future. The commentor has not provided any information about how the BLM failed to consider "best science".
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	14	The alternatives are not presented in a fashion that allows sufficient public involvement and participation. The DEIS fails to accurately describe the defferences in the various alternatives.	The BLM has followed the land use planning process and has involved the public throughout. The public participation process is outlined in Chapter 5 of the DRMP/DEIS. The public was afforded many opportunities for involvement. The BLM acknowledges that the planning process is complex requiring participants to look in many locations within the document to get the answers to questions they may have. This is why the BLM regulations require a 90-day a public comment period rather than the normal 45-day period for an Environmental Impact Statement. A comparison of the alternatives in the DRMP/DEIS is provided in Table 2.2.
Colorado Off-Highway Vehicle	123	15	The DEIS fails to accurately and sufficiently disclose the nature of the Travel Planning decisions and how that plan relates to RMP decisions. Indeed, the nature of	Refer to response to comments 123-4, 123-5, and 123-6.

Coalition (COHVCO)			the Travel Plan decision is not even addressed until Chapter 2.	
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	16	Issue 1 of the DEIS states "How can increased recreation use, especially motorized vehicle access, be managed while protecitng natural resource values?" The question has been answered, in large part, by BLM's national directives that require Field Offices to a "travel limited to designated roads, trails, and managed open areas." The agency has, in effect, modified the land use plan decision of "open" to "managed open". The alternatives should only differ in number of motorized routes and acres of managed open areas.	There commentor appears to have a misinterpretation of definitions. The Federal regulations at 43 CFR 8340.0-5 define an "open" OHV area as one "where all types of vehicle use is permitted at all times". These regulations also define limited as "an area restricted at certains times, in certain areas, or certain types of vehicular use. These restriction may be of any type." The BLM utilized these definitions in the land use planning process.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	17	Alternative B totally eliminates all dirt bike single track trails. It also totally eliminates the "dune riding" experience so popular at White Wash. Alt B provides even less opportunity for mountain bikers than Alt C. Alt B changes the use at White Wash from a popular OHV destination to an equestrian and hiking area. Alt D conversely does not eliminate any non-motorized opportunity or make any hiking areas in rockcrawling areas. It does put the Westwater area into an ERMA and the ERMA is non-motorized. These are among the examples of the manner in which the DEIS fails to present a reasonable range of Alternatives that respond to the issues. The range of alternaitives is inappropriately skewed toward significant closures to public access and vehicle-based recreation (Alt A - 4,673 miles, Alt B - 2,144 miles, Alt C - 2,519 miles, Alt D - 2,671 miles).	The White Wash area was determined to meet the criteria for an Area of Critical Environmental Concern (ACEC) and is proposed for designation in Alt B. The only recreation activities that are compatible with the management actions in the ACEC are non-motorized ones. Although cross-county OHV use is eliminated in Alt B, OHV travel is still available on identified routes. Alt D provides a larger open area for cross-country OHV travel and maintains the motorized focus areas while eliminating many hiking focus areas. However, hiking is not restricted anywhere on public lands. The Wilderness Study Area (WSA) in the Westwater Area is managed according to the Interim Management Policy for Lands Under Wilderness Review. This policy precludes motorized use except on identified routes. The remainder of the Westwater area outside the WSA is managed as an Extensive Recreation Management Area in Alt D. Travel in the ERMA is managed according to the Travel Management Plan (see pg. 2-29). As described in Appendix G, the BLM used an interdisciplinary approach, which included County road officials, in formulating the alternatives for the Travel Plan in the DRMP/EIS. All routes submitted during the scoping period were evaluated. A large number of routes were

				found to lack purpose and need (over 2,500 miles) which explains the relatively large span between Alt A and the action alternatives. The purpose and need of each route was weighed against potential resource conflicts which provided a spread across the action alternatives. These alternatives provide a broad range of management actions to address the issues raised during scoping.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	18	First Related Issue to Issue 1: Which areas should be designated as open, limited, or closed to OHV use, and which OHV routes should be designated within the limited category? Again, we'll emphasize that given the analysis in the MSA, eliminating the open area in a place that has been recognized as one of the most popular OHV sand dune destinations is not a reasonable way to respond to the issue. The proposed open areas in both Alternatives B and C present substantial problems. BRC agrees with the approach of the managed open area and has embraced the concept in our proposal in the next section. One more thing to emphasize, adjustment of the western boundary of the Open area will be critical, unless you want everyone to camp on the dunes.	The commenter is mistaken about the closure of the White Wash sand dunes in Alt C of the DRMP/EIS. The western boundary of the open area has been expanded to accommodate camping in Alt C. See response to comment 120-83.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	19	Third Related Issue: Where should adaptive management practices be applied in response to unacceptable resource impacts? The alternatives don't meaningfully respond to this issue. In candor, this doesn't seem to be a very good planning issue. Adaptive management practices might be applied in response to new management challenges or unacceptable outcomes on individual sites. This obvious reality is addressed within existing law and regulation and need not be identified or prioritized as a separate issue.	Although this issue was raised during scoping, the application in the DRMP/EIS is limited. Under Management Actions Common to All Alternatives, travel routes can be added or deleted from the Travel Plan based on public demand or unacceptable impacts to resources. This action would be based on monitoring and site specific NEPA analysis.
Colorado Off-Highway Vehicle	123	20	Fourth Related Issue: How should recreational uses be managed to limit conflicts among recreational users? The alternatives appear to answer this by creating	On pg. 1-11 of the DRMP/EIS, education is identified as an issue addressed through policy or administrative action and does not require a land use planning decision.

Coalition (COHVCO)			restrictive zones. We are disappointed BLM didn't include an Alternative that took USA-ALL's scoping suggestion to aggressively mitigate social conflict with education.	On pg. 2-17 of the document, the BLM acknowledges the need to provide visitor information and outreach as part implementation of the RMP. Also, as part of implementation a map will be provided to the public delineating where different recreation uses are emphasized.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	21	Fifth Related Issue: How should camping, human waste, fires, and wood collection be managed? Here all of the Alternatives fail miserably. There is no range of alternatives for vehicle based camping, only very slight variation among the various Travel Plan Alternatives. There is very little reference to impacts to the various resources when OHV and camping activities are restricted.	See response to comment 123-8.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	22	Sixth Related Issue: Where should Special Recreation Management Areas (SRMAs) be designated? As we mentioned above, Alternatives B and D's SRMA are so unworkable they do not present a reasonable range of Alternatives. Besides, again, this is not a very well crafted planning issue. SRMAs themselves do not fit into the definition of Planning issue (a matter of controversy or dispute over resources management activities or land use that is well defined or topically discrete and entails alternatives among which to choose or decide.	The BLM Handbook (H-1601-1) at C-15 specifies that the primary land use planning decision for recreation is the identification of Special Recreation Management Areas.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	23	Seventh Related Issue: How should conflicts with other, non-recreational uses be reduced? One option we would like to see in the Final Plan is a situation where the permitting process for oil and gas exploration/develop could benefit recreation by using the extensive environmental review to "clear" recreational routes or other infrastructure.	The permitting process for oil and gas operations is an implementation decision and involves site specific analysis of proposals on a case by case basis. The BLM can not require an oil and gas operator to conduct clearances on non-related actions.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	24	Eighth Related Issue: What management actions should be implemented to mitigate damage caused by recreational uses, including vehicles, on other resources and sensitive areas, especially riparian areas?	On pg. 1-11 of the DRMP/EIS, volunteer coordination is identified as an issue addressed through policy or administrative action and does not require a land use planning decision.

			Although we appreciate the direction to mitigate impacts to routes that are causing impacts (Appendix G), the most common management action BLM proposes is closure. As noted above, this is not a “range” of management options. Such an approach squanders a huge opportunity to leverage volunteer and OHV grant programs to assist in management or mitigate challenges, such as combining tamarisk infestation, or other such work. OHV groups can raise funds, just like hunting groups do, for wildlife guzzlers and other wildlife mitigations.	
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	25	Ninth Related Issue: How should recreation in the MPA be managed to ensure public health and safety? It is generally accepted that information is the primary tool to use in public health and safety. We are disappointed to see BLM adopt a ‘minimum management necessary’ concept, especially for recreational uses. We understand that we don’t want a “carsonite forest” out there, but at least one Alternative should have had a more robust directive to provide information to recreationists.	Education and information are identified on pg. 1-11 of the DRMP/EIS as issues addressed through policy or administrative action and do not require a land use planning decision. The analyses on pg. 4-3 of the DRMP/EIS assumes that there will be funding for implementation of the travel plan which will include public education, enforcement/prosecution, vandalism, and volunteer coordination.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	26	Tenth Related Issue: Where and under what circumstances should permitted recreation uses be available? PLEASE keep the group size limit at 50! The DEIS fails to provide sufficient need for the proposed change in Alternative C. We are at a loss to understand the agency’s rationale for this proposal. We strongly urge the BLM to, as much as possible, streamline the manner in which recreational “club rides” can be permitted. These clubs should be viewed as a resource. Especially in key motorized focus areas, we recommend the Final Plan include language that directs the manager to encourage cooperative efforts with OHV groups	The Federal regulations at 43 CFR 2932.11 allow the BLM to require special recreation permits (SRPs) for organized group activities when there are resource concerns, potential user conflicts, or public health and safety issues. The group size numbers vary by alternative based on the emphasis of the alternative and provide a reasonable range of choice. These numbers are based on professional judgment and extensive monitoring of motorized use in the planning area. The lower the threshold for when a SRP is required the greater the opportunity for increased contact and educational outreach with groups. More frequent contact would allow for more sustainable recreation use. The BLM recognizes the benefits of working with clubs and user groups and will seek to streamline permitting wherever possible.

Colorado Off-Highway Vehicle Coalition (COHVCO)	123	27	Divide Labyrinth Rims into two SRMA's: Gemini Bridges SRMA and Labyrinth Rims SRMA. The rationale for this is based on a subtle difference in landscape and more significant difference in use pattern.	The BLM recognizes that Labyrinth Rims/Gemini Bridges Special Recreation Management Area is a large area with diverse use and terrain. These factors will be considered during the development of the implementation plan for the SRMA.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	28	Utah Rims SRMA. Manage Utah SRMA for a variety of visitor benefits, provide opportunites for a) quality scenic trail-based motorcycling and mountain biking experiences; b) quality camping experiences; c) quality horseback riding experiences on existing routes. Please seriously consider Ride with Respect's proposal on Utah Rims.	See response to comment 122-39.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	29	BRC supports RwR's proposals: Additional bicycle focus area. RwR proposes South of highway 313, an additional bicycle focus area west of South Fork Sevenmile Canyon could provide cross-country and vehicle assisted rides from the upper Gemini trailhead down the switchbacks on Highway 313. The Gemini Bridges motorized backcountry touring area could be shifted to include all of Little Canyon Rim. The spur to Gemini Bridges should remain open to allow the unique experience of driving the bridge. Mountain bike alternates to the roads could be developed in this area, as proposed by Trail Mix. The Goldbar hiking area could be expanded further up Day Canyon, while only closing one spur road.	See response to comment 122-35.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	30	BRC supports RwR's proposals: Additional "Yellow Cat" SRMA. RwR proposes Yellow Cat, Yellow Jacket, and Dome Plateau are worthy of SRMA designation. Yellow Cat and Yellow Jacket are densely roaded and increasingly popular among four-wheeled visitors, so they should have a motorized backcountry touring focus. Few adjustments are needed to the travel plan, except around Owl Canyon where road access should be preserved. A non-mechanized focus area could buffer the entire boundary of Arches National Park, wrap around Dome Plateau, and terminate near Dewey	See response to comment 122-38.

			Bridge. Only a couple overlooks of Lost Spring Cnayon and Dome Plateau are needed, but they should remain open all the way to the rim. A Yellow Cat SRMA seems one of those 'no brain'ers' and we are at a loss to understand why it wasn't in the alternative that was supposed to (but did not) emphasize motorized recreation. Clif's idea is a well conceived and well balanced proposal. It deserves serious consideration.	
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	31	BRC supports RwR's proposals: New "Black Ridge" SRMA's. RwR proposes the Black Ridge area presents many potential recreation opportunities nearby Moab. The South Spanish Valley Mountain Bike area could be extended to include part of Pole Canyon. This augments the variety of terrain, and provides enough room for a full-day's ride. Sweeping travel restrictions associated with the draft RMP warrant designating an area for specialized sports which depend on unrestricted areas. Durable and irregular terrain that is suitable for motorcycle and bicycle trials riding exists in Pole Canyon from the powerlines to Area BFE. In the same vein, a rock crawling area could be established on Black Ridge east of the powerlines. This area is littered with old mine roads, and is currently open to cross-country travel. The site could be limited to designated rock crawling routes, and adopted by local clubs. West of powerline, the north flank of Black Ridge could be designated for equestrian use, as the backdrop to a residential area. The south flank could be a bicycle free ride area, since it provides one thousand feet of vertical relief, and graded roads for shutting. Kane Creek is a dry wash from Highway 191 up to the Black Ridge Road. It should be open for OHVs to create a loop with Behind-The-Rocks while avoiding the highway. BRC strongly encourages the BLM to consider this proposal. All too often, the agency is in the position of	See response to comments 123-13 and 122-43.

			responding, usually too late with too few resources, to emerging uses. This proposal is an opportunity to provide for existing uses and growth in popularity, in a controlled and environmentally sound manner. The BLM should not pass this opportunity up. Please refer to RwR's formal written comment for more info.	
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	32	BRC supports RwR's proposals: This is a shocker. BRC actually supports the general concept of RwR's proposed expanded backpacking focus area in Hatch Wash. Hatch Wash backpacking focus area could be expanded for better backpacking. Alternative C proposes to designate roughly twenty spur roads to the rim of Hatch Wash. However, only five are necessary to view most stretches of the canyon. We support the additional backpacking focus area, but disagree only slightly with Clif's determination only 5 overlook spur roads are necessary. During peak visitation season, 5 may not be enough. In fact, we are almost positive 5 are too few, but are unsure how many are actually used during peak seasons. BRC suggests close consultation with San Juan County and recommends the BLM defer to their assessment of how many of these overlooks are needed.	See response to comment 122-45.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	33	BRC supports RwR's proposals: Expanded Cameo Cliffs SRMA. RwR proposes Cameo Cliffs SRMA should also be expanded for better OHV riding. The current boundary offers a meager half-day for the skilled rider. Extending the SRMA east to Big Indian Valley could still avoid mining activity. Shifting the boundary north to the Brown's Hole Road could still skirt the nearby residential area. This proposal seems only prudent, and we agree with Clif's assessment that the area is a bit short on quantity of opportunity. Half day ride, maximum.	See response to comment 122-44.
Colorado Off-Highway Vehicle	123	34	The trail known as "the Tubes" or "Dead Cow Wash"; BRC differs with RwR and recommends keeping all of the existing routes in the area of this loop available for	The BLM considered this trail during the travel planning process. The main loop is identified for motorcycle travel under Alt C (preferred alternative). Several of the side

Coalition (COHVCO)			motorized use.	routes of this main trail had riparian resource conflicts. These resource conflicts were considered to outweigh the purpose and need for the trail.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	35	The second difference between BlueRibbon and RwR is White Wash Sand Dunes. The rationale for our proposal here is that it will be relatively easy to implement because it mirrors, or more accurately, freezes, the existing use and the boundaries are on easily recognized roads. It also incorporates the interim management philosophy by providing direction (objectives) to implement a RAMP.	The BLM Manual at 8342.1 identifies protection requirements for OHV designation. The following resources must be considered in the designation process; cultural, historical, archaeological, soil, water, air, scenery, vegetation, wildlife, wildlife habitat, threatened or endangered species, and wilderness suitability. The larger open area proposed by the commentor poses conflicts with many of these resources. The boundary of the open area at White Wash has been expanded to the west to accommodate dispersed camping. The BLM asserts that the boundaries of the open area in Alt C (preferred alternative) can be adequately delineated for public understanding.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	36	BRC believes a short trail should be included in the Travel Plan. It is commonly known as “the High Teck” trail, described below. Specific Route Suggestions: The Hi Teck Trail should be open to motorized use. The Hi Teck trail is shown on page 40. This trail was featured in several UTMA club rides often led by Joel Frulli, from Denver, Colorado. Please consider incorporating this trail into the final Travel Plan.	The trail referred to by the commentor was considered during the travel planning process. Conflicts with desert bighorn sheep escape terrain outweighed the purpose and need for the trail in all action alternatives in the DRMP/EIS.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	37	BRC supports RwR’s proposals: The Klondike Mountain Bike focus area is a great foundation to develop mechanized single track. Most spur roads could be closed east of Bar M and Sovereign Trail areas. Still, the Sovereign ATV Loop should be permitted in its current location. Spur roads should also be closed north of the Copper Ridge Sauropod Trackway. Copper Ridge Motorcycle Loop is highly valuable to motorcyclists. Trail adoption could help ensure enjoyment for mountain bikers, like the Sovereign Trail. And like the Sovereign ATV Loop, the Copper Ridge Motorcycle Loop could actually protect any non-	Refer to response to comment 122-36.

			mechanized trails that surrounds by steering motorcyclists toward a legal alternative. Based on knowledge of this area, the Copper Ridge Motorcycle Loop serves a critical “connector loop” that brings riders north enough to either connect with the Thompson Trail or loop back around to the staging areas. We strongly suggest consideration of this route.	
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	38	BRC supports RwR’s proposals: Likewise, Kokopelli’s Trail could be enhanced to create higher quality opportunities for motorized and non-motorized travel. The RMP should pledge to construct a Kokopelli Single-track and mark a Kokopelli Double-track that would roughly parallel one another. Through Utah Rims, the Single-track should be open to motorcycles. Through Yellowjacket, the Single-track should actually be ATV trail. Everywhere else, the Single-track should be non-motorized. The Double-track would generally follow the current trail, with revisions to achieve a rugged, backcountry opportunity.	See response to comment 122-30.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	39	BRC supports RwR’s proposals: Northeast of Green River, the non-WSA lands surrounding Tusher Canyon have great potential for mountain bike trails. This northwest corner of the Bookcliffs has access roads, rims with sweeping views including Desolation Canyon, and relatively good soil development. Similar to bicycle trails in Fruita, a Tusher Canyon trail system would boost the economy of Green River, and dedicate quality trails for mountain biking.	See response to comment 122-31.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	40	BRC supports RwR’s proposals: North of Highway 313, the single-track which drops off Hidden Canyon Rims is a key link for motorcyclists and bicyclists, alike. The Mill Canyon – Sevenmile Rim mountain bike area should be rotated to become Mill Canyon - Tusher Rims. Tusher has better bicycling potential than Sevenmile due to less and, more slick rock, and fewer roads. Then Sevenmile – Upper Courthouse motorized backcountry touring area could be created to recognize	See response to comment 122-34.

			the high-value roads that extend through Monitor & Merrimac to Big Mesa campground. Upper Sevenmile Equestrian Area should be expanded by four square-miles to include some terrain above the rim.	
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	41	BRC supports RwR's proposals: The Dolores Triangle includes a few remote areas where primitive character should be preserved. By closing two less-valuable spurs, Big Triangle substantially expands the Westwater roadless area to the north. Further south toward Buckhorn Draw, a few roads could be added to ensure that quality motorized opportunities exist in the Dolores Triangle as well. From Steamboat Mesa to South Beaver Mesa, another focus area should be designated for primitive recreation. Half of the Dolores River overlooks could be preserved as cherry stems. Also, a road on the southeast ridge of South Beaver Mesa lies outside of this focus area, and should remain open.	See response to comment 122-40.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	42	BRC supports RwR's proposals: The Sand Flats Road traditionally connected trails such as Hells Revenge, Slickrock, and Fins 'N Things. Paving the road, and provhibiting OHVs from pavement, has fragmented the trails system. Thus OHVs should be permitted to use Sand Plats Road from Hells Revenge exit to the end of the pavement. The new, reduced speed limit of 25 mph should be preserved. A non-motorized lane should be constructed to parallel the road and reduce congestion. Additionally, the ¼ mile slick rock route connecting Slickrock Trail with Fins N' Things should be designated for two-wheeled use to alleviate traffic along the main road. All of these measures would make Sand Flats more user-friendly and manageable, without further impacts to the environment.	See response to comment 122-41.
Colorado Off-Highway Vehicle Coalition	123	43	BRC supports RwR's proposals: Special policies should continue permitting slick rock exploration. The Moab Field Office Off-Highway Vehicle Travel Map states that "two-wheeled motorcycles are allowed on established	See response to comment 122-42.

(COHVCO)			slick rock riding areas in the Slickrock Trail, Bartlett Wash and Tusher Canyon areas and on slick rock areas along the Monitor and Merrimac and Lover Monitor and Merrimac trails where such use does not further disturb vegetation or soils" (dated March 8, 2001 as part of emergency restrictions). In these areas, travel could be further restricted, but not so drastically as the draft RMP intends. Mechanized travel should still be allowed on any barren rock surface. Slick rock within one hundred yards of a designated route could remain open to motorized travel, except for Tusher Slickrock, which would be reserved for non-motorized use. This two-hundred yard corridor would accommodate the ways that people currently enjoy slick rock areas.	
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	44	BRC supports RwR's proposals: In the ERMA, Thompson Trail is unique by virtue of its sheer length and remoteness. Trail adoption by volunteers could preserve its single-track character. Together with Thompson Wash and Copper Ridge Motorcycle Loop, Thompson Trail creates a unique route from the Sovereign Trail to Colorado. The Green River Gap and Browns Wash tie Colorado to the town of Green River. These single tracks should be preserved, along with adjacent double tracks. Together such remote, rugged routes offer a chance to experience the deserts like neither SRMAs nor graded roads can do.	See response to comment 122-29.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	45	The Moab BLM ERMA has decidedly non-motorized focus, with Targeted Outcomes being Backcountry driving and primitive hiking, backpacking and equestrian use. But the MSA clearly shows the proposed ERMAs to house a myriad of activities, including OHV trail riding, hunting and mountain biking. We recommend the BLM revise its management guidelines to provide for settings that are compatible with all existing uses.	The Moab Extensive Recreation Management Area (ERMA) identified in all alternatives of the DRMP/EIS recognizes several activities and specific targeted outcomes (see pg. F-9 and pg. 2-29). This list does not preclude non-listed activities as long as they are consistent with the Travel Plan. The management guidelines for an ERMA are found on pg. C-16 of the Land Use Planning Handbook (H-1601-1) and states that actions in an ERMA are custodial only. The setting referred to by the commentor is a statement of fact and not a desired condition.

Colorado Off-Highway Vehicle Coalition (COHVCO)	123	46	We are concerned about the assumption the agency seems to have regarding vehicle use on mancos shale soils contributing to salinity in the Colorado River. The assumption is repeated throughout the DEIS. The data we have reviewed would indicate erosion is occurring in such a massive scale than an increase of TSS/TDS/TMDL caused by all human activities, including road building activities and other vehicle use, cannot be detected. It is insignificant compared to what occurs naturally.	The commentor provides no citation on the data referred. Our sources (Lusby, 1963 and BLM, 1993d) on the Mancos conclude that land use activities, including OHV use, contribute to accelerated erosion and thus increase salinity to the Colorado River.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	47	The portion of the DEIS discussing the Alternatives identifies as a goal and objective maintenance of current air quality. BRC's difficulty with the air quality data is that it is difficult to ascertain from the DEIS the extent to which (a) the asserted incremental benefit influenced the decision to prefer Alternative C; and (b) if it did have significant influence on the decision, why the decision was made to reduce available OHV opportunities when there has been no showing that OHVs contribute to air quality degradation. BlueRibbon respectfully suggests more data on OHV emissions be included in the Final EIS and that a discussion of OHV emissions be included in the Final EIS if OHV emissions influence a decision.	Air quality emissions were not considered in Travel Plan decisions within the DRMP/EIS. The designation of routes in the Travel Plan will not in itself increase travel and emissions.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	48	Alternatives A, B, and C each close significant miles of existing OHV routes in medium and high cultural site-density areas. These closures are justified on the grounds that they will produce "long term beneficial impacts from reduced opportunities for inadvertent impacts, looting, and vandalism." Draft EIS, Sec. 4.3.2. There is no data in the EIS that cultural resources are being, or have been, negatively impacted by the presence of humans engaging in looting or vandalism. BRC believes the closure approach in medium and high site-density areas cuts too broadly for the problem. The identified risk is "inadvertent impacts." "Inadvertent impacts" is undefined and is not discussed in the EIS.	The medium and high cultural site density areas referred to by the commentor relate to the model of cultural resource site densities. This model included on pg. 4-30 of the DRMP/EIS was developed to analyze potential impacts to cultural resources from various land use actions. For Travel Plan development documented cultural sites were utilized to determine whether or not a route had a cultural conflict. The miles of closed route listed in the Chapter 4.3.2 include the 2500 miles of routes not identified because they had no purpose and need. Many of these miles or routes are in high and medium site density areas and these closures would benefit cultural resources. Specific route closures for

			Inadvertent impacts are therefore an unfounded assumption which cannot be attributable to OHV or mechanized use. BRC believes a plan of mitigation, rather than prohibition, is possible and beneficial. This particularly so because numerous recreators use OHVs to access important historical sites.	protection of cultural resources are related to known sites. The term “inadvertent” and according to the dictionary means “unintentional”. Therefore, inadvertent impacts result from actions of people or uses that accidentally cause damage to cultural resources. Access to a large number of cultural sites is provided across all the alternatives for the Travel Plan of the DRMP/EIS. Information has been added to Chapter 3 of the PRMP/FEIS that cultural resources are being, or have been, negatively impacted by the presence of humans engaging in looting or vandalism. Basically that increased access results in increased inadvertent impacts, looting, and vandalism. References will be cited.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	49	Chapter 4.9 discusses the impacts to paleontological resources, and expresses a concern that the more OHV use in sensitive paleontological areas, the greater the risk these areas are for unauthorized fossil collection and vandalism. The DEIS, however, lacks the nexus between OHV use and an increase in vandalism or unauthorized collection of paleontological resources. Additionally, although it is difficult to determine the extent to which existing routes in paleontologically-sensitive areas will be eliminated, again, existing routes will have not been shown with any data in the DEIS to pose an unreasonable risk to those resources.	Information has been added to Chapter 3 of the PRMP/FEIS that paleontological resources are being, or have been, negatively impacted by the presence of humans engaging in looting or vandalism. Basically that increased access results in increased inadvertent impacts, looting, and vandalism. References will be cited.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	50	Much of the discussion of the Alternatives relating to the impact of OHV decisions on recreation (and specifically camping) discusses a perceived threat to soil and vegetation resources due to OHV use. The DEIS lacks a meaningful analysis of the existing conditions and appears to favor closure over mitigation. The result is a significant loss of recreational opportunities, including a significant loss of camping opportunities. This, in an area which the DEIS recognizes is very important for	On pg. 4-235 of the DRMP/EIS the impacts of reducing recreation travel opportunities on motorized users are discussed. On pg. 4-267, the effects of restricting dispersed camping are discussed. See response to comment 123-8.

			camping activities. As in other discussions of resource damage due to OHV use, such damage is simply and summarily presumed in the discussion of the camping resource. It is neither quantified or otherwise demonstrated in a useful manner. The resultant decision lacks evidence of the requisite “hard look” present in defensible NEPA documents. Moreover, the effects of the significant loss of OHV opportunities on other resources has not been analyzed, which they must pursuant to NEPA.	
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	51	Again, it is difficult to ascertain the extent to which any concern of the impact of OHV use on riparian areas had on designating Alternative C as the preferred alternative, but to the extent it influenced the decision at all, there is less than meaningful analysis; there simply is none. Thus, closures are not justifiable on grounds that OHV use will adversely affect riparian areas. This section generally identifies the resource benefits of reducing OHV and camping activities without discussion of how existing OHV and camping activities will further impair resource protection.	The BLM utilized the Standards for Public Land Health and Guidelines for Recreation Management for BLM lands in Utah in considering the impacts of OHV use and dispersed camping on riparian areas (Appendix R of the DRMP/EIS). On pg. R-2, Rangeland Health Standard 2 directs the BLM to “where feasible, developed travel routes should be located away from sensitive riparian areas” and “camping in riparian areas should be avoided …to reduce vegetation disturbance and sedimentation”.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	52	The DEIS fails to adequately consider all resource values in its decision to establish “Areas with Wilderness Characteristics.” It is improper to make decisions based upon an inventory for a single resource value, in this case; ‘wilderness character’. FLPMA’s Section 201, which is the section of FLPMA under which the Department claims authority for the 1999 wilderness inventory, does not give the Secretary authority to undertake such an inventory effort for just one resource value.	The DRMP/EIS includes 4 alternatives that provide different ways of managing uses and other resources. Wilderness characteristics are just part of the myriad of resources we consider in the land use planning process. See response to comment 121-10.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	53	One serious concern with utilizing the 1999 Wilderness Inventory has to do with the lack of public involvement both in the development of inventory criteria. These concerns are directly related to the agency’s congressional mandates and obligations to the public when developing management plans. In fact, although	The criteria used by the BLm in its 1999 Wilderness Inventory were those of the noiw withdrawn "Wilderness Handbook." The Handbook itself was based on the criteria of the 1964 Wilderness Act, which had ample public input and comment as part of the normal legislative process.

			the original Wilderness Inventory Handbook acknowledged the importance of public involvement when inventorying for Wilderness characteristics, the 1999 Wilderness inventory criteria and procedures went out of its way to eliminate public involvement.	Upon completion of the 1999 inventory, the BLM solicited comments from the public through public meetings and published invitations to comment. The resultant approximately 12,000 responses led to numerous BLM field checks. The findings from the BLM's response to comments for the Moab Field Office were incorporated in the 2003 "Revisions to the 1999 Utah Wilderness Inventory".
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	54	The “Utah Wilderness Review Procedures” adopts some of the guidelines and requirements laid out in the original WIH and the Organic Act Directives (OAD’s). The Interior Department maintains that the re-inventory procedures are the same as the previous ones, thereby fulfilling Secretary Babbitt’s commitment to the Utah’s Congressional Delegation that the re-inventory team “is explicitly instructed to apply the same legal criteria that were used in the original inventory” to his re-inventory effort. Clearly, the re-inventory document has a much lower threshold for what qualifies as “natural” than the one applied in the original inventory.	See response to comments 120-8 and 121-10.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	55	GIS mapping of vegetation and making assumptions about wildlife activity based upon the vegetation is not an accurate way of assessing importance of any given area for wildlife. Without ground truthing of vegetation conditions it can only be assumed what both density and diversity is in an area. Thus, invalid assumptions can be made about habitat and wildlife in an area and wrong decisions made about potential impacts on wildlife as the result of motorized routes and their use. Trails could be removed or not allowed using unsubstantiated information.	Vegetation habitat types were utilized in Chapter 4 of the DRMP/EIS to analyze general potential impacts to sensitive species. No travel plan decisions were based on this information. Routes were only eliminated from identification in the alternatives for the Travel Plan based on specific wildlife habitat coverage.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	56	Consideration has to be given to changing livestock grazing activity throughout the area. Currently, much of the MPA is in need of changes in grazing practices. Some areas should have livestock grazing entirely removed and other areas need to have the grazing	Grazing practices are adjusted on an allotment basis using the Standards for Rangeland Health and the Guidelines for Grazing Management (see Appendix Q of the DRMP/EIS. These site specific decisions are not land use planning decisions.

			program modified. Through these efforts habitat conditions would improve in many areas and wildlife would benefit. It could be argued that changes in grazing practices with the resultant improved habitat would benefit wildlife and offset many impacts attributed to OHV activity.	Closures to livestock use have been considered during plan development to reduce conflicts with other uses. In most cases BLM believes that multiple use is most appropriate and conflicts between uses can be mitigated to an acceptable level while meeting Utah's Rangeland Health Standards.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	57	Page 4-464 – It is stated that, "short term adverse impacts include human presence and noise disturbances (though some species can become habituated to certain noises). Long-term adverse impacts include habitat fragmentation from roads and cross-country riding, soil compaction, increase erosion and reduced air quality". It has been demonstrated by wildlife themselves just how adaptable they are and how readily they habituate to the presence of motorized activity. When there are repetitive human activities they can and do adjust to these activities and use habitat adjacent to these areas. Habitat fragmentation is always an issue. All too often the argument is made that trails will fragment habitat. In reality, the animals may move away from the trail when there is human activity, but will move back into the area when, in this case, the rider moves out of the area. Also trails and roads do not serve as barriers to movement.	Designated routes will be utilized by motorized users although the level of use is impossible to determine. The statememnt on 4-464 acknowledges the impacts to wildlife from use of the routes. Use of the routes results in short term habitat fragmenation. The BLM stands by the statement on the impacts to wildlife. The BLM assumes that designated routes will be utilized by motorized users. During times of use, the animals will move away. The BLM does not claim that the animals will not move back when the use passes.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	58	There would have to be more supportive documentation to show why these areas (ACECs in Alt B) should be closed to motorized use. Absent data demonstrating that both habitat and wildlife are being adversely affected by the presence of motorized trails the areas should not be closed to use. As shown in Alternative C the BLM must feel the same way about justification for these closures.	ACECs in Alt B are limited to identified routes and are not closed to motorized use as specified in the DRMP/EIS on pg. 2-33 through pg. 2-39.
Colorado Off-Highway Vehicle Coalition	123	59	Of the BLM Sensitive species mapping indicates that only burrowing owl habitat occurs in the area [White Wash Sand Dunes]. However, when looked at on a site-specific basis there is very little of the area that	The maps of habitats regarding sensitive species were obtained from the U.S. Fish and Wildlife Service and the Utah Division of Wildlife Resources. These agencies are recognized as the agencies with jurisdictional expertise

(COHVCO)			provides conditions for these birds. Much of the area lacks habitat for prairie dogs and ground squirrels which is their primary prey base. Suitable nesting habitat is also lacking. Suitable habitat for prey species may be found in areas where there are existing trails, but no new trails would be allowed. No prairie dog habitat is mapped for the area.	for sensitive species. No routes were excluded from the White Wash area for sensitive species habitat management. The issues in the White Wash area were cultural, riparian and bighorn sheep habitat.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	60	This is an area [White Wash Sand Dunes] utilized by a small herd of desert big horn sheep. There is no lambing or rutting habitat shown for this area, but there are migration routes n the area. The existing motorized trail system and open area in the dunes area is not known to be adversely affecting the big horns. There are areas nearby where motorized traffic is lacking that provides suitable habitat for the sheep. Closing the Duma Point trail and not allowing motorized use in an area encompassed by Brian's Trail, the Dee Flat/Dee Pass Road and the Balanced Rock Trail to the Duma Rim Trail would provide an area where big horns would have escape cover and secure areas. The BLM has indicated they will close the Duma Point Trail to provide escape cover for the sheep. However, in a conversation with Bill Bates (UDWR) it was learned that the division has plans to relocate this herd to another area of the state that provides better habitat conditions and will help insure the viability of this small herd. With the relocation of this herd potential impacts to this small population will be eliminated. If the big horns are relocated then the entire area proposed by BRC as shown on Figure 1 would be open to motorized use. Other than in the immediate sand dunes area, motorized use would still be limited to existing trails or slick rock areas, which would result in no additional impacts to habitat in the area.	The bighorn sheep herd around Crystal Geyser was recently relocated to Johns Canyon in San Juan County, Utah. The Utah Division of Wildlife Resources does not intend to relocate the herd from the Duma Point area. The need to provide escape terrain to the Duma Point bighorn herd has resulted in the non-designation of several miles of user-made motorcycle trails in the Duma Point area. The user made trails that are below the crucial bighorn habitat in the Duma Point area have been designated.
Colorado Off-Highway	123	61	None of the remainder of the area [White Wash Sand Dunes] is mapped as habitat for other listed species.	The BLM agrees that no other listed wildlife species are present in the White Wash area. The designation or non-

Vehicle Coalition (COHVCO)			Obviously, other wildlife species use the area, including neo-tropical birds, mammals, amphibians and reptiles. Without surveys or studies to assess the importance of this area to any of these species, it must be assumed that use is in line with the available habitat. It must also be assumed that at current use levels without any additional trail development wildlife use would remain constant.	designation of trails in the White Wash area was not due to the habitat needs for listed species.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	62	There are opportunities in this area [White Wash Sand Dunes] to enhance water sources for all wildlife. Providing additional water sources in areas away from where motorized traffic occurs would reduces the changes of species being adversely affected as motorized activity increased in the area. Fencing riparian areas to exclude livestock and motorized traffic there would be an increase in suitable habitat that would benefit a number of species. Other efforts to improve riparian conditions such as supplemental plantings would also benefit wildlife and compensate for potential impacts from OHV activities.	Wildlife improvements are not a resource allocation that requires a land use planning decision. Alt C and Alt D in the DRMP/EIS propose to protect White Wash water sources which would benefit wildlife. The BLM will seek to improve wildlife habitat in the White Wash area on a site-specific, case by case basis.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	63	There are a few very small areas mapped in the Dee Pass Focus Area as potential Mexican Spotted Owl (MSO) foraging habitat. These are very small isolated pockets and are well removed from any suitable nesting habitat, which precludes the chances of any of this area would be used by the owl. Further, this mapped foraging habitat was based upon a model and it is probably safe to assume there was no ground truthing of the area to verify habitat conditions.	The BLM is directed by the U.S. Fish and Wildlife Service to utilize the model for identifying potential Mexican Spotted Owl (MSO) habitat. However, due to isolated pixels of breeding habitat and no foraging habitat this area is not suitable for MSO occupancy. No existing routes were closed in any of the alternatives for the Travel Plan in the DRMP/EIS due to conflicts with MSO. Establishment of new routes would not require MSO surveys before they could be added to the Travel Plan.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	64	The desert big horns using this area [Dee Pass] would be the same herd that is found in the White Wash area. Relocation of the herd would result in there being no issues with these animals in this area.	The Utah Division of Wildlife Resources has no plans to relocate the bighorn sheep herd in the Duma Point and Dee Pass area. Relocating sheep from Dee Pass would not be advantageous because other sheep from adjacent areas would emigrate into the Dee Pass area. The BLM's travel plan has allowed public use of the Dee Pass area with the closure of only a few of the user-made motorcycle trails that are within the area.

Colorado Off-Highway Vehicle Coalition (COHVCO)	123	65	This area [Dee Pass] is mapped as providing suitable habitat for burrowing owls. This appears to have been a general observation about habitat availability in the area for these birds. Without site-specific surveys of the area it cannot be assumed that these birds use the area for nesting and brood rearing. Surveys of the area would have to be conducted before any determinations could be made about trail closures or the establishment of new trails.	No existing routes were closed in any of the alternatives for the Travel Plan in the DRMP/EIS due to conflicts with burrowing owls. Establishment of new routes would require surveys before they could be added to the Travel Plan. Burrowing owls are protected under the Migratory Bird Treaty Act.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	66	Except for the Mexican Spotted Owl (MSO) none of this SRMA [Utah Rims], as currently laid out, is mapped as habitat for any of the federally listed Threatened, Engangered, or Candidate Species. There are a few very small areas mapped as potential MSO foraging habitat. These are very small isolated pockets and are well removed from any suitable nesting habitat, which precludes the chances of any of this area would be used by the owl. Further, this foraging habitat was based upon a model and it is probably safe to assume there was not ground truthing of the area to verify habitat conditions. Any motorized or mountain bike trails in this area would be removed from these pockets of timber or cliff areas.	The BLM agrees that none of the Utah Rims SRMA is mapped as habitat for any federally listed species. No routes were removed from the Utah Rims area due to issues with special status species. Those routes not designated were primarily due to cultural resource conflicts. Refer to response to comment 123-63.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	67	The area [Utah Rims SRMA] is mapped as burrowing owl habitat. The amount of burrowing owl activity in the area is unknown. Given limited prairie dog activity in the area it must be assumed that this is probably helping to hold burrowing owl numbers down. Burrowing owls also prey on ground squirrels and will be found where there are concentrations of these animals. The small amount of habitat that is affected by single-track routes would not have an affect on the prey base or nesting and brood rearing habitat for the burrowing owl.	Refer to response to comment 123-65. No routes in the Utah Rims area were not designated due to burrowing owl habitat. The primary resource of concern in the Utah Rims area was cultural resource conflict.
Colorado Off-Highway	123	68	There is nesting and foraging habitat for both bald and golden eagles in the area [Utah Rims SRMA]. Nesting	The issue raised by the commentor is not a comment on the plan. No existing routes were closed in any of the

Vehicle Coalition (COHVCO)			by these birds would occur on cliffs or cottonwoods along the river. Both summer and winter foraging habitat for bald eagles and to a lesser degree golden eagles is shown as occurring in the area where there are designated motorized trails. The chance of motorized activity affecting foraging activities is very minor. It is doubtful that there has been a problem in the past with riders disturbing foraging activities by these birds. It must also be assumed that with the large expanses of suitable nesting habitat in the canyonlands area that nest disturbance has not and will not be an issue.	alternatives for the Travel Plan in the DRMP/EIS due to conflicts with eagles, so the issues raised by thwe commentor are moot. Establishment of new routes would require surveys before they could be added to the Travel Plan. Eagles are protected under the Migratory Bird Treaty Act and the Bald Eagle Protection Act.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	69	The Utah Rims SRMA is located in an area mapped as ferruginous hawk habitat. There are not known nest sites immediately adjacent to any of the trails. There is suitable P/J habitat in the area and is probably used by these birds. It was not indicated in the document to what degree the area is used for nesting and foraging.	The issue raised by the commentor is not a comment on the plan. No existing routes were closed in any of the alternatives for the Travel Plan in the DRMP/EIS due to conflicts with ferruginous hawks. Establishment of new routes would require surveys before they could be added to the Travel Plan. Ferruginous hawks and all raptors are protected under the Migratory Bird Treaty Act.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	70	Thompson Trail has already been surveyed by the BLM and is shown on the Alternative C & D map. However, this route is not the same as that proposed by RwR. The alignment proposed by RwR does deviate from the BLM proposed route, but not significantly. While conducting an aerial survey of the route it was obvious that this route would provide a better riding experience than the BLM route. When compared to the BLM route, using the RwR route would not result in any additional measurable impacts on habitat and wildlife found in the area.	Establishment of any new routes, or realignment, would require surveys for raptors and sensitive species before they could be added to the Travel Plan. Raptors are protected under the Migratory Bird Treaty Act. The BLM is required to manage sensitive species so that impacts would not lead to Federal listing under the Endangered Species Act. The Thompson Trail, a user made trail in an area that has been limited to existing routes since the 1985 Grand RMP, was not verified during the travel plan identification process.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	71	A review of wildlife information contained in the DRMP shows portions of the Thompson Trail passing through historic white-tailed prairie dog habitat. Because there are no roads accessing these prairie dog towns, people going to those areas to shoot prairie dogs would be the primary impact.	There are numerous routes in the alternatives for the Travel Plan of the DRMP/EIS that provide access to prairie dog habitat. The shooting of prairie dogs is governed by wildlife regulations promulgated by the Utah Division of Wildife

				Resources. Access to where persons wish to shoot is not always guaranteed by the BLM Travel plan.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	72	The area [Thompson Trail] is mapped as burrowing owl habitat. The amount of burrowing owl activity in the area is unknown. The small amount of habitat that is affected by the single-track route would not have an affect on the prey base or nesting and brood rearing habitat for the burrowing owl.	Refer to response to comment 123-65. The non-designation of the Thompson Trail is Alt C is not because of burrowing owl habitat.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	73	The area [Thompson Trail] where this trail is located provides habitat for golden eagles. The active number of eagle nests along the cliffs indicated that ongoing human activity including motorcycle riders and oil/gas field development is not affecting their nesting activities.	Refer to response to comment 123-68. The non-designation of the Thompson Trail is not because of golden eagle habitat.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	74	The route [Thompson Trail] does go through mapped ferruginous hawk habitat. There are no known nest sites immediately adjacent to the trail. As a mitigation measure, trail user groups could help erect structures, monitor nesting activity, and provide data to the BLM.	Refer to response to comment 123-69. Coordination with user groups to work with the BLM on a volunteer basis is an administrative action and does require a land use planning decision.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	75	The area [Thompson Trail] has been mapped by the UDWR as antelope year around and kidding habitat. Given the low numbers of antelope found in the area it is doubtful use of the single-track trail will affect these animals at the individual or population level. During the winter there is little dirt bike use of the trail, which further minimizes the chances for impacting the antelope utilizing the area during the winter.	According to aerial surveys by the Utah Division of Wildlife Resources, large concentrations of antelope occupy areas along the Thompson Trail. The BLM agrees that use of the trail during the winter would have minimal impacts; however, impacts would increase during the fawning season. No existing routes were closed in any of the alternatives for the Travel Plan in the DRMP/EIS due to conflicts with antelope habitat. Establishment of new routes would require site specific NEPA analysis before they are considered for inclusion in the Travel Plan.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	76	The area [Thompson Trail] is shown as being deer and elk habitat. However, none of the area is mapped as crucial wintering habitat or as calving and fawning area. It must be assumed there is little deer and elk use of habitat along the single-track route. Continued use of the route would have little or no affect on these animals.	The BLM agrees that there is minimal use of the deer and elk habitat in this area. Deer and elk habitat is not an issue in the non-designation of the Thompson Trail in Alt. C. No existing routes were closed in any of the alternatives for the Travel Plan in the DRMP/EIS due to conflicts with deer and elk habitat. Establishment of new routes would require site specific NEPA analysis before they are considered for inclusion in the Travel Plan.

Colorado Off-Highway Vehicle Coalition (COHVCO)	123	77	It has been stated that where the Thompson Trail crosses dry washes and washes supporting riparian vegetation there is a negative impact on the watercourse. It has been indicated that soil stability is affected and increased salinity results. It is questionable that this small area of disturbance could cause a detectable change in discharges of soils and elevated salinity at the discharge point of the wash into a perennial waterway. Further, these small disturbances at the crossings have a minimal effect on riparian vegetation where it exists. If these crossings were armored the minimal amount of impact that is occurring would be further reduced.	Unrestricted travel in wash bottoms results in resource impacts as determined by BLM staff specialists. Concerns include destabilization of banks, accelerated erosion and use of wash bottoms by wildlife as travel corridors. In addition, observations indicate that some users do not remain in the wash bottoms, but leave them to return to the main travel routes. This results in cross country travel and its related impacts to wildlife and other resource values.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	78	Of greater significance to habitat condition in the area [Thompson Trail] is livestock grazing. Observations made while flying the area made it evident that cattle grazing is having a significant impact on habitat conditions. Cattle are concentrating around water sources and along riparian bottoms. This is resulting in poor habitat conditions in these areas. Grazing can eventually reduce habitat quality species associated with riparian, desert shrub, and sagebrush habitats. If livestock grazing were eliminated or grazing practices modified to improve habitat conditions there would be an expected increase in both density and diversity of wildlife. This would more than compensate for the small amount of habitat disturbance associated with single-track trail.	Grazing practices are adjusted on an allotment basis using the Standards for Rangeland Health and the Guidelines for Grazing Management (see Appendix Q of the DRMP/EIS. These site specific decisions are not land use planning decisions.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	79	Changing grazing practices [near Thompson Trail] or eliminating grazing would result in improved habitat conditions for prairie dogs and subsequently species such as raptors. This could be especially true in the case of burrowing owls that are known to focus on prairie dog towns for nesting and brood rearing.	See response to comment 123-78.
Colorado Off-Highway Vehicle	123	80	In addition to improving vegetation and habitat conditions [near Thompson Trail] through changes in grazing practices soil compaction and salinity would be	See response to comment 123-78.

Coalition (COHVCO)			reduced. Soil compaction results in more rapid runoff when there are events and less moisture is retained in the soil to support vegetation. It has also been found the livestock grazing results in increased salinity. Increasing the salinity in already saline soils especially in arid areas with relatively infertile soils can result in inhibited plant diversity and density. Which, when runoff occurs, potentially moves down drainage to the Colorado River.	
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	81	Except for the Mexican Spotted Owl (MSO) none of this area [Pole Canyon/Black Ridge] is mapped as habitat for any of the federally listed Threatened, Endangered, or Candidate Species. Almost the entire area is mapped as potential MSO foraging habitat. The mapped foraging habitat is based upon a model, which leaves the door open to question whether these birds do forage in the area. There is no nesting habitat mapped for the area. USFWS designated critical habitat is found well away from this area.	The BLM is directed by the U.S. Fish and Wildlife Service to utilize the model for identifying potential Mexican Spotted Owl (MSO) habitat. Suitable habitat has been identified in or near the Pole Canyon/Black Ridge area and is under protocol surveys for MSO absence.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	82	The area [Pole Canyon/Black Ridge] is mapped as crucial deer and elk winter range. In a conversation with Bill Bates, biologist with UDWR, he stressed that the Black Ridge area is critical to wintering deer and elk also use the area. To a lesser degree they use sagebrush areas found in the Pole Canyon area. They have many years of data to support their observations about winter use by these big game species. There are already a number of roads and trails that are frequently used in this area. When conditions permit this area is used on a year around basis. How much effect this has on winter use of the area by deer and elk is unknown.	The BLM agrees that this area is crucial deer and elk winter range. This resource is one of the reasons that travel has been limited to designated routes within this area. No existing routes were closed in any of the alternatives for the Travel Plan in the DRMP/EIS due to conflicts with deer and elk habitat. Establishment of new routes would require site specific NEPA analysis before they are considered for inclusion in the Travel Plan.
Colorado Off-Highway Vehicle Coalition	123	83	If activities [in Pole Canyon/Black Ridge] as proposed by RwR are implemented motorized and mountain bike activity would be limited to specific areas. Within these specified areas mitigation measures could be imposed	No existing routes were closed in any of the alternatives for the Travel Plan in the DRMP/EIS due to conflicts with deer and elk habitat. Establishment of new routes would require site specific NEPA analysis before they are

(COHVCO)			that would greatly reduce potential impacts on wintering deer and elk. These could include closure of the areas during the winter months to eliminate disturbance of wintering animals by human activity. As a mitigation measure habitat improvement work could be implemented in portions of the areas to provide better winter forage conditions for the animals. Use of the area as proposed by RwR would be limited to areas that do not provide good winter range for big game. Trails bike, rock crawling, and mountain bike preferred areas of use do not include the better wintering habitat areas. No new trails would be established and old trails closed in areas providing good winter habitat. Habitat improvement by brush hogging and other activities could be implemented to further improve habitat conditions for wintering animals. Those off road user groups that utilize the area could fund habitat improvement work. In addition to these measures there would be timing limitations on use of the area by OHVs and mountain bikes. Bates indicated that if the area were closed to all of the above mentioned activities from April 15 through November 1 each year and habitat improvement measures implemented, the UDWR could support use of the area.	considered for inclusion in the Travel Plan. The mitigation measures suggested by the commentor would be considered during the site specific NEPA analysis for new routes. The activities in the Pole Canyon and Black Ridge area proposed by Ride with Respect were not considered in the DRMP/EIS because many of them were not suggested during the scoping period and were not analyzed as part of this EIS.
Colorado Off-Highway Vehicle Coalition (COHVCO)	123	84	This area [Copper Ridge] is mapped as providing suitable habitat for burrowing owls. This appears to have been a general observation about habitat for these birds. Without site-specific surveys of the area it cannot be assumed that these birds use the area for nesting and brood rearing. Surveys of the area would have to be conducted before any determinations could be made about the importance of this area to these birds. The absence of any mapped prairie dog towns further reduces the changes that any of these birds would be found in the area.	See response to comment 123-65.

Colorado Off-Highway Vehicle Coalition (COHVCO)	123	85	Prior to making final decision on whether some routes should be in or out, there is a need to conduct site-specific surveys to evaluate habitat conditions. Generally eliminating routes without these surveys is not warranted. Unless it can be proven that OHV use is causing a decline in habitat quality with a resulting impact on wildlife justification for elimination of a route would not be warranted.	In general, no routes were eliminated in the alternatives for the Travel Plan in the DRMP/EIS solely for wildlife conflicts. A few routes were eliminated from the alternatives for the Travel Plan due to specific conflicts with bighorn sheep habitat. Extensive research using data collected from radio transmitted collars supports these travel management decisions regarding bighorn sheep. Establishment of new routes would require site specific NEPA analysis before they are considered for inclusion in the Travel Plan. The NEPA analysis may require wildlife surveys. Section 202(c)(4) of the Federal Land Policy and Management Act directs the BLM “to rely to the extent it is available on the inventory of public lands, their resources, and other values” in the development or revision of land use plans.
Southern Utah Wilderness Alliance (SUWA)	124	1	The public comment period is far too short to allow for a fully informed response to the draft plan.	The BLM provided the public with 90 days to review and comment on the DRMP/EIS, as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period doubling the amount of time for the public to review and comment on the DRMP/DEIS. The BLM made the DRMP/DEIS available, free of charge to the public, in a variety of media, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the DRMP/DEIS and help focus review and comment efforts. Finally, the BLM held four open houses around the State to facilitate review of the Moab DRMP/DEIS. online. In addition, the Moab Field Office posted the draft

				alternatives on the Moab RMP website for almost a year prior to the issuance of the Draft RMP/EIS.
Southern Utah Wilderness Alliance (SUWA)	124	2	The National Visitor Use Monitoring Survey (NVUM) conducted in 2006 was not made available to the public and certain data within that document is not adequately incorporated into the Draft RMP/EIS.	The NVUM report was in draft form at the time of the publication of the Draft RMP/EIS (and certain parts of the analysis have not been done yet). The BLM provided the commentor with a draft version of NVUM despite its non-final form. The commentor erroneously concludes that BLM failed to use NVUM data properly, and "provided more public lands for ORV use". In fact, all action alternatives reduce OHV opportunities in the MPA by reducing open acreage significantly, and by significantly reducing miles of routes designated for travel. The commentor selectively cites NVUM findings specific to its argument, while ignoring NVUM conclusions which may run counter to its argument. For example, over half of the respondents indicated some form of motorized activity as one in which they participated in during their BLM visit. The USFS (FS) conducted a pilot study of the potential applicability of NVUM to the BLM in FY 2007, using three BLM offices as the pilot. The BLM was initially hesitant to release the results of the studies, but did so because of public interest. The BLM hesitation was based on concerns that users of the data might not realize the limitations and caveats inherent in the pilot nature of the study and the preliminary nature of the data. As the NVUM report explicitly states, the three pilot studies are just that-pilot studies. From the beginning of the process, BLM shared concerns with FS that its model may not be fully applicable to the BLM and its management needs. The FS agreed with the BLM, but suggested that we start with the FS model (with some modifications), and later evaluate the product generated to see if further modifications were desirable for future BLM studies (or even if such studies are warranted). For

				example, the BLM felt from the beginning that certain strata (developed campgrounds, for example) might be oversampled, while other strata (for example, dispersed recreation) might be undersampled. These concerns have been incorporated into future NVUM planning, based on feedback from the initial pilot studies. The net result is that the findings of the NVUM studies for the three pilot study sites may not definitively represent actual visitation patterns and uses for the studied offices. The preliminary nature of the NVUM data for the BLM pilot sites must be emphasized. The FS has only recently posted on the NVUM website the adjusted data from FY 2005 studies. Economic data collected as part of the NVUM process is compiled only every few years, and none is yet available for the 2007 studies.
Southern Utah Wilderness Alliance (SUWA)	124	3	The FOIA submitted by SUWA on August 23, 2007 requesting RMP background documents was not responded to during the public comment period even though the deadline for the provision of those documents has expired.	The FOIA process and the land use planning process are different and separate. However, the FOIA procedures were followed by the BLM in responding to the commentor's FOIA request of 8/23/07 and the information requested was provided on December 12, 2007. There are remedies through the FOIA process should the commentor seek to pursue them. Much of the information in the FOIA request has been made available to the commentor over a period of time.
Southern Utah Wilderness Alliance (SUWA)	124	4	The Moab Draft RMP fails to acknowledge public will regarding land management preferences. During the scoping period the majority of the public favored a pro-conservation and non-motorized position by a majority of 10:1.	The issues raised during the scoping period were incorporated into the Moab Draft RMP/EIS. The scoping comments identified by the commenter are specified as Issues 1 & 10. Issue 1 states: How can increased recreation use, especially motorized vehicle access, be managed, while protecting natural resource values? Issue 10 states: How should non-WSA lands with wilderness characteristics be managed? A range of management actions was developed to address the issues identified by the public. All the action alternatives significantly reduce areas open to cross country use and significantlly reduce the number and mileage of routes

				open to motorized travel. It should be noted that even the BLM's Alt D (the least restrictive alternative to motorized travel) proposes fewer routes than the travel plan submitted by the commentor during the scoping period.
Southern Utah Wilderness Alliance (SUWA)	124	5	FLMPA requires that BLM give priority to designation and protection of areas of critical environmental concern (ACEC). Protection of existing ACECs and due consideration of proposed ACECs must be a priority in the RMP process. The designation of only 63,252 acres of ACECs in the planning area of some 609,687 acres found eligible falls far short of FLMPA's mandate that BLM give "priority" to this resource. SUWA recommends that the BLM follow the mandate of FLPMA and give priority to the designations of ACECs and not treat ACEC designation as merely another constituent management option in a matrix of options.	The BLM gave full consideration to designating and persevering ACEC during this land use planning process. The BLM evaluated 35 ACEC nominations and found 14 to meet the criteria for designation as an ACEC. All 14 ACECs are proposed for designation in Alternative B, 5 ACECs are proposed for designation in Alternative C, and 0 ACECs are proposed for designation in Alternative D. These alternatives analyze and disclose the impacts of the proposed ACEC management prescriptions and protections. The relevant and important values identified in the ACEC process are proposed for ACEC designation in one or more alternatives and in many cases where ACECs are not proposed for designation, these values are provided protective measures by other management actions. The management of ACECs is considered within the entire spectrum of BLM’s multiple-use mandate.
Southern Utah Wilderness Alliance (SUWA)	124	6	Certain elements of the RMP, most strikingly the travel plan, fail the test of the unnecessary or undue degradation (UUD) standard of FLPMA. By several measures, the proposed travel plan will harm natural resources by increasing cumulative dust and decreasing air quality, unnecessarily fragmenting wildlife habitat, causing unnecessary damage to riparian areas, floodplains and cultural resources, and reduction of naturalness in areas with identified wilderness characteristics.	The BLM analyzed the impacts of travel management as outlined and described in Chapter 4 of the DRMP/EIS. Congress recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. Also, as a matter of clarification, the UUD is a management standard that the BLM applies to third party public land users.
Southern Utah Wilderness Alliance (SUWA)	124	7	In the context of this RMP, the decisions made with regard to travel planning must more fully analyze all effects of travel planning and other planning so that all cumulative and site specific environmental and social impacts are adequately analyzed.	Land use planning is a tiered process ranging from broad general allocations and management prescriptions to subsequent site-specific authorizations. The direct, indirect, and cumulative impact analyses were analyzed in Chapter 4 of the DRMP/EIS. Site specific analyses is

				not possible at the land use planning level. Detailed impact analysis will be conducted for site-specific authorizations during implementation of the decisions in the RMP.
Southern Utah Wilderness Alliance (SUWA)	124	8	The range of alternatives does not provide protection of natural and cultural resources is a fatal flaw to this plan.	The DEIS/RMP provides 4 alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping.
Southern Utah Wilderness Alliance (SUWA)	124	9	The Draft RMP did not consider a more environmentally protective alternative consistent with FLPMA's requirement that BLM "minimize adverse impacts on natural, environmental, scientific, cultural, and other resources" and omiitted the Redrock Heritage Proposal.	In the Moab DRMP/EIS, Alternative B emphasizes the protection and preservation of natural resources and minimizes human activities, over commodity production and extraction and motorized recreation access. Alternative B best protects and preserves historic, cultural and natural resources fulfilling both the requirements of FPLMA and NEPA. The BLM did give full consideration to the Redrock Heritage Proposal, in particular the concept that a desirable BLM Travel Plan contains an equitable allocation between non-motorized and motorized recreation. Although for the reasons outlined in the DRMP/EIS on pg. 2-107 the Redrock Heritage Proposal was eliminated from detailed analysis, components of the proposal were carried forward for consideration and analysis in all the action alternatives.
Southern Utah Wilderness Alliance (SUWA)	124	10	The Draft RMP/EIS does not have an alternative that mitigates the harm of designating certain routes such as Hey Joe.	The DRMP/EIS analyzed a range of reasonable alternatives. Closing all roads is not considered a reasonable alternative. The Hey Joe road was considered to have a purpose and need for recreational use (including permitted use) under all alternatives. Alt A designates 2,871 more miles of routes than does Alt B.
Southern Utah Wilderness Alliance (SUWA)	124	11	Accurate, scientific analysis is wholly lacking with regard to travel planning, as well as many other aspects of the Moab Draft RMP.	:A systematic interdisciplinary approach was used to provide accurate, objective and scientifically sound environmental analysis on the environmental consequences associated with the management actions or prescriptions under each alternative. The best available

				data were used for travel planning analysis, including wildlife data from the Utah Division of Wildlife Resources and U.S. Fish and Wildlife Service. The analysis discloses the direct, indirect and cumulative affects on the public lands resources and uses sufficient for the decision maker to make a reasoned choice among alternatives. The DRMP/EIS used a systematic interdisciplinary approach fully considering physical, biological, economic, and social aspects of management actions for the range of alternatives.
Southern Utah Wilderness Alliance (SUWA)	124	12	The existence of the National Visitor Use Monitoring survey, giving the BLM significant baseline data from which to draft alternatives, calls into question the validity of the baseline analysis and shows that the BLM ignored significant and new information regarding the affected environment.	See response to comment 124-2.
Southern Utah Wilderness Alliance (SUWA)	124	13	The dismissal of the Redrock Heritage Proposal is a clear indication of the BLM's refusal to entertain a responsible "opposing view" in the planning process.	See response to comment 124-9.
Southern Utah Wilderness Alliance (SUWA)	124	14	One of the most obvious and consequential flaws in the document is its failure to assess the ongoing impact of existing ORV use in the MFO. For example on pg. 4-442 the BLM asserts that travel on designated routes would have negligible impacts on vegetation because past use has already occurred.	The impacts of travel on natural resources are analyzed in Chapter 4 of the DRMP/DEIS, including the No Action alternative. The Travel Section in Chapter 3 of the DRMP/EIS presents the baseline (current situation) for analysis in Chapter 4. It discusses the ongoing and baseline issues surrounding cross-country travel that is currently permitted by the existing land use plan for the Field Office. The planning area was inventoried as having 6,199 miles of non-paved routes. This number represents the baseline for analysis, however, it is also recognized that cross-country travel is currently allowed in many other areas within the Field Office. The impacts associated with cross-country OHV use are described in Chapter 4 under the No Action Alternative. The action

				alternatives limit travel to designated routes. The routes that are already in use are considered part of the baseline, and therefore, it is not reasonable to consider the impacts to vegetation from these already disturbed linear surfaces.
Southern Utah Wilderness Alliance (SUWA)	124	15	What is the basis for Table 3.18? Could it be that ORV use is actually a "low" level use given that only 6% of visitors engage in it?	The information provided in Table 3.18 is based on professional judgement and observation of visitor use in the planning area. It should be noted that jeeping, ATVing, and dirt biking are separated in Table 3.18 but all of these activities are considered as OHV use. See also response to comment 124-2.
Southern Utah Wilderness Alliance (SUWA)	124	16	Existing conditions should include the presence of non-native species like cheatgrass. Numerous studies are readily available on this subject and should have been described by the BLM or used as the basis for a description of the manner in which roads and ORVs spread weeds and contribute to wildfire.	Table 3.50 lists noxious and invasive species of Grand County and cheatgrass is listed in this table. Complete inventories of noxious weeds are not availble across the planning area. Within the action alternatives travel is limited to designated routes and open cross country travel is essentlally eliminated. Therefore, the potential for the spread of noxious weeds by OHV use is substantially reduced (pg. 4-428).
Southern Utah Wilderness Alliance (SUWA)	124	17	Existing conditions should include the extent of soil erosion caused by ORVs and other uses. For example, a study entitiled "Desert Biological Soil Crusts" indicate these crusts can be easily pulverized.	The DRMP/EIS on pg. 3-120 acknowledges the existence of biological soil crust in the planning area. An complete inventory of the biological crusts across the planning area is not available from any source. The impacts of cross counrty OHV use on soils and biological crusts is discussed on pg. G-24.
Southern Utah Wilderness Alliance (SUWA)	124	18	Existing conditions should include an explanation of how ORV use spreads non-natives which outcompete native plants and how ORVs crush native vegetation.	See response to comment 124-16. The DRMP/EIS on pg. 4-428 assesses the impacts of OHVs crushing vegetation.
Southern Utah Wilderness Alliance (SUWA)	124	19	Existing conditions should include the impact of ORVs and other uses on riparian areas.	On pg. 4-244, the impacts of travel on riparian resources are discussed by alternative. In all action alternatives, motorized travel in riparian areas is reduced. Further details concerning the impacts of motorized travel on riparian resources are discussed on pg. G-24.
Southern Utah Wilderness	124	20	Existing conditions should include the relative demand for various recreation opportunities. The BLM made a	See response to comment 124-15.

Alliance (SUWA)			false assumption about the demand for motorized recreation.	
Southern Utah Wilderness Alliance (SUWA)	124	21	The BLM's failure to analyze and present information about impacts of existing ORV use violates its NEPA duties. BLM falsely assumes that designating routes causes no new damage. This designation does cause damage by facilitating back country use where enforcement and monitoring are challenging.	The BLM can not analyze the impacts of illegal activities. It is assumed that the public will adhere to the Travel Plan accompanying the DRMP/EIS.
Southern Utah Wilderness Alliance (SUWA)	124	22	ORV impacts to vegetation are largely ignored. For example, Chapter 4's discussion of this appears to be limited to two paragraphs, none of which is quantitative and none of which assess the probability of ORV's introducing and facilitating the spread of non-native species.	NEPA analysis for a landscape level document such as a land use plan analysis is done at a qualitative level and site specific quantitative analysis is not possible or practical. Chapter 4 analysis acknowledges that cross county OHV use can spread noxious weeds and can crush vegetation. This qualitative level of analysis is sufficient.
Southern Utah Wilderness Alliance (SUWA)	124	23	Chapter 4's discussion of soils at 4-279 and 280 provides that "no particular data on the distribution of biological soil crusts are available…" This lack of information is particularly troublesome because these soils are so important to the health of the desert ecosystem in the MFO.	See response to comment 124-17.
Southern Utah Wilderness Alliance (SUWA)	124	24	The plan never considers whether current or proposed ORV use levels are sustainable over the long run.	The BLM will continue to monitor the impacts to resources from all uses and will make adjustments as necessary.
Southern Utah Wilderness Alliance (SUWA)	124	25	The analysis of the impacts of ORV use and roads on cultural sites omits information that supports the use of methodology BLM employed to estimate impacts. For example, the cultural modeling used by BLM is inadequate. There is no information about whether there is any legal effect of the high, medium, low classifications or whether they are generally accepted by professionals in the field. The BLM is urged to conduct a full inventory of cultural sites and comply with NHPA.	The cultural model was developed by a BLM professional archeologist. The DRMP/EIS states on pg. 4-30 "while the site density prediction model used in this analysis is by no means a perfect predictor of site density it is sufficiently accurate (73% success rate) to be utilized as a tool for analyzing potential relative involvement of cultural resource sites in management decisions. A full cultural inventory is not required for a land use plan. Washington Office Instruction Memorandum 2007-030 states that a Class III inventory is not required for the designation of existing routes.

				Furthermore, FLPMA states that in the development and revision of land use plans the BLM should rely on the inventory of the public lands, their resources, and other values, to the extent such information is available.
Southern Utah Wilderness Alliance (SUWA)	124	26	"Based on consultation with Native Americans, the BLM would consider sites areas, issues, and objects important to their cultural and religious heritage." 1-13. There doesn't appear to be anything in Chapter 4 that reflects the BLM's considerations of these issues and what it did to accommodate Native American interests.	A summary of tribal consultation, including all meetings with tribal governments and specific issues raised by each tribe is contained on pgs. 5-4 through 5-11 in Chapter 5 of the Moab DRMP/EIS. A complete record of the consultations is available in the Administrative Record for the DRMP/EIS. The concerns raised by the tribal governments were addressed in one or more alternatives, where applicable. For example, the woodlands decisions allow the sustainable harvest (including cutting of green willows and cottonwoods) for Native American traditional ceremonial use.
Southern Utah Wilderness Alliance (SUWA)	124	27	Given the over 2600 miles of ORV trails the plan proposes to designate, the potential for soil erosion is significant. Soil erosion is one of the primary impacts of ORV use.	The alternative Travel Plans in the DRMP/EIS designate about 2600 miles of existing and constructed routes. In Alt C 123 miles of user made single track are designated for motorcycles. Impacts of OHV use on soils is extensively analyzed in section 4.3.13.7.
Southern Utah Wilderness Alliance (SUWA)	124	28	At 4-405, there's a list of resources that are not considered in the section on impacts to travel management on the theory that whatever BLM does to manage grazing, for example, or other types of recreation, won't impact travel. Wouldn't decisions to limit grazing based on riparian area destruction also impact ORV's. As would decisions to protect areas based on visual resources, or wildlife? Please provide an explanation for this approach.	Limiting grazing in riparian areas is considered on a case by case basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management. Restricting cattle in riparian areas is not directly related to OHVs. It is possible to restrict OHVs to designated routes, which minimizes impacts to riparian areas; however, cattle can not be limited in this fashion.
Southern Utah Wilderness Alliance (SUWA)	124	29	The EIS does not meet NEPA's requirements to analyze cumulative impacts and connected actions. The EIS for the plan revisions generally provides little or no discussion of cumulative impacts or the effects of connected activities on various resources.	The cumulative impacts of plan alternatives are analyzed in Chapter 4 of the DRMP/EIS. This analyses does not require speculation about the impacts from possible future activities. The BLM asserts that the analyses of cumulative impacts satisfies the requirements of NEPA.
Southern Utah Wilderness	124	30	The plan provides for high levels of both grazing and ORV use in canyon bottoms where riparian areas and	See response to comment 124-28.

Alliance (SUWA)			cultural sites are also prevalent. The BLM should identify the areas in which ORV use is permitted and discuss the combined effects of grazing and ORVs on these riparian areas.	
Southern Utah Wilderness Alliance (SUWA)	124	31	The plan notes that adverse effects from a variety of uses occur in Moab's riparian areas, and that reasonably foreseeable future uses will make it worse, but that mitigation would happen through implementation of PFC standards. There is no attempt to break down the assessment by alternative, or any real quantitative analysis. For example, on 4-282, there's a discussion of the significant adverse impacts to riparian areas from grazing. Can these same areas also sustanin ORV use?	See response to comment 124-28. The assumptions underlying this assertion are invalid. In the action alternatives of the DRMP/EIS, no open OHV use is allowed in riparian areas (pg. 4-425). In addition, under all action alternatives, no surface disturbing activities are allowed within 100 meters of riparian areas (pg. C-5).
Southern Utah Wilderness Alliance (SUWA)	124	32	The plan says that all alternatives would ensure PFC, and that "the loss or degradation of riparian areas, wetlands and associated floodplains would be avoided or minimized; natural and beneficial values would be preserved and enhanced; and fish and wildlife and special status species would be provided for," 4-182, there is no explanation of how ORV use in these same streams affects that conclusion.	On page 4-245 of the DRMP/EIS, the impacts of travel on riparian resources are analyzed. The acres of riparian areas by OHV designation are specified. No cross-county travel is allowed in riparian areas under any of the action alternatives. To provide further analyses, a table has been added to Appendix G of the PRMP/FEIS detailing the number of miles of routes not designated due to resource conflicts including riparian areas. This data has been incorporated into the appropriate resource sections of Chapter 4. In Appendix G of the DRMP/EIS it is acknowledged that OHV use in riparian areas can result in loss of vegetation, degraded stream banks, and erosion.
Southern Utah Wilderness Alliance (SUWA)	124	33	There are trails in riparian areas, and there doesn't appear to be any criteria or methodology by which riparian areas are chosen for protective measures against ORV use. While it appears that the BLM has focused on how strategies to protect riparian areas would adversely affect ORV use, it does not analyze how ORV use damages riparian areas.	An interdisciplinary team of resource specialists including representatives for riparian, wildlife, vegetation, and soils reviewed each route with a potential riparian conflict (see pg. G-23). Where potential conflicts were identified, the team determined the extent of the conflict and what mitigation might be appropriate. The identified resource conflict was then balanced against the purpose and need for the route for each alternative.
Southern Utah Wilderness	124	34	The EIS lacks any statement of purpose and need for the ORV trail designations. How many trails designated	The purpose and need for designating travel routes are discussed on pgs. G-12 and G-13. This discussion

Alliance (SUWA)			in the plan addresses the needs of non-motorized visitors. How many trails designated in the plan are for ORVs and how many for hikers?	provides all the criteria utilized for identifying the routes with a purpose and need. The interdisciplinary team considered these criteria in designating routes. The specific criteria utilized were not identified route by route. The needs of non-motorized visitors have been addressed in the plan by providing Focus Areas specifically for their use, identifying routes previously available for motorized use as restricted to non-motorized use (2,506 miles in Alt C), and greatly reducing the amount of open OHV areas. In addition hikers are not restricted anywhere on public lands.
Southern Utah Wilderness Alliance (SUWA)	124	35	At 2-17 under management common to all the language is vague and difficult to apply: "where unacceptable damage is anticipated or observed, BLM would seek to limit or control activities by managing the nature and extent of the ativity or by providing site improvements that make the activity more sustainable…Such management would seek to reduce or eliminate the adverse impact while maintaining the economic benefits associated with a wide range of recreation uses." Why not just adopt the language of the federal regulations which requires closure where adverse effects occur? The BLM doesn't know what the "economic benefits" of the range of recreational uses are, which deprives this standard of any real meaning.	The language on pg. 2-17 is under Recreation Management. This language refers to all recreation activities including but not limited to just travel. The purpose of the language, under actions common to all action alterntives, is to provide future flexibility under the plan for protection of natural and cultural resources from recreation activities, while maintaining the benefits of such activities to the community. The language referred to in the comment on closures is found under the Federal regulations at 43 CFR 8341.2 on Off-Road Vehicles. These regulations are referred to on pg. 2-48 of the DRMP/EIS under Travel Management. The economic benefits of recreation are analyzed in Chapter 4 on pgs. 4-266 through 4-272.
Southern Utah Wilderness Alliance (SUWA)	124	36	The plan admits that most recreation use occurs on 53% of the MPA, mostly close to Moab. 4-200. So the closures and relatively fewer trail designations around I-70 don't really do much to address the core ORV impacts; and those areas close to I-70 are open to leasing anyway, right?	The 53% of the MPA is proposed for management as SRMAs under one or more of the alternatives. It is erroneous to state that these are mostly close to Moab. For example, the Book Cliffs SRMA (348,140 acres) is located far to the north of Moab and I-70. The impacts of OHV use are primarily addressed by limiting OHVs to designated routes under all action alternatives. Permitted actions under oil and gas leases are mitigated through

				surface use restrictions and OHV use is often non-permitted.
Southern Utah Wilderness Alliance (SUWA)	124	37	Over one half of the wilderness characteristics lands in the Moab plan have VRMs of Class III or IV which would allow activities that will degrade wilderness values, and the area's world famous scenic vistas. Yet there is no rationale for the application of the Class III/IV designations. See 4-154 et seq and 164.	Under Alt B in DRMP/EIS all non-WSA lands with wilderness characteristics (WC; 266,485 acres) are managed for their protection and are managed at a minimum of VRM Class II. Under Alt C, 47,761 acres of these WC lands (266,485 acres) are managed specifically to protect these characteristics, and are managed as VRM II. However, in Alt. C, an additional 108,459 acres of these WC lands would be managed as VRM II based largely on the underlying visual resource inventory. The remaining 110,275 acres are managed as VRM III and VRM IV in Alt C and are also based on the underlying visual resource inventory.
Southern Utah Wilderness Alliance (SUWA)	124	38	The BLM avoids dealing with a range of important issues by declaring some beyond the scope of this plan. The issues of public education, enforcement/prosecution, vandalism, and volunteer coordination are not addressed but are critical to adequately analyzing the feasibility of implementing travel planning decisions and ORV route designations.	The items listed are admistrative actions and do not require land use planning decisions. The analyses assumes that there will be funding for implementation of the travel plan which will include public education, enforcement/prosecution, vadalism, and volunteer coordination.
Southern Utah Wilderness Alliance (SUWA)	124	39	Management of Wilderness Study Areas is also considered outside the scope of the plan. However, BLM should have a plan for management of these lands, which should include prescriptions for protecting WSA lands if they are released by Congress.	The DRMP/EIS states on pg. 2-43 that should WSA lands be released by Congress a plan amendment would be required prior to any actions. Therefore, specific decisions for released WSA lands are not detailed in the DRMP/EIS.
Southern Utah Wilderness Alliance (SUWA)	124	40	The Draft RMP should have analyzed and alternative with fewer ORV routes. It fails to include an alternative that would preclude ORV use in WSAs, proposed wilderness areas, non-WSA lands with wilderness characteristics, and other sensitive areas. There are only 512 miles of difference between the travel plan mileage in Alt B and Alt D. Thus the Draft RMP viloates NEPA's requirement that the agency provide a reasonable range of alternatives for the public to consider, and for the agency to analyze in order to make a fully informed decision.	Alt B precludes OHV use in WSAs and Wilderness Areas. In the 266,485 acres of non-WSA lands with wilderness characteristics proposed for management in Alt B, there are 117 miles of route designated. Although the range of alternatives for miles of road differs by 512 miles between B and D, the difference between A and B is 2,871 miles of road.

Southern Utah Wilderness Alliance (SUWA)	124	41	The Moab Draft RMP should have fully analyzed an alternative designating new Wilderness Study Areas. SUWA maintains that BLM has the authority and the responsibility pursuant to FLPMA at Section 202 to fully analyze an alternative that would designate new wilderness study areas.	The BLM does not have the authority to designate new WSAs under the land use planning process. The BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2))) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land, and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that the BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs.
Southern Utah	124	42	NEPA requires that BLM not limit its review to the 4	NEPA requires a reasonable range of alternatives in an

Wilderness Alliance (SUWA)			proposed alternatives. For example, BLM could decide to protect additional lands with demonstrated wilderness character or designate additional river segments as suitable for protection under the Wild and Scenic Rivers Act.	Environmental Impact Statement. The BLM contends that the 4 alternatives in the DRMP/EIS meet the requirement for a reasonable range. Alt B includes management prescriptions for all lands identified with wilderness characteristics and management prescriptions for all river segments found eligible as Wild and Scenic Rivers.
Southern Utah Wilderness Alliance (SUWA)	124	43	The Moab Draft RMP does not fulfill the minimization criteria required by law especially pertaining to the designation of OHV routes. The Draft RMP fails to provide an alternative avoiding potential environmental effects of designating particular routes. The plan does not provide equal recreational opportunities for non-motorized opportunities. The Draft RMP fails to analyze the cumulative effects of a wide spread designation of motorized routes.	Impacts to natural and cultural resources from designation of OHV routes have been minimized by weighing purpose and need against resource conflict on a route by route basis. Of the 6,199 miles of inventoried routes in Alt A, 2,871 routes are excluded from any of the action alternatives. While these 2,871 miles or routes were determined to have no purpose and need, resource conflicts with these routes were eliminated or avoided. Furthermore, these routes are now available for non-motorized use. In addition, more routes were eliminated in the action alternatives due to resource conflicts. It is not reasonable all routes with any resource conflicts; the purpose and need for the routes must be considered. Of the 1,821,374 acres of public lands within the Moab Field Office there are 353,615 acres of land designated as Wilderness Study Areas and 5,200 acres Congressionally designated as Wilderness. The WSAs and the Wilderness Areas are designated across all alternatives in the DRMP/EIS and are available for primitive and non-motorized use. In addition the DRMP/EIS includes SRMAs and Focus Areas managed for non-motorized recreation. The preferred Alternative (Alt C) includes three entire SRMAs for non-motorized recreation (Dolores River - 31,661 acres; Two Rivers - 29,839 acres; and Lower Gray Canyon - 3,759 acres). In addition to the non-motorized SRMAs, non-motorized Focus Areas in Alt C total 107,282 acres. Therefore, Alt C provides substantial opportunities for non-motorized recreation.

				The cumulative impacts of route designation are analyzed in Chapter 4 of the Draft RMP/EIS.
Southern Utah Wilderness Alliance (SUWA)	124	44	The BLM unjustifiably rejected the Red Rock Heritage Proposal. The BLM has dismissed the Red Rock Heritiage Proposal entirely not even incorporating any of the excellent recommendations into the conservation alternative.	Refer to response to comment 124-9.
Southern Utah Wilderness Alliance (SUWA)	124	45	BLM cites several factors for its wholesale dismissal of the Redrock Heritage Proposal (RHP). The first of these factors is the inclusion of B routes in the Redrock Heritage Proposal. BLM should have altered the RHP to include B roads as cherry-stems to the RHP alternative.	See Chapter 2 of the DRMP/EIS, page 108. BLM's rationale for its decision not to carry forward the Redrock Heritage Proposal in its entirety is clearly described in Chapter 2. BLM is not obligated to take an external proposal and analyze it in its entirety or to alter the proposal. The commentor assumes that BLM relied on only one of its criticisms for rejecting the RHP plan. For example, the commentor's comment concerning B roads suggests that BLM rejected the entire RHP plan simply because it would have eliminated county B roads. B roads are regularly maintained to passenger car standards; this maintenance is funded with state reimbursement. Although an important factor, BLM rejected the RHP plan in its entirety for the combination of reasons described in Chapter 2 (Alternatives Considered but Eliminated from Further Analysis). By eliminating B roads from its proposal, the commentor does not consider purpose and need for route designation throughout the field office. Cherry-stemming is a term used exclusively for WSAs and wilderness.
Southern Utah Wilderness Alliance (SUWA)	124	46	BLM cites several factors for its wholesale dismissal of the Redrock Heritage Proposal (RHP). One of these factors is the inclusion of SITLA lands in the Redrock Heritage Proposal. Where there is not B route access (sic), the BLM could reserve administrative access to SITLA lands without providing access to the general public.	See Chapter 2 of the DRMP/EIS, page 108. BLM's rationale for its decision not to carry forward the Redrock Heritage Proposal in its entirety is clearly described in Chapter 2. BLM is not obligated to take an external proposal and analyze it in its entirety. The commentor's proposal includes SITLA lands; BLM is obligated to provide reasonable access to SITLA lands based on Utah vs. Andrus. Furthermore, BLM cannot

				remove routes from SITLA lands.
Southern Utah Wilderness Alliance (SUWA)	124	47	BLM cites several factors for its wholesale dismissal of the Redrock Heritage Proposal (RHP). One of these factors is the focus of the RHP on BLM lands south of I-70. BLM should create more non-motorized opportunities near Moab.	See Chapter 2 of the DRMP/EIS, page 108. BLM is not required to create "roadless areas" in order to provide primitive recreation opportunities. Three WSAs are located within four miles of the city of Moab. In addition, there are two National Parks. Alt. C provides non-motorized focus areas near Moab (in the Colorado Riverway, Labyrinth and South Moab SRMAs.) Two non-WSA lands with WC areas are located near Moab. Alternative B provides 266,485 acres of non-WSA lands with Wilderness Characteristics. See also response to comment 124-43.
Southern Utah Wilderness Alliance (SUWA)	124	48	BLM cites several factors for its wholesale dismissal of the Redrock Heritage Proposal (RHP). One of these factors is the comparison of the RHP with the county inventory rather than with the BLM's Alt. C travel plan alternative.	See Chapter 2 of the DRMP/EIS, page 108. RHP does its analyses regarding distance from a road in comparison with the county inventory. The BLM reduced the miles of route by 2,871 miles by eliminating routes with no purpose and need. The BLM used purpose and need as well as resource conflicts to eliminate routes, as described in Appendix G. Creating "roadless areas" was not the intent of the BLM's route designation process. The RHP's route designation seeks first and foremost to create "roadless areas"by eliminating roads in areas proposed for wilderness in external wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	49	BLM cites several factors for its wholesale dismissal of the Redrock Heritage Proposal (RHP). One of these factors is that the RHP ROS analysis fails to account for topographic differentiation and such analyses unfairly impacts non-motorized recreation opportunities.	As stated clearly in Chapter 2 in the DRMP/EIS, pg. 108, ROS was not utilized by the BLM because the varied topography of the MPA results in greater opportunities for primitive, non-motorized recreation than would be indicated by ROS analyses. There is no requirement to use ROS.
Southern Utah Wilderness	124	50	BLM cites several factors for its wholesale dismissal of the Redrock Heritage Proposal (RHP). One of these	See Chapter 2 of the DRMP/EIS, page 109. The BLM cannot create new WSAs. While non-WSA lands may be

Alliance (SUWA)			factors is that SUWA assumes wilderness character lands can only be enjoyed without motorized access and discounts the near-town opportunities for enjoyment of these wilderness characteristics. SUWA agrees that near-town recreational opportunities afforded by the WSAs and their access points and the roadless lands within the national Parks are a valuable resource for primitive, non-motorized recreation. However, this is not a justifiable argument for denying protection for the wilderness quality lands in the other parts of the planning area.	managed to protect their wilderness characterstics, there is no requirement to do so. Many of the lands to which the commentor refers have been found to lack wilderness characteristics due to a plethora of routes. Other areas have been proposed for management of wilderness characteristics under Alt. B.
Southern Utah Wilderness Alliance (SUWA)	124	51	BLM cites several factors for its wholesale dismissal of the Redrock Heritage Proposal (RHP). One of these factors is that the BLM cannot create new WSAs. SUWA asserts that BLM can create new WSAs.	See Chapter 2 of the DRMP/EIS, page 109 and response to comment 124-41.
Southern Utah Wilderness Alliance (SUWA)	124	52	By excluding desingnation of new WSAs from the Draft RMP it risks violating FLPMA and NEPA and jeopardizes the validity of the entire planning process.	See response to comment 124-41.
Southern Utah Wilderness Alliance (SUWA)	124	53	Alt C does not sufficiently protect BLM roadless lands i.e. non-WSA lands with wilderness characteristics. Alt C only protects 10% of the non-WSA lands in the citizen's wilderness proposal. Until the wilderness issues is settled by legislative means, BLM should manage all wilderness characteristics areas to prevent actions causing degradation of their wilderness characteristics.	The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). However, the BLM may manage the lands to protect and/or preserve some or all of those characteristics through the land use planning process. In addition, under the land use planning process, the BLM must consider a range of alternatives for the lands identified with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these Non-WSA lands. If all alternatives contained comparable protections of the Non-WSA lands with wilderness characteristics, the alternatives would have substantially similar consequences and would not be significantly distinguishable.
Southern Utah	124	54	SUWA and others maintain that many wilderness	As part of BLM's wilderness characteristics inventory

Wilderness Alliance (SUWA)			quality lands have yet to be appropriately identified as possessing wilderness characteristics by the BLM. There remain some areas that the BLM has yet to conduct an appropriate on-the-ground inventory, and has instead relied on aerial photos (which tend to exaggerate impacts because vegetation patterns from old impacts are far more visible from the air than on the ground). SUWA contends that BLM has only performed a cursory assessment of these wilderness character units.	maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, Interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process (findings from this review are available on the Moab Field Office planning website, and in the Administrative Record). The BLM is confident of high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance. The BLM examined about 558,807 acres of lands proposed in the Red Rock Wilderness Act for the existence of wilderness characteristics. The BLM found that 266,485 acres of these lands contained wilderness characteristics and are proposed for protective management in Alternative B. The remaining 292,322 acres of the Red Rock proposal did not have wilderness characteristics based on the inventory maintenance conducted by the BLM between 1996 and 2007.
Southern Utah Wilderness Alliance (SUWA)	124	55	The BLM erroneously includes in its travel plan "naturally reclaiming and seldom used routes". The resultant damage caused by designating these routes would impact wilderness characteristics. Appendix D provides specific information on various routes and lands.	In formulation of the Travel Plan, the BLM specifically considered resource conflicts along with purpose and need for individual routes in the action alternatives. In these alternatives, the BLM identified over 2500 miles of currently available vehicle routes for non-motorized use. Furthermore, BLM reduces acreages in the areas “open” to cross country vehicle travel to nearly 0 and eliminates the category of “existing roads and trails” in all action alternatives. These proposed management actions would reduce the resource damage asserted by SUWA. It is beyond the scope of the plan for the BLM to create “roadless” areas where such areas do not currently exist.

				Rather the BLM evaluates routes for purpose and need balanced against resource use conflicts. A preference for a route not to be designated in order to create a "roadless" area is not in itself a resource conflict, let alone a conflict, which would always outweigh the purpose and need.
Southern Utah Wilderness Alliance (SUWA)	124	56	The BLM uses County route data as the boundary of naturalness for wilderness characteristics units. The BLM performed no on the ground inventory of these routes.	See response to comment 124-54 regarding inventory procedures. The County GIS route data used in the wilderness review process was verified by a combination of data and on-the-ground verification. An Interdisciplinary team reviewed data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process (findings from this review are available on the Moab Field Office planning website, and in the Administrative Record). The BLM is confident of high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance. See also response to comment 124-55 for reference to route specific comments.
Southern Utah Wilderness Alliance (SUWA)	124	57	The BLM must use the edge of the significance of disturbance rather than relying on arbitray boundaries to account for the full extent of wilderness characteristics. Aerial photograph can not be substituted for on the ground inventory.	The wilderness review process was verified by a combination of data and on-the-ground verification to determine areas of disturbance. An Interdisciplinary team reviewed data such as range files, County and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process (findings from this review are available on the Moab Field Office planning website, and in the Administrative Record). The BLM is confident of high-standard approach used to

				inventory the public lands and stands by its findings, particularly the findings which involved wilderness characteristics inventory maintenance. See also respone to comment 124-54.
Southern Utah Wilderness Alliance (SUWA)	124	58	The travel plan accompanying the DEIS violates the BLM's own rules for designating trails outlined in its 2006 "Clarification Guidance". The BLM has provided no definitions, criteria, or guidelines as provided by this guidance.	The Clarification Guidance referred to (Technical Reference 9113-1) was issued far after the Travel Plan was formulated. On pg. 6 of this document it states "The document does not address how to establish an appropriate route designation, evaluate environmental effects, perform a condition assessment, or decide when to add or remove a route. Rather the goal of the transportation route inventory is to identify and properly classify all existing routes whether planned or unplanned (user created)". This guidance is not mandatory and was not intended for travel route designation in the land use planning process.
Southern Utah Wilderness Alliance (SUWA)	124	59	The BLM simply "inherited roads and trails from Grand County maps and from off-road vehicle advocates in violation of the Clarification Guidance of 2006. In a meeting in Salt Lake City on October 3, 2007, the BLM staff informed SUWA that it has not visited each of the routes but simply relied on a statistical sampling technique to confirm the information on County maps.	As part of the scoping process for the DEIS/RMP, the BLM solicited route data from Counties and other interested parties. As described in Appendix G on pgs. 15 and 16, the BLM verified the routes provided from the public by statistical sampling and on the ground verification. The statistical sampling yielded a 99.7% accuracy rate at a 95% confidence level. Each of the verified routes was then individually reviewed for purpose and need weighed against resource conflicts. The BLM did not inherit roads and trails but rather examined each one individually.
Southern Utah Wilderness Alliance (SUWA)	124	60	The draft RMP does not demonstrate a full range of travel types. ORV routes total 2600 miles and hiking routes total 20 miles.	The needs of non-motorized visitors have been addressed in the plan by providing Focus Areas specifically for their use, identifying routes previously available for motorized use as restricted to non-motorized use (2,506 miles in Alt C), and greatly reducing the amount of open OHV areas. In addition hikers are not restricted anywhere on public lands. The commentor implicitly assumes that the routes

				identified in the BLM travel plan represent primarily “ORV trails”. In fact, routes are identified to serve a wide variety of travel needs (range, minerals, private lands access, wildlife projects, etc), although they are all available for recreation. Use of the term ORV implies that these routes are designated only for the more extreme forms of motorized recreation, when in fact most are passable by common street-legal vehicles.
Southern Utah Wilderness Alliance (SUWA)	124	61	SUWA can not identify the basis for specific route designations to confirm that the BLM has complied with legal and policy obligations.	There are over 33,000 route segments considered in the Travel Plan. Information on each of these segments is coded in a GIS data base which was provided to the commentor during the comment period for the DRMP/EIS. This information is publicly available at the Moab Field Office. It is impractical to include this volume of data within the covers of the DRMP/EIS document.
Southern Utah Wilderness Alliance (SUWA)	124	62	The BLM should only designate routes with distinct purpose and need south of the Mineral Bottom road. Redundant routes within areas found to possess wilderness characteristics should be closed. A wild buffer to protect Canyonlands National Park should be provided.	Several of the routes to which the commentor refers are not identified for motorized use in one or more action alternatives. The routes the commentor proposes closing consist almost entirely of routes lying within its wilderness proposals. As described in Chapter 2 of the DRMP/EIS, pp. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. Also, the BLM is not required to create buffers around National Parks.
Southern Utah Wilderness Alliance (SUWA)	124	63	The BLM should close the road along the Green River which accesses Hell Roaring Canyon (north of the airstrip) for the following reasons: 1) the route is seldom used, 2) the route in Hell Roaring Canyon is located in the floodplain and causes damage to riparian and water quality, 3) the route conflicts with non-motorized users in Labyrinth Canyon, and 4) designation of this route is inconsistent with management of the wilderness characteristics (WC) resource.	The commentor provides no evidence to support their assertions of resource damage and/or user conflicts. As described in Appendix G, the BLM used a interdisciplinary team to identify resource conflicts weighed against the purpose and need. The BLM stands by its route designation. The route the commentor proposes closing lies almost entirely within their wilderness proposal. As described in Chapter 2 of the DRMP/EIS on pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah	124	64	The BLM should close redundant low value routes on	In all action alternatives of the DRMP/EIS, the BLM does

Wilderness Alliance (SUWA)			Mineral Point to prevent habitat fragmentation, reduce user conflicts, and lower cumulative dust creation.	not identify for motorized use several of the routes in question, including routes found to be redundant. The routes the commentor proposes closing lie almost entirely within its wilderness proposal. As described in Chapter 2 of the DRMP/EIS on pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	65	The BLM should close all ORV use past the state land on Deadman Point to eliminate redundant routes and routes through lands with wilderness characteristics.	In all action alternatives of the DRMP/EIS, the BLM does not identify for motorized use several of the routes in question, including routes found to be redundant. SUWA provides no specific conflicts other than their wilderness proposal. The routes the commentor proposes closing lie almost entirely within its wilderness proposal. As described in Chapter 2 of the DRMP/EIS on pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	66	The BLM should close the road along the Green River north of Spring Canyon (to Hey Joe Mine). Motorized use on this road conflicts with comercial and private boating.	This route was identified as a road during the 1999-2003 wilderness inventory. It leads to a large disturbed mining area. It is a Jeep Safari route popular with motorized recreationists. The commentor provides no evidence to support their assertion of a conflict with hikers and boaters. The BLM made several visists to this route during Easter Jeep Safari. At the time of these visits the BLM observed very little motorized use or river use let alone any user conflict. The route the commentor proposes closing lies almost entirely within their wilderness proposal. As described in Chapter 2 of the DRMP/EIS on pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance	124	67	White Wash is a unique riparian ecosystem that is proposed as a open ORV play zone in the preferred alternative. The BLM admits to the uniqueness of this	The BLM recognizes the affected resources in this area. Alt B proposes closing the dunes to motorized use and creating an Area of Critical Environmental Concern. All

(SUWA)			system in alternative B. Nevertheless, BLM proposes to sacrifice this area. The BLM must manage this dune system to preserve it.	action alternatives propose significant reductions in the areas currently open to OHV use with mitigation to protect vegetative and riparian resources. This area lies within the commentor's wilderness proposal. As described in Chapter 2 of the DRMP/EIS on pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	68	The BLM has not recognized the statuatory mandate under FLPMA to give preference to ACEC designation. The agency must prioritize the designation of ACECs over other possible resource uses. For example, BLM cannot reject designation of an area as an ACEC because it is attempting to balance development and conservation in Alternative C.	The FLPMA states that in developing land use plans the BLM shall give priority to the designation and protection of ACECs. The BLM gave full consideration to the designation and preservation of ACECs during this land use planning process. Nominations for ACECs from the public were specifically solicited during the scoping period. A total of 37 ACEC nominations were received and the relevance and importance of each were determined. Fourteen of the ACEC nominations were found to meet both the criteria of relevance and importance and all these were included for special management as proposed ACECs in Alternative B. The BLM Manual 1613.23 states that “After completing the analysis of the effects of each alternative, the manager selects the preferred plan alternative which best meets the planning criteria and the guidance applicable to the area. The preferred alternative reflects the BLM’s proposals for designation and management of ACECs.” The BLM has full discretion in the selection of ACECs for the various alternatives. In the selection of the preferred alternative, a comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. Should BLM choose not designate potential ACECs, BLM Manual 1613 .33E provides direction in this process. Rational for not proposing designation of a potential ACEC in the preferred alternative must be provided, that is, the reasons for the decision not to provide special

				management attention must be clearly set forth. Such reasoning may include: 1. Special management attention is not required to protect the potential ACEC because standard or routine management prescriptions are sufficient to protect the Relevance and Importance Values from risks or threats of damage/degradation. 2. The area is being proposed for designation under another statutory authority such as wilderness and would require no further management attention. 3. The manager has concluded that no special management attention is justified either because of exposure to risks of damage to threats to safety is greater if the area is designated or there are no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. BLM ACEC guidance (Areas of Critical Environmental Concern; Policy and Procedures Guidelines, 45 FR 57318, 57319 (Aug. 27, 1980)) allows a manager to exercise discretion not to protect a potential ACEC through ACEC designation, but that decision has to be documented through the planning process. If the manager decides to provide the necessary protection through another form of special management, the documentation will include specifics of the special management proposed. Rationale for all ACEC decisions will be provided in the Record of Decision and supported by analysis in the EIS. If the decision is to allocate the resources with relevant and important values, in whole or in part, to another use which would in result in damage or loss to such resource, the authorized officer must first find that there is an overriding public need for such other use;

				that the public benefits of such other use outweigh the public benefits of use appropriate with ACEC designation, and that such other use will best meet the present and future needs of the American people. In addition, any allocations to such other use will include all feasible planning and management to prevent, minimize, mitigate or restore any consequent damage to the resource, and these requirements will be specified in the documentation.
Southern Utah Wilderness Alliance (SUWA)	124	69	If a recommended area is not to be designated as an ACEC, the analysis supporting the conclusion must be incorporated into the plan and associated environmental document.	The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The analysis that forms the basis of the rationale for the final decision to designate or not designate an ACEC can be found in Chapter 4 of the PRMP/FEIS.
Southern Utah Wilderness Alliance (SUWA)	124	70	The BLM has improperly ignored or discounted the threats to special places (ACECs) from oil and gas development and ORV use and has failed to designate or incorporate sufficient protection for proposed ACECs.	The BLM followed the ACEC designation process outlined in BLM Manual 1613 and analyzed the implications of designating or not designating areas as ACEC. In particular, in Chapter 4 of the DRMP/DEIS analyzes the impacts of ongoing and future uses on the relevance and importance values associated with potential ACECs under all alternatives. In addition, see response to comments 124-68 and 124-69.
Southern Utah Wilderness Alliance (SUWA)	124	71	The BLM has specifically failed to designate ACECs to protect lands with wilderness characteristics. SUWA believes that BLM's abandonment of its authority to designate any additional wilderness study areas (WSAs) is invalid and will ultimately be overturned in pending litigation and therefore does not prevent the BLM from designating new WSAs.	Pursuant to BLM Manual 1613, “An ACEC designation will not be used as a substitute for wilderness suitability recommendations”. The BLM does not have the authority to designate new WSAs under the land use planning process. Under the provisions of FLPMA, the BLM has authority to designate ACECs where special management attention is required to protect and prevent irreparable damage to important cultural, historic, scenic values, fish and wildlife resources, other natural systems or processes, or to protect life and safety from natural hazards. However to be considered as a potential ACEC, an area must meet

				the criteria or relevance and importance, which does not include wilderness characteristics (ACEC Manual at 1613.1). See also response to comment 121-10.
Southern Utah Wilderness Alliance (SUWA)	124	72	The BLM must designate all WSAs as ACECs to protect them should they be released from Congress.	Refer to response to comment 124-39.
Southern Utah Wilderness Alliance (SUWA)	124	73	Behind the Rocks - The ACEC in Alternative C should include the area overlapping the WSA as proposed in Alternative B.	BLM Manual 1613 gives rationale for not designating potential ACECs. This rationale includes that the area is being proposed for designation under another statutory authority. See response to comment 124-39 and 124-69.
Southern Utah Wilderness Alliance (SUWA)	124	74	Bookcliffs ACEC - The ACEC proposed in Alternative B must be carried forward to Alternative C based on the priority mandate in FLPMA.	See response to comment 124-68.
Southern Utah Wilderness Alliance (SUWA)	124	75	Cottonwood-Diamond Watershed ACEC - This ACEC should overlay the Bookcliffs ACEC so when the fire damage heals the land will be managed consistently with the wildife ACEC (Bookcliffs).	The Cottonwood-Diamond Watershed potential ACEC was proposed for the relevant and important values of natural hazards. The natural hazard resulted from fire damage. Wildlife was not one of the relevant and important values identified for this area. In addition this area is managed as a wilderness study area. Therefore, it is proposed for designation under another statutory authority which provides protection to the relevant and important values.
Southern Utah Wilderness Alliance (SUWA)	124	76	Dolores/Big Triangle - These two ACEC nominations should be combined to cross the threshold of importance for a wildlife corridor.	The BLM stands by its findings concerning the Dolores and Big Triangle ACEC nominations. Even if these areas were to be combined the wildlife habitat is not unique, rare, sensitive, or fragile. The habitat referred to was found to meet relevance but not importance because it is duplicated. See Appendix I, pgs 7 & 13 of the DRMP/EIS.

Southern Utah Wilderness Alliance (SUWA)	124	77	Gemini Poison Spider - This nomination meets the importance criteria for scenery. The vast expanse of Navajo sandstone fins and slickrock is equally important as a scenic resource as the Behind the Rocks ACEC or Mill Creek Canyon ACEC. This ACEC also gives protection to wilderness characteristics.	This area was found to meet the relevance criteria for ACEC consideration. However, the area did not meet the importance criteria for ACEC consideration because the scenery was found to be of no more than local significance as similar scenery is found throughout the Colorado Plateau. See Appendix I, pg. 13.
Southern Utah Wilderness Alliance (SUWA)	124	78	Hatch Wash - This canyon is geologically unique and important, where Wingate walls typically soar over vast expanses. The BLM should designate this as an ACEC.	Geology is not one of the relevant and important values for ACEC consideration. Hatch Wash did not meet the importance criteria for scenery because the scenery was of no more than local significance. See Appendix I, pg. 13.
Southern Utah Wilderness Alliance (SUWA)	124	79	Labyrinth Canyon ACEC - This ACEC should be included in the preferred alternative. It contains wilderness characteristics lands and is threatened by oil and gas development.	Refer to response to comment 124-69.
Southern Utah Wilderness Alliance (SUWA)	124	80	Mill Creek ACEC - The ACEC in Alternative C should include the area overlapping the WSA as proposed in Alternative B.	BLM Manual 1613 gives rationale for not designating potential ACECs. This rationale includes that the area is being proposed for designation under another statutory authority. See response to comment 124-39 and 124-69.
Southern Utah Wilderness Alliance (SUWA)	124	81	Tenmile ACEC - The potential ACEC must be managed to protect the critical riparian and cultural resources. Motorized travel is incompatible with this delicate riparian this delicate riparian environment rich in cultural resources.	The management of the ACEC for the protection of the riparian and cultural resources is compatible with motorized travel on the designated route. The route has been marked on the ground so travel along the existing route is adhered to and the potential for impacts to cultural and riparian resources has been minimized.
Southern Utah Wilderness Alliance (SUWA)	124	82	Upper Courthouse ACEC - The BLM identifies the relevance and importance in Appendix I. Therefore, they should give priority to its designation pursuant to FLPMA.	Refer to response to comment 124-69.
Southern Utah Wilderness	124	83	Westwater ACEC - This ACEC should be expanded to include the entire wilderness study area and added to	See response to comments 124-39 &124-71.

Alliance (SUWA)			the preferred alternative. This would provide protection should Congress release this area from WSA status.	The relevant and important values for the potential ACEC include fish and scenery. These values are found only along the Westwater Canyon corridor and only this corridor was included in the potential ACEC. The following sentence has been added to the PRMP/FEIS explaining why Westwater potential ACEC is not in the preferred alternative: "The area is proposed for designation under another statutory authority (wilderness study area) and requires no further management."
Southern Utah Wilderness Alliance (SUWA)	124	84	White Wash ACEC - The BLM identifies the relevance and importance in Appendix I. Therefore, they should give priority to its designation pursuant to FLPMA.	The following sentence has been added to the PRMP/FEIS explaining why the White Wash potential ACEC is not in the preferred alternative: "The manager has concluded that the threats from damage/degradation to the relevant and important values of natural systems can be protected through restrictions imposed in a Special Recreation Management Area (SRMA)." As stated on pg. 2-39 of the DRMP/EIS, this SRMA would manage the open OHV area with restrictions to protect the dune field Cottonwood trees and White Wash water sources.
Southern Utah Wilderness Alliance (SUWA)	124	85	Wilson Arch ACEC - The BLM identifies the relevance and importance in Appendix I. Therefore, they should give priority to its designation pursuant to FLPMA.	The following sentence has been added to the PRMP/FEIS explaining why the Wilson Arch potential ACEC is not in the preferred alternative: "The manager has concluded that the VRM II designation for this area is sufficient to protect the relevant and important values of scenery."
Southern Utah Wilderness Alliance (SUWA)	124	86	Upper Labyrinth ACEC nomination - SUWA nominates the area south of the town of Green River and north of the Ruby Ranch. The nominated ACEC that the Price BLM has on the west side of the Green River. This ACEC meets that relevant criteria due for scenic, historical, fish, and natural processes associated with the river and its surrounding landscape; historic values ranging from Crystal Geyser to the Powell expedition; and fish and wildlife habitat. The scenery and	The BLM considered this ACEC nomination which was submitted during the comment period for the DRMP/EIS. The values mentioned by the commentor in the Upper Labyrinth area are scenic, historical, fish, and natural processes. The BLM convened an interdisciplinary team to consider this nomination. The team found the historical, fish, and natural processes to be relevant. Scenery was not found to be relevant. While the canoe trip along the Green River is a highly sought after recreational experience, this portion of the Green River is

			landscape of this are is outstanding and offers visitors and outstanding experience either by hiking or by canoeing. The nomination meets the importance criteria for scenery and for historical values. In addition, the Green River is habitat to Threatened and Endangered fish and Labyrinth Canyon is an internationally acclaimed canoe trip through BLM lands. This area faces heightened threats from oil and gas development , with the state of Utah leasing portions of the riverbed.	only a portal to the scenery in the lower part of the canyon below Ruby Ranch. The relevant values of historical, fish, and natural processes were not found to be important. While John Wesley Powell did float this portion of the river, there were no significant events occurred in this portion from a historical perspective. The threatened and endangered fish that may inhabit this portion of the river are found throughout the Colorado and Green River system. This particular reach of the river provides no special habitat for these fish. The natural processes along this portion of the Green River are neither fragile, sensitive, rare, irreplaceable, exemplary, or unique. Because the nomination does not meet the importance criteria, it will not be carried forward as a potential ACEC in the PRMP/FEIS. The analysis supporting this conclusion has been incorporated into Appendix I of the PRMP/FEIS.
Southern Utah Wilderness Alliance (SUWA)	124	87	Highway 313 ACEC nomination - SUWA nominates the Highway 313 corridor as an ACEC. This ACEC would protect scenic values and cultural resources (Sevenmile Canyon) along Highway 313 from Highway 191 to Dead Horse Point State Park and spur of this highway leading to the Island in the Sky district of Canyonlands National Park. This ACEC meets relevant criteria due to this route being already designated as a Scenic Byway, and is the highly scenic gateway to two destination parks. Countless visitors experience this area as part of a larger southern Utah driving and windshield tour to enjoy the exceptional scenery of the landscape. The importance criteria are met by the exceptional scenery as well as by the designation of Highway 313	The BLM considered this ACEC nomination which was submitted during the comment period for the DRMP/EIS. The values mentioned by the commentor in the Highway 313 area are scenic and cultural resources. The BLM convened an interdisciplinary team to consider this nomination. The team found the scenic and cultural resoures to be relevant. The relevant values of scenic and cultural resources were not found to be important. While the scenery in the area is attractive it is of no more than local significance. Visitors enjoy the scenery along Highway 313 but their primary destination is the scenery of Dead Horse Point State Park and Canyonlands National Park. The cultural values, primarily rock art, in Sevenmile Canyon are found

			as a Scenic Byway. Travelers from all over the world use this route to access adjoining BLM lands and both Canyonlands National Park and Dead Horse State Park. The ACEC is found to have more than local significance. These values and quality of the Scenic Byway and ACEC are threatened and currently being degraded by visible oil and gas development.	throughout the Moab Field Office and the Colorado Plateau. These values are of no more than local significance. Because the nomination does not meet the importance criteria, it will not be carried forward as a potential ACEC in the PRMP/FEIS. The analysis supporting this conclusion has been incorporated into Appendix I of the PRMP/FEIS.
Southern Utah Wilderness Alliance (SUWA)	124	88	Generally, the suitability and classifications expressed for Wild and Scenic Rivers by the BLM in the Moab RMP/DEIS in Alternative B are supported by SUWA. SUWA strongly disagrees with the suitability findings and tentative classifications presented in Alternative C. All streams except the main stem rivers are dropped from suitability, and the tentative classifications for the main stem rivers are all downgraded to less protective classifications. There is no basis for downgrading suitability except attempts to make the preferred alternative more politically acceptable.	Alternative B emphasizes the protection/preservation of natural resources, thereby analyzing the impacts of finding all eligible river segments as suitable. Alternative C is the preferred alternative because it provides a balanced approach of protection/preservation of natural resources while providing for commodity production and extraction. As a result, Alternative B includes all eligible river segments as suitable with maximum protection provided for these segments. Alternative C provides for Wild and Scenic River suitability with less management restrictions to allow for more flexibility in considering other land uses. The BLM's Wild and Scenic River Manual (8351.33C) states "Alternatives may be formulated for any combination of designations or classifications. Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives, continuity of management prescriptions, or other management considerations." Appendix J fully discloses the review and evaluation process for determining which river segments are eligible and suitable for such designation.
Southern Utah Wilderness Alliance (SUWA)	124	89	Colorado River - The BLM suitability considerations in Appendix J suggest that suitability and classification on certain segments should be changed to reflect anticipated actions by private land owners included in the segment. However, the BLM does not have the jurisdiction over these private parcels and future	Of the total river miles in Segment 1 of the Colorado River (6.7 miles) only 1 mile is administered by the BLM. The lands are either privately owned or State administered. The suitability finding concluded that BLM could not properly manage this segment of the river for Wild and Scenic River consideration due to the large amount of

			possible actions by private landowners are not specified in the Wild and Scenic Rivers Act as justification for lower protective classification. Segment 1 should be suitable and classified as scenic. Segment 3 should be scenic for the entire stretch instead of recreational. Segment 5 should be scenic or wild. Segment 6 should be wild.	non-Federal property. The classification of a portion of Segment 3 was changed from scenic in Alt B to recreational in Alt C. This segment, which extends from Cisco Wash to the Dolores River confluence, contains large amounts of private lands. The classification change was intended to accommodate the potential for development on the private lands. This development could require rights-of way from the BLM for roads, power, and other infrastructure. The classification of Segment 5 was changed from scenic in Alt B to recreational in Alt C. Upon closer review, it was determined that the classification in Alt C should be changed to scenic in order to match the classification of scenic on the other side of the river in the Monticello Fiedl Office. This change has been made in the PRMP/FEIS. The classification of Segment 6 was changed from wild in Alt B to scenic Alt C due to evidence of past human activities.
Southern Utah Wilderness Alliance (SUWA)	124	90	Dolores River - Segments 1 & 2 should be classified as scenic and wild in the preferred alternative as they are in Alternative B. Segment 3 should be classified as scenic in the preferred alternaitve. There is no rationale for the recreational classification.	The tentative classification was established along each river segment during the eligibility review. This tentative classification is based on an inventory of existing characteristics of a river resulting from human caused change or level of development. The tentative classification is considered in Alternative B. However, because a river's tentative classification provides a framework for the management prescriptions applied within the area, some flexibility is allowed to consider a range of tentative classifications in the alternatives. Alternative C provides for a balance between protection and other land uses. Therefore, the classifications in Alternative C have been adjusted to provide for a wider range of alternatives (Manual 8351.32).
Southern Utah Wilderness	124	91	Green River - The preferred alternative of the MFO does not match the preferred alternative of Price.	The Moab Field Office (MFO) has coordinated with the Price Field Office (PFO) to ensure that the suitability

Alliance (SUWA)				determination for this segment of the Green River in the preferred alternative is consistent on both sides of the river. It was determined that the PFO would change their suitability findings to match that of the MFO.
Southern Utah Wilderness Alliance (SUWA)	124	92	Green River - Segment 2 (Alt B) should be classified as scenic. Although a route is visible it is primitive. Segment 4 should begin at Crystal Geyser and not the I-70 bridge and be classified as wild. There are no developments until Ruby Ranch. Segment 6 should be classified as wild to Mineral Canyon and as scenic from Mineral Canyon to Canyonlands National Park. The ORV route to Hey Joe should be closed. The route along the river north of Mineral Bottom should be closed.	The BLM stands by its inventory on tentative classification for the Green River. The level of development along this river includes roads, and past human activitiy including mining and agriculture. The roads mentioned in the comment are part of the existing inventory of impacts for tentative classification regardless of whether they are designated or not for travel. Segment 4 would be classified as scenic in Alt B. There is evidence of human activity throughout the segment.
Southern Utah Wilderness Alliance (SUWA)	124	93	All rivers found suitable in B should be carried forward to the preferred alternative for the following reasons: 1) Wild and Scenic protections aid watersheds, 2) perennial streams are a rarity, and 3) these streams are popular destinations for hikers and should be recognized for the outstanding recreational opportunities.	Refer to response to comment 124-88.
Southern Utah Wilderness Alliance (SUWA)	124	94	Tenmile Canyon should be found eligible and suitable for inclusion in the Wild and Scenic River System and should be classified as wild. The outstanding remarkable features are a rare perennial stream and riparian ecosystem and nationally significant cultural resource.	A review of all the rivers within the Moab Field Office was undertaken to determine which ones were eligible. Eligibility is an inventory step for agency planning. An interdisciplinary team determined that Ten Mile Canyon did not meet the eligibiliy standard. This documentation is available in the Administrative Record.
Southern Utah Wilderness Alliance (SUWA)	124	95	The BLM fails to consider known oil and gas locations in evaluating its oil and gas leasing stipulation alternatives and predicting oil and gas development. One shortcoming common to every alternative analyzed in the Moab Draft RMP is that the BLM has not endeavored to match predicted oil and gas development figures with the actual known geologic reserves of oil and gas. Instead, the BLM simply predicts future well numbers based on the total acreage available for leasing in each RFD area. If the BLM were	The geology of the Moab Field Office is described in the Mineral Potential Report for the Moab DRMP/EIS. As delineated by the oil and gas resource evaluation under the EPCA, the northern part of the Moab Field Office includes the southwestern portion of the Uinta Basin whereas the southern two-thirds includes the Fold and Fault Belt of the Paradox Basin. These areas have very different geology although both are defined as having high occurrence potential for oil and gas. Therefore, the entire area of the Moab Field Office has a high

			to analyze reasonably foreseeable development by acknowledging differentiating productive, known oil and gas fields from unproductive or unknown areas then it is likely that there may be little difference in the reasonably foreseeable prediction of well numbers in Alternative B. There is little or no basis for BLM's prediction that the various alternatives with fewer leasing stipulations will result in significantly larger amounts of wells over the course of fifteen years. The BLM must evaluate how the proposed leasing stipulations will actually impact access to the known oil and gas fields and reserves of the MPA. The BLM completely ignores no surface occupancy leases in this analysis, a critical failure as these leases may still allow for substantial access and development, possibly eliminating differences among alternatives.	occurrence potential for oil and gas. It is erroneous to assume that the known oil and gas fields shown on Map 3-1 of the DRMP/DEIS are synonymous with oil and gas reserves. The fields shown represent areas where there has been historical and ongoing oil and gas production. However, there is high potential for additional oil and gas development outside of the known fields across the entire Moab Field Office. Based on the geology and the knowledge gained from the known oil and gas fields, the Moab Field Office was divided into 7 development areas. New development within these areas is projected based on historical drilling, BLM experience, and communication with oil and gas operators. New development is expressed in the number of wells likely to be drilled in the area over the next 15 years. This development can occur anywhere within the development area and is not limited to oil and gas fields. Refer to the Reasonably Foreseeable Development scenario for oil and gas available on the Moab RMP website. The baseline projection of wells by development area is based on no restrictions. Stipulations on oil and gas leasing were developed by alternative to protect other resource values. The resultant restrictions result in a proportionate reduction in the number of wells throughout a given development area. This is the basis for the variability in the number of wells across alternatives. The analysis in Chapter 4 (pg. 4-84) of the DRMP/DEIS is based on acres of surface disturbance associated with oil and gas development. Since No Surface Occupancy areas would be precluded from occupancy of the surface for operations, no surface disturbance would occur in those areas. Therefore, the BLM fully considered No

				Surface Occupancy leases and their impacts in the analysis provided in the DRMP/EIS.
Southern Utah Wilderness Alliance (SUWA)	124	96	The BLM should consider an alternative that removes the NSO stipulations in the productive portions of the Greater Cisco RFD. The BLM must justify why the remaining stipulations in Alternative B would actually diminish oil and gas development.	The BLM has provided a reasonable range of alternatives for the oil and gas leasing stipulations. Any proposed management action analyzed within the range of alternatives can be selected in the Record of Decision for the RMP. The BLM does not see the need for creating a new alternative that combines elements of two existing alternatives. There are a multitude of possible combinations that could be formulated into new alternatives.
Southern Utah Wilderness Alliance (SUWA)	124	97	The following areas do not contribute to oil and gas production based on the known oil and gas fields and should be protected under all alternative: Labyrinth Canyon, the area south of the Colorado River and north of the La Sals, portions of Hatch Canyon and Harts Point, the areas with wilderness characteristics in the Bookcliffs, and the Arths Pasture, Big Flat, and Tenmile area.	See response to comment 124-95.
Southern Utah Wilderness Alliance (SUWA)	124	98	The BLM must consider a no leasing alternative. The current draft of the RMP fails to consider such an alternative. Federal courts have made clear that a no leasing alternative should be a vital component in ensuring that agencies have all possible approaches before them (See, e.g., Bob Marshall Alliance v. Hodel, 852 F.2d 1223, 1228 [9th Cir. 1988].	The BLM's consideration of the no leasing alternative has been added to Chapter 2 of the PRMP/FEIS under the section on Alternatives Considered but Eliminated from Analysis.
Southern Utah Wilderness Alliance (SUWA)	124	99	The BLM has not developed an alternative that anticipates the Utah Recreational Land Exchange Act with its mineral restirctions.	On pg. 2-11 of the DRMP/EIS states that lands and or interest in lands (such as mineral and conservation easements) acquired through future land tenure adjustments would take on the management of the surrounding area. Should the act be passed by Congress these acquired sections would be managed according to the will of Congress and in accordance with the management of the surrounding areas.
Southern Utah Wilderness Alliance	124	100	The BLM must take a hard look at the enviromental and recreational benefits of alternative B versus the potential foregone oil and gas.	Alt B emphasizes the protection/preservation of natural resources. The impacts upon natural resources from the various mineral alternatives are fully described in Chapter

(SUWA)				4. For example, the analysis of leasable minerals on wildlife on pg. 4-458 states that Alt B would have considerably more impacts to deer and elk than any other alternative. As another example, the analysis of mineral development on soils and water resources on pg. 4-290 states that based on the acreages detailed in Table 4.81 and 4.82 Alt B would have the least adverse impacts to soil and water resources due to mineral resource development decisions. For a final example, the analysis of minerals on recreation on pg. 4-202 states that Alt B would have fewer impacts because fewer acres within the Moab planning area would be potentially impacted by minerals exploration and development. More examples are available in Chapter 4. Nonetheless, the BLM contends that a hard look was taken.
Southern Utah Wilderness Alliance (SUWA)	124	101	BLM cannot dismiss consideration of directional drilling from existing wells. BLM must analyze directional drilling and require all operators to include a directional drilling alternative on a site specific basis. NEPA requires the BLM to consider the least environmentally damaging alternative. The Draft RMP should require all oil and gas projects to include a directional drilling alternative.	On a land use planning level across a large area it is not reasonable to consider an alternative that limits oil and gas development to directional drilling from existing well sites. The entire Moab planning area has a high occurrence and development potential for oil and gas. Based on current technology the DRMP/EIS assumes a directional drilling reach of 1 mile. Therefore, vast areas of the planning area with oil and gas resources would not be accessible and therefore would be closed to oil and gas leasing. The commentor provides no rationale regarding the resource conflicts that would warrant this restriction. Directional drilling is not conducive to all geologic and mineral environments. It is an option available at the site specific level and would be analyzed at the permit stage for drilling.
Southern Utah Wilderness Alliance (SUWA)	124	102	The total acreage of SRMAs in the planning area, by alternative differs in two Tables. Table 2.1 does not match the acreage in Table 4.69. Table 4.21 does not match the acreage in Table 2.1.	The acreage in the tables has been corrected in the PRMP/FEIS.
Southern Utah	124	103	The Draft RMP states on page 3-74 that "the areas with	The acreage of SRMAs in the No Action alternative totals

Wilderness Alliance (SUWA)			the greatest numbers of visitors and those that are in the greatest need of special management are currently within the Grand ERMA." BLM must choose the greatest expansion of SRMA acreage as provided in Alternative B in order to ensure that the MPA is directing its resources to these areas in need of special management.	141,252. In each of the action alternatives, this acreage is increased (Alt. B = 976,173 acres; Alt. C = 658,642 acres: Alt. D = 277,471 acres). The areas that receive the greatest visitation and are in greatest need of special management (Colorado Riverway, Sand Flats and Labyrinth Rims/Gemini Bridges) are all analyzed in both Alts B and C. The greatest differrence acreage between Alts B and C is the inclusion of the Bookcliffs SRMA in Alt B. The Bookcliffs is not an area with a great number of visitors nor does it require special management and is not an area referred to in Chapter 3 of the DRMP/EIS.
Southern Utah Wilderness Alliance (SUWA)	124	104	In Appendix F of the Draft RMP, SRMAs are assigned standards as to the physical, social, and administrative setting of each SRMA. There is no explanation for these standards. The Moab RMP should use the Recreation Opportunity Spectrum (ROS).	The BLM followed the Land Use Planning Handbook (H 1601-1) for Special Recreation Management Areas (SRMAs) at Appendix C. For each SRMA, the Handbook directs the following: 1) to identify a set of recreation opportunities, 2) to facilitate the attainment of different experience and benefit outcomes, and 3) to identify disctinctive recreation setting characteristics. The Moab Field Office utilized the traditional physical, social, and administrative settings from the Recreation Opportunity Spectrum (ROS). This process is summarized in Appendix F of the DRMP/EIS. Appendix F provides the goals, settings, outcomes, and management prescriptions for each SRMA. The format for considering ROS settings is currently taught in BLM's Recreation Planning Course at the National Training Center; Effective Engagement in the BLM Land Use Planning Process (NTC Course 8300-11). This approach is utilized extensively in other recent RMPs with the BLM. Washington Office Instruction Memorandum 2006-060 requires the BLM to utilize benefits based planning in land use plans. As part of this effort the BLM undertook to adapt the traditional Forest Service ROS to a more flexible framework. Benefits management requires BLM to prescribe the specific character setting of an area. The BLM decided to change ROS names to those more understandable to the public. These names are those used in the DRMP/EIS.

Southern Utah Wilderness Alliance (SUWA)	124	105	The Bookcliffs Special Recreation Management Area (SRMA) which is in Alternative B would protect recreational values and should be included in the Final RMP.	The commentor's preference that the Bookcliffs SRMA be managed as proposed in Alt B is noted. The State Director will make a decision based on consideration of public comments, analysis of the impacts, resolution of the issues, purpose and need for the plan, and the planning criteria. The BLM can choose management actions from within the range of alternatives. The primitive recreational opportunities in the Bookcliffs are largely protected by the management under Interim Management Policy for Lands Under Wilderness Review.
Southern Utah Wilderness Alliance (SUWA)	124	106	The Canyon Rims Special Recreation Management Areas (SRMA) should be expanded to include the Hatch Wash Focus Area.	The Hatch Wash Focus Area is included in the Canyon Rims SRMA as described in the preferred alternative.
Southern Utah Wilderness Alliance (SUWA)	124	107	The Colorado Riverway Special Recreation Management Area should be delinated with the extra acreage as outlined in Alternative B. SUWA objects to the establishment of any facilities or the improvements associated with the proposed BASEjumping focus area in Kane Creek, as the lands have been identified as possessing wilderness characteristics.	The commentor's preference that the Colorado Riverway SRMA be managed as proposed in Alt B is noted. The State Director will make a decision based on consideration of public comments, analysis of the impacts, resolution of the issues, purpose and need for the plan, and the planning criteria. The BLM can choose management actions from within the range of alternatives. The BLM's preferred alternative manages the most highly visited portion of the area as an SRMA. Any developed facilities associated with the proposed Basejumping focus area in Kane Creek would be along the maintained road. The jumping platform, while in an area identified with wilderness characteristics, would see only non-motorized activitiy. Furthermore, this area is not managed to protect wilderness characteristics in the preferred alternative. Non-motorized activities are allowed even within wilderness study areas as specified in the Interim Management Policy for Lands Under Wilderness Review.
Southern Utah	124	108	SUWA cautions BLM to not designate the Labyrinth	The commentor's comment regarding the Labyrinth

Wilderness Alliance (SUWA)			SRMA because it is biased toward motorized recreation and development. SUWA recommends the establishment of White Wash as a Hiking Area (as in Alt. B). SUWA would like to see the western half of Labyrinth managed as a primitive and undeveloped SRMA. SUWA recommends the Tenmile Hiking Focus Area as in Alt. B. SUWA takes strong exception to the establishment of a motorized focus area at Dee Pass as this area is proposed for wilderness in America' s Redrock Wilderness Act.	SRMA is an unfounded assertion. Under all action alternatives the BLM does not identify for motorized use a large number of vehicle routes within the area. Furthermore, all action alternatives place the area in question to a limited to designated routes category thereby reducing mortorized recreation opportunities from the no action alternative (Alt A). Much of the Labyrinth SRMA lies within a SUWA wilderness proposal. The BLM is not obligated to create roadless area in response to external preferences. The commentor's preference that White Wash and Ten Mile be managed as proposed in Alt. B is noted. The State Director will make a decision based on consideration of public comments, analysis of the impacts, resolution of the issues, purpose and need for the plan, and the planning criteria. The BLM can choose management actions from within the range of alternatives. The Dee Pass area is located within SUWA's Duma Point wilderness proposal. The BLM's Wilderness Characteristics Review (WCR) determined that this area lacked naturalness due to a profusion of constructed routes and other impacts. The commentor's responses to the BLM WCR findings in the DRMP/EIS did not include an objection to the BLM's findings of no wilderness characteristics for the Duma Point Unit.
Southern Utah Wilderness Alliance (SUWA)	124	109	SUWA recommends that the Slickrock Trail be closed to motorized use as is proposed in Alt. B. BLM should designate all the Special Recreation Management Areas (SRMAs) as described in Alt. B.	The commentor's preference that the Slickrock Trail and all SRMAs be managed as proposed in Alt B is noted. The State Director will make a decision based on consideration of public comments, analysis of the impacts, resolution of the issues, purpose and need for the plan, and the planning criteria. The BLM can choose management actions from within the range of alternatives.
Southern Utah	124	110	BLM must take a hard look at the issuance of special	The Moab DRMP/EIS analyzed a range of alternatives,

Wilderness Alliance (SUWA)			recreation permits (SRPs) on public lands. The Draft RMP does not explore direct, indirect or cumulative impacts of events and uses associated with SRPs even though they can have significant impacts.	which varied the number of vehicles associated with organized recreational groups from 15 vehicles for Alternative B to 50 vehicles for Alternative D. Chapter 4 of the DRMP/EIS on pg. 4-227 states that SRPs allow the BLM to impose protective stipulations on users, thereby protecting the resources present and reducing user conflicts. As the permits issued are increased, resource protection would also be enhanced. As stated on pg. 4-228 increasing the number of SRP with specific stipulations to protect and preserve cultural and natural resources would result in more protection and a less likelihood of impact. Land use planning is a tiered process ranging from broad general allocations and management prescriptions to subsequent site-specific authorizations. The issuance of a SRP is a site-specific implementation level authorization, which requires full compliance with NEPA, including analyzing the direct, indirect and cumulative impacts associated with each proposal.
Southern Utah Wilderness Alliance (SUWA)	124	111	The Moab Draft varies the number of vehicles that would require an organized group to obtain a Special Recreation Permit (SRP) by alternative. This is not the kind of range that NEPA contemplates. It is unreasonable for the only choice among alternatives to be whether 15, 25, or 50 vehicles as the threshold.	See response to comment 124-110. SRPs provide protective stipulations for public land users. These stipulations do not apply to the general public. Therefore, increasing the number of SRPs would be more beneficial in terms of reducing user conflict and protecting resources because there would be more protection and preservation related stipulations on cultural and natural resources. The BLM asserts that DRMP/EIS provides a reasonable and adequate range of alternatives on group size for SRPs.
Southern Utah Wilderness Alliance (SUWA)	124	112	The BLM must take a hard look at factors that should be considered for future Special Recreation Permits (SRPs). These factors are: 1) Duration of permit - SRPs should be temporary and	The Federal regulations at 43 CFR 2930 and the BLM Handbook (H-2930-1) govern the issuance of SRPs. Permit durations are managed according to BLM Handbook H-2930-1, and are tailored to the specific

			short term. 2) Number of vehicles permitted - BLM should revise its limits on the number of vehicles by type of vehicle. 3) Types of vehicles - BLM does not define what constitutes a vehicle. 4) Number of persons permitted - A threshold should be set for the number of people. 5) Location of SRPs - the Draft RMP should identify areas where SRPs would not be allowed which should include wilderness, wilderness study areas, non-WSA lands with wilderness characteristices, and lands being evaluated or managed for primitiveness. 6) Number of permits per year - there should be a cap on the number of SRPs within a specific area.	proposed use. The BLM has a range of threshholds for vehicles, by alternatives (see response to comment 124-110). These threshholds are intended as general guidance. The BLM Handbook, H-2930-1, allows management discretion based on individual circumstances. SRPs are analyzed on a site-specific basis. The BLM utilized the definition of off-road vehicles as defined by the Federal regulations at 43 CFR 8340. The BLM did not set a threshold of people because the impact of numbers of people varies by the type of proposed activity. These impacts will be analyzed at the site specific level when an SRP is applied for. The effects of SRPs on various categories of land management are analyzed at the site specific level. It should be noted that the Wilderness Act of 1964 allows for commercial services in wilderness areas. Non-motorized recreation activities, whether commercial or non-commercial, are allowed in wilderness study areas in accordance with the Interim Management Policy for Lands Under Wilderness Review. Limiting the total number of SRPs would reduce management flexibility to accommodate requested uses, and reduce the ability to control impacts from recreational activities. Refer to response to comment 124-111.
Southern Utah Wilderness Alliance (SUWA)	124	113	Transportation management within WSAs must minimize ORV motorized routes, which can impair wilderness characteristics.	Chapter 2, pgs, 2-43 and 2-44 summarizes travel management decisions with WSAs under the various alternatives. Alternative B does not identify any motorized routes with WSAs (termed “ways” in WSAs, as “roads” by definition are outside the boundaries of wilderness character), because this alternative closes all WSAs to OHV use. Alternative C identifies 2.55 miles of

				motorized routes in WSAs; these routes would be managed under Interim Management Policy for Lands Under Wilderness Review (IMP), and would be available only if they continued to meet the non-impairment standard imposed by IMP. Alternative D closes most WSA acreage to OHV use, but those areas not closed would be in the limited OHV category.
Southern Utah Wilderness Alliance (SUWA)	124	114	If released by Congress, BLM should manage WSAs to protect their wilderness characteristics (sic), rather than examine management of these areas on a case-by-case basis for consistency with the goals and objectives of the RMP.	Chapter 2, pg. 2-43 states: "Only Congress can release a WSA from wilderness consideration. Should any WSA, in part or in whole, be released from wilderness consideration, proposals in the released area would be examined on a case-by-case basis. All proposals inconsistent with the Interim Management Policy for Lands Under Wilderness Review would be deferred until completion of requisite plan amendments. Because a plan amendement would be required, there is no separate analysis in this Land Use Plan to address resource impacts if any WSAs are released." If WSAs lands are released by Congress, those lands would be managed to protect the wilderness characteristic until a plan amendment is prepared. At such a time, there would be opportunity for full public participation and input. The amendment would require a formulation of alternatives and environmental analysis similar to that of an RMP. See also response to comment 124-39.
Southern Utah Wilderness Alliance (SUWA)	124	115	The Draft RMP fails to analyze the impacts of climate change to MFO resources. Soil disturbing activities such as recreation, grazing, and energy exploitation reduce or remove the natural components that stabilize desert soil, increasing soil loss through wind and water erosion. The BLM should design alternatives that minimize soil disturbance. BLM should designate an alternative with far fewer than the 2600 miles of back country ORV routes that alternative C contains. The	A growing body of scientific evidence supports the concern that global climate change will result from the continued build-up of greenhouse gases in the atmosphere. While uncertainties remain, particularly in the area of exact timing, magnitude and regional impacts of such changes, the vast majority of scientific evidence supports the view that continued increases in greenhouse gas emissions will lead to climate change. This information was added to Chapter 3 of the PRMP/FEIS.

			cumulative effects of various uses like ORV recreation and grazing should be considered in the context of climate change. The BLM is urged to develop and adopt an alternative that minimizes the extent of soil disturbance and reduces the Field Office's vulnerability to the effects of climate change.	The EPA has not developed regulatory protocol or emission standards regarding global climate change. When these protocols and standards are available, the BLM will analyze potential effects to global warming in the NEPA documentation prepared for site-specific projects. All information to this effect was added to the PRMP/FEIS.
Southern Utah Wilderness Alliance (SUWA)	124	116	The BLM should ensure that scenic value is a resource that is conserved. All lands proposed for wilderness or with wilderness characteristics should be managed as VRM Class I. Lands within popular and easily accessible vantage points should be managed as VRM II. ACECs should be managed as VRM I or VRM II. All lands within America's Red Rock Wilderness Act should be managed as VRM I or VRM II.	The BLM has designated VRM management for the entire planning area within the DRMP/EIS. The scenic values of the planning area are placed in appropriate management classes by alternative . All Wilderness Study Areas are designated as VRM I. Non-WSA lands to be managed to protect their wilderness characteristics are designated as VRM II, as are many popular scenic attractions. Those ACECs that are proposed for management in Alt C are designated as either VRM I and II. The BLM has no obligation to designate all lands within the Red Rock Wilderness Act as VRM I or II. The BLM's VRM designations rely on the underlying VRM inventory.
Southern Utah Wilderness Alliance (SUWA)	124	117	BLM's analysis is remiss in its assessment of impacts from oil and gas and off-road motorized recreation "with 80% of the planning area open to both uses". Such uses "will have lasting, even permanent, impacts on the lands in the Moab Planning Area".	SUWA's comment is too general, and it relies on a false premise that BLM's alternatives "open" 80% of the planning area to oil and gas leasing and OHV use. In fact, as the DEIS describes in detail, all action alternatives identify for non-motorized use more than 2500 miles of currently inventoried motorized routes. All action alternatives reduce open OHV acreage to zero or close to zero. Rather than "opening" large areas of the MPA to OHV use, the action alternatives greatly reduce such areas, which in turn should reduce (not increase) the impacts SUWA asserts will occur. The reduction in impacts to a large number of resources which would result from adoption of any of BLM's travel plan action alternatives are described in detail in Chapter 4 of the

				DEIS. SUWA's comment that BLM fails to analyze the costs associated with of oil and gas leasing is unfounded. Chapter 4 uses the best available data to assess these impacts, and the associated cost (and benefits) of the various leasing action alternatives. Characterizing the MPA as being 80% "open" to oil and gas leasing blurs the real distinctions of the various leasing categories labeled as "open', which range from relatively unrestricted to no surface occupancy. SUWA provides no evidence to support their statement that the (misdescribed) BLM proposals for oil and gas and OHV management will have the lasting and permanent impacts
Southern Utah Wilderness Alliance (SUWA)	124	118	The analysis of social and economic impacts is entirely speculative.	Any assessment of the social and economic impact of a decision covering a 15-20 year timeframe will have elements of speculation. BLM used the best available data to assess impacts; in many cases, no data was available. In a landscape level plan such as the RMP, qualitative discussions are often all that are necessary (or even possible).
Southern Utah Wilderness Alliance (SUWA)	124	119	BLM must collect and analyze actual data on the economic impacts of the alternatives. BLM should use a specific data source suggested by SUWA.	SUWA's comment is too general. SUWA offers no specifics as to what "actual" data BLM failed to use, nor does SUWA provide any detail as to where BLM erred in its analysis. SUWA suggests that BLM should rely on the data sources and methodologies outlined in Socio-Economic Framework for Public Land Management Planning, published by the Wilderness Society. Most of the data sources described in this publication were used by BLM, especially in Chapter 3. The Economic Profile System (EPS), developed by the Sonoran Institute for the BLM, aggregates many of the federal data sources in The Wilderness Society's publication. Similarly, BLM

				incorporated the same Utah state government data sources as are included in The Society's document. Similarly, BLM used (preliminary) recreation data provided by the Forest service's NVUM data for the Moab Field Office. SUWA incorporates several of the recommended analyses of the Society's document; these will be addressed in the responses to comments which follow. The Wilderness Society is an advocacy group, and their recommendations are understandably focused towards their specific goals and objectives. BLM, on the other hand, must take a broader view under its multiple-use, sustained yield mandate.
Southern Utah Wilderness Alliance (SUWA)	124	120	BLM must include a fiscal analysis of alternative implementation and mitigation costs. The assumption that BLM would have the funding and workforce to implement the selected alternative is dubious. For example, an alternative resulting in resource damage will require more money to mitigate this resource damage than a less damaging alternative. It makes no sense for taxpayers to subsidize a more damaging and costly alternative when a less damaging, less costly alternative is available.	Chapter 4, page 3 states that BLM would have the funding and work force to implement the selected alternative. Implicit in this assumption is that BLM will seek and obtain funding for implementation and mitigation. BLM goes on to state: All decisions, projects, activities, and mitigation for the alternatives would be completed as described in Chapter 2 and Appendix C (Surface Stipulations Applicable to all Surface Disturbing Activities).There is no requirement in NEPA to do the detailed analysis SUWA request; this is an implementation issued outside the scope of the current planning effort.
Southern Utah Wilderness Alliance (SUWA)	124	121	BLM should choose a less costly alternative in order to save taxpayer money and mitigate resource damage. It makes no sense for taxpayers to subsidize a more damaging and costly alternative when a less damaging, less costly alternative is available.	SUWA's comment that BLM's as yet unchosen alternative will be more costly than the (unspecified) alternative SUWA prefers is unsupported, SUWA provided no evidence that BLM's proposed alternative (whichever one that is) would be more costly to implement than SUWA's (unspecified) alternative. Furthermore, the comment that BLM's alternative would cause more resource damage is also unsupported.
Southern Utah Wilderness	124	122	In order to fully comply with NEPA, BLM must include the costs of implementing each alternative, the costs of	See response to comment 124-120.

Alliance (SUWA)			mitigation plans within each alternative, the expected budget level and the probability of fully implementing the plan's mitigation measures. SUWA bases this demand on CEQ memorandum on NEPA requirements cited in NEPA Compliance Manual, 2nd Edition, 1994.	As evidenced by SUWA's citation presented in their comment, BLM is required in the EIS and ROD to indicate the "likelihood that such measures will be adopted or enforced by the responsible agencies." BLM will fulfill this requirement in the appropriate documents. SUWA's contention that this requirement means that BLM must calculate fully and compare the costs of each alternative is in error. The CEQ Guidelines for Implementation of the Procedural Provisions of the NEPA does not require preparation of a cost-benefit analysis for all EISs. The regulations state that "If (emphasis added) a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences (40 CFR 1502.23 Cost-benefit analysis). The Federal Land Policy and Management Act (FLPMA) requires that BLM manage the public lands for Multiple Use. Section 103 (c) of FLPMA defines Multiple Use as follows: "The term 'multiple use' means . . . Harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." Additionally, given that the implementation schedule for the RMP will vary in the future based on national priorities, available workforce, and funding, etc., there is no way to meaningfully evaluate costs and benefits of the alternatives. Therefore, a cost-benefit analysis is not central to the planning effort and is not required for consideration of multiple-use planning alternatives.

				After selection of an alternative to establish multiple use, costs and benefits of management actions may be considered, depending on priorities and funding. The BLM's National Planning Handbook (H1601-1) notes that even during implementation of land use plans "there is no requirement to develop a cost/benefit analysis, but management actions that have a high likelihood of improving resource conditions for relatively small expenditures of time and money should receive relatively higher priority (BM H-1601, IV. E. Developing Strategies to Facilitate Implementation of Land Use Plans).
Southern Utah Wilderness Alliance (SUWA)	124	123	The total planning acreage varies by alternative, which indicates the possibility that other data might be inaccurate or inconsistent.	SUWA admits that these variances are "not large", yet imply" systematic inaccuracy" in the acreage reported by alternative. SUWA provides no evidence to support their inference of systematic inaccuracy, nor do they define what constitutes such inaccuracy. The BLM states in Chapter 4, p.3:"Acreages were calculated using GIS technology; there may be slight variations in total acres between disciplines. These variations are negligible and will not affect analysis.
Southern Utah Wilderness Alliance (SUWA)	124	124	In order to accurately assess the potential impacts of the alternatives, the BLM must treat any additional oil and gas leasing as an industry gain, and compare all leasing alternatives to currently leased lands. The currently leased land should be regarded as the status quo, not any additional leasing that may take place under any of the alternatives. Comparisons of all the alternatives should be made against this status quo.	The DRMP in Chapter 4, page 82 states: "In accordance with BLM policy and its recognition of the National Energy Policy and Conservation Act of 2000 (EPCA), as discussed in Chapters 2 and 3, mineral resource development would be allowed throughout the Moab planning area subject to standard lease terms unless precluded by other program prescriptions, as specified in this Draft RMP." The commentor's proposal is basically to start from a "no lease" alternative, which BLM is not required to do. The No Action alternative (pg. 2-2 of the DRMP/EIS) "represents the continuation of existing managament under the current Grand Resource Area RMP(1985a), as amended". This plan provides allocations for oil and gas leasing. The current land use plan specifies the number of acres available for leasing with various restrictions.

Southern Utah Wilderness Alliance (SUWA)	124	125	BLM's socioeconomic analyses focus almost exclusively on the potential benefits of increased oil and gas drilling and off-road motorized recreation, without corresponding analysis of the costs associated with these activities. These costs include social impacts on local communities for example police and hospital services.	SUWA's premise in this comment is that the DRMP's "increase' the potential for leasing and for OHV recreation. (This alleged increase is presumably in comparison to SUWA's leasing and travel plan alternatives provided during scoping and not to any of the action alternatives in the DRMP). As described in detail throughout the DRMP. BLM's action alternatives place additional restrictions on leasing relative to the No Action alternative. Similarly, all action alternatives identify for non-motorized use more than 2500 miles of vehicle routes currently available for motorized use. Additionally, BLM reduces the amount of acreage "open" to unrestricted OHV use to zero or close to zero in all action alternatives. These actions would reduce the litany of alleged costs that SUWA enumerates in its comment. These reductions are in response to the potential resource conflicts identified in Chapter 4. BLM summarizes the (minor) costs and benefits associated with oil and gas development on local communities in Chapter 4, p. 260-264. SUWA's reference to the impacts such activities have had in other parts of the West is unlikely to apply to the MPA. The RFD predicts relatively few wells will be drilled, would employ relatively few people and produce negligible adverse social impacts. SUWA seems to be confusing the MPA with the large-scale development that has occurred in certain areas. BLM's analysis is based on the RFD; SUWA has provided no evidence that the RFD is incorrect. A recently completed study by the University of Utah concludes that less than 1 percent of the Grand County's economy is dependent on oil and gas activities, which corresponds closely to BLM's analysis in Chapter 3.
Southern Utah Wilderness Alliance	124	126	The BLM must make a full assessment of the social and economic costs that will accrue as a result of implementing the oil and gas drilling (sic) in the	See response to comment 124-125. SUWA seems to confuse the MPA oil and gas scenario

(SUWA)			alternatives as described in “The Economic and Social Impacts of Oil and Gas Development”.	with other places in the West such as Pinedale, Wyoming or Vernal, Utah, both of which have seen major positive and negative impacts from minerals development. As described in Chapter 4, BLM does not expect to see significant oil and gas development in the MPA over the life of the plan, and therefore does not expect major socioeconomic benefits or costs from these activities. BLM’s analysis is based on the RFD; if SUWA needs to provide evidence to support their contention. The document cited by SUWA is not a peer-reviewed manuscript, but an advocacy position published by the Wilderness Society. BLM has reviewed the publication, and has determined that there is no information which would altered the approach taken in the impact analyses of Chapter 4 in the DRMP. Many of the issues raised in the paper have been addressed in responses to other comments in this section. BLM believes that it is SUWA’s responsibility to indicate which specifics in the attached document are relevant to BLM’s planning efforts, and where failure to follow the document’s recommendations have resulted in error by the BLM. It should be noted that much of what the document discusses refers to very large scale oil and gas development, a scenario which the MPA RFD considers unlikely.
Southern Utah Wilderness Alliance (SUWA)	124	127	New businesses will be harmed or deterred from locating in the Moab planning area “by the potential single-use industrialization of vast public lands” under the preferred alternative in the Draft RMP EIS.	SUWA’s characterization of the BLM’s preferred alternative as “single-use industrialization” is unfounded. (Its phrase suggests that SUWA’s own travel plan, which identified more miles of motorized routes than any BLM action alternative, must be “super-industrialized”). BLM agrees that communities in the West rely less on natural resource extraction and more on non-commodity resources such as scenery and recreation opportunities. In its discussion of the impacts of minerals on socioeconomics, BLM emphasizes that the predicted

				activities would be relatively minor, and not likely to have significant impacts on local communities. In its discussion on the impacts of travel and recreation decisions on socioeconomics, Chapter 4, pp. 266-272, BLM outlines many of the potential benefits (and costs) to both local communities and visitors of the various action alternatives. BLM recognizes in Chapter 3, pp. 104-107, the importance of what the Sonoran Institute calls “The New West”, with its lower reliance on natural resource extraction. Throughout the DRMP, BLM recognizes the value of recreation and tourism to the local economy. BLM recognizes throughout its action alternatives the desirability of making decisions that will not adversely impact these all-important sectors of the MPA economy. SUWA implies that BLM’s preferred alternative will negatively affect the local economy, but offers no evidence to support that claim. It is worth noting that in another section of SUWA’s comments to the DRMP/DEIS, it asks the BLM to close all wilderness quality lands to commercial activities. This would include those guides and outfitters in the Moab planning area whose business relies to some extent on these areas. Many of these individuals are the very entrepreneurs for whose economic well-being SUWA expresses concern. It is worth noting the growth the MPA economy has enjoyed in the past decade, primarily in the areas of recreation and tourism, but also the presumably related second home market. This has occurred within the context of the current Grand Resource Plan (aka the No Action alternative, with its less restrictive leasing and OHV management). There is no reason to expect that a more restrictive environment for oil and gas leasing or OHV recreation (as would be the case in all action alternatives) would harm these industries.

				For the reasons outlined in Chapter 4, p.271, BLM believes that Alternative C (the Preferred Alternative) provides the greatest economic benefit to the MPA economy in the context of OHV management. BLM does recognize the potential for additional resource damage, as well as potential harm to the MPA economy from Alternative D's greater emphasis on motorized recreation. This is discussed explicitly in Chapter 4, p. 272.
Southern Utah Wilderness Alliance (SUWA)	124	128	The BLM must make a thorough examination of the full socioeconomic impacts likely to occur if the management alternatives are implemented. These impacts include impacts on the surrounding communities, including the costs of providing additional services, the long-term costs of the likely environmental damage, and the impacts on other sectors of the economy.	See response to comments 124-117, and 124-125 through 124-127. BLM has analyzed the socioeconomic impacts of its alternatives in Chapter 4. SUWA asserts that surrounding communities will have additional costs of providing services, but provides no evidence to support this claim. SUWA asserts that long-term environmental damage from BLM actions are "likely", but provide no specifics in this comment, let alone evidence. The socioeconomic section of Chapter 4 does analyze the impacts of BLM actions on the "other "(undefined by SUWA) sectors of the economy; that is the purpose of that section.
Southern Utah Wilderness Alliance (SUWA)	124	129	The Draft EIS does not account for the non-market values associated with undeveloped wild lands.	The non-market values to which the commentor refers are not available to the BLM. The studies of which the BLM is aware are based on designated wilderness, the results of which may or may not be generalized to other "wild lands". Even if the studies are generalizable to Wilderness Study Areas (WSAs), the impacts are irrelevant, since WSA management is outside the scope of the current planning effort. The BLM is unaware of any evidence that such studies are generalizable to non-WSA lands with wilderness characteristics FLPMA Section 202, (c) (4)states: "In the development and revision of land use plans, the Secretary shall…rely, to the extent it is available, on the inventory of the public lands, their resources, and other values."

				The BLM does recognize the potential importance of non-market values relative to managing for wilderness characteristics. The lack of available data makes quantification outside the scope of the DRMP/EIS. These values are discussed qualitatively in Chapter 4, pg. 265.
Southern Utah Wilderness Alliance (SUWA)	124	130	The BLM has an inherent responsibility to provide "public goods" in sufficient quantities to meet the demands of all U.S. citizens. These goods include opportunities for solitude, outdoor recreation, clean air, clean water, the preservation of wilderness, and other undeveloped areas.	the commentor may be correct if they are referring to the BLM on a national level, as opposed to the individual Field Office level. The BLM recognized its responsibility to provide such public goods, and believes it does so through its management actions. The BLM is not required in each field office to provide an adequate supply of these goods to meet the demands of all U.S. citizens, a clearly impossible task even if one were able to quantify such a demand. The BLM is required to provide for a multitude of uses, not all of which need be satisfied by every field office. The BLM believes that its action alternatives do provide the public goods SUWA demands, but probably not in the quantities it desires. For example, the Moab BLM manages approximately 350,000 acres of Wilderness Study Areas, a necessary ingredient of which is opportunity for solitude. The BLM provides within the alternatives a wide range of outdoor recreation activities, and recognizes recreation as the driving force of the planning area's economy. The BLM is required by law to adhere to the standards governing clean air and water, and will continue to follow such laws. The BLM has no statutory authority to "preserve wilderness" beyond those lands designated as such by law. The BLM will continue to manage WSAs under current policy to not impair their wilderness character, an action beyond the scope of the DRMP/EIS. Finally, the BLM has the option to manage non-WSA lands with wilderness characteristics, but not an obligation to do so. As described in Chapter 4,the BLM proposes varying amounts of acreage in Alternatives B

				and C for management to protect their wilderness characteristics. Whether that acreage is “enough” is a matter of preference, not law or policy. The public goods to which SUWA refers are provided in abundance within and in near proximity to the Moab planning area (MPA). In addition to the BLM management actions outlined above, other agencies and BLM field offices provide such opportunities. For example, Arches National Park, with over 75,000 acres of administratively endorsed wilderness, is 4 miles from Moab. The Manti-LaSal National Forest lies within 25 miles of Moab. Canyonlands National Park, with over 330,000 acres of administratively endorsed wilderness, lies about 25 miles driving distance from Moab. Adjoining Utah BLM field offices (Monticello, Price) contain 948,000 acres of WSAs all within a 1-2 hour drive from Moab.
Southern Utah Wilderness Alliance (SUWA)	124	131	The BLM must measure and account for changes in non-market values associated with the levels of oil and gas drilling in this RMP. To do otherwise omits a very important socioeconomic impact that is the direct result of management actions. The BLM must assess the non-market impacts on the owners of the lands in the Moab Planning Area-all Americans. This must include the passive use values of wilderness characteristics.	See response to comment 124-129. . The BLM does not dispute the value of non-market data. SUWA’s premise is that, were such non-market data available, it would show a “very important” socio-economic impact that is the direct result of management actions. As stated fully in the BLM’s response to comment 124-126, all the action alternatives place additional restrictions on oil and gas leasing in the Moab planning area (MPA) relative to the no action alternative. Furthermore, the projected level of oil and gas activities in the MPA is very low, with consequently low expected socio-economic impacts. SUWA’s demand that the BLM assess the non-market impacts of planning decisions on “all Americans” is impossible to quantify. The “passive use” value to which SUWA refers is another name for the non-market values discussed in the BLM’s response to comment 124-129.
Southern Utah	124	132	The significance criteria are incomplete because they	SUWA’s premise is that the action alternatives will

Wilderness Alliance (SUWA)			only consider employment and population. A complete analysis should include all sources of income (including non-labor income) and the impacts of alternatives on these components of income. This is because of the importance of such income to retirees who are likely to leave the area as public lands become "severely degraded by motorized recreation and oil and gas (sic)." This in turn will reduce non-labor income from these departing retirees.	produce degradation to public lands to such an extent as to dissuade individuals (specifically retirees) from relocating to, or staying in, the Moab planning area (MPA). SUWA's claim that the BLM's action alternatives will result in such degradation is unsupported by any specific information. See responses to comments 124-125 through 124-127. SUWA's claim that retirees are likely to relocate from the MPA is unsupported by any data or evidence. The BLM agrees that retirees are likely to be attracted to areas with natural amenities, but maintains that its planning decisions will not reduce such amenities, but should actually preserve and enhance them. Chapter 3, pgs. 103-104, discusses the importance of non-labor income and its potential association with natural amenities. See also response to comment 124-130. The BLM is unaware of any methodology which reliably projects non-labor income and its components in a specific area over a 20 year period, let alone any method which could predict changes in these components likely to result from the BLM's action alternatives.
Southern Utah Wilderness Alliance (SUWA)	124	133	The BLM must conduct an analysis of socio-economic impacts on incomes of businesses relying on the presence of protected public lands. It is "almost certain" that the reduction in acreage of lands being managed to protect wilderness characteristics from Alternative B to Alternative C "will result in vastly different social and economic conditions in the planning area".	Chapter 4, pg. 4-265, discusses the likely impacts on the local economy of the various alternatives for managing non-WSA lands with wilderness characteristics. The BLM is unaware of any methodology which would identify those specific businesses relying on "protected public lands". The BLM is unaware of how any of its action alternatives would negatively affect such businesses, and the commentor provides no evidence to the contrary. In fact, the commentor has asked the BLM to close these lands to commercial use (see response to comment 124-112), which would presumably negatively impact those businesses (such as guides and outfitters) whose incomes are most closely. The commentor does not provide any evidence to support its assertion that a

				reduction in the acreage managed for wilderness characteristics would result in “vastly different social and economic conditions”. The commentor repeats in this comment several misstatements from earlier comments. The commentor asserts that Alternative C reduces from 15.2 % to 2.6 % the amount of lands in the Moab planning area (MPA) managed to maintain wilderness characteristics”, and this is the reduction which will produce the negative impacts to those businesses relying on “protected public lands”. The commentor’s calculations ignore the primary component of “protected public lands” within the MPA, which is the approximately 350,000 acres of WSAs. Including this acreage in the category of protected public lands is a more meaningful measure of the actual acreage meeting this description. Similarly, the commentor once again refers to the “80 %” of BLM lands available for motorized recreation in Alternatives B and C. In fact, as repeated elsewhere in BLM’s responses to this commentor's comments, all of BLM’s action alternatives reduce the miles of routes available for motorized recreation by more than 2500 miles, and reduce the amount of acreage open to cross-country OHV use to zero or close to zero.
Southern Utah Wilderness Alliance (SUWA)	124	134	Section 4.3.12.2.10 fails to acknowledge that the vast majority of recreation visits to public lands are non-motorized and makes broad assumptions about the positive impacts of motorized versus non-motorized recreation. There are several instances where contributions to the local economy are implied to be attributable to motorized recreation.	SUWA provides no evidence to support its claim that ‘the vast majority” of recreation visits to the Moab planning area (MPA) are non-motorized. The only local data SUWA cites come from the 2007 National Visitation Use Monitoring (NVUM) study done for the Moab Field Office. All other data sources cited are either from areas outside the MPA, or aggregated to the extent that generalizing to the MPA is not possible. The NVUM study should not be considered a definitive snapshot of recreation activities in the MPA; see response to comment 124-2. It is not surprising, for example, that the top listed main activity

				was “Hiking / Walking/Trail run”. The design of the NVUM study resulted in 23 % of completed interviews occurring in Wilderness Study Areas, with the great majority of these interviews occurring specifically on the Negro Bill Canyon trail. Even if one assumes that the NVUM data are definitive, it is incorrect to assert that the data indicate the “vast majority” are non-motorized recreationists. For example, although the top two main activities are non-motorized, this does not mean that these respondents participated only in those activities while in the MPA. This is recognized in the NVUM study: “Because most BLM visitors participate in several recreation activities during each visit, participation rates usually exceed main activity rates. After identifying their main recreational activity, visitors were asked how many hours they spent participating in that main activity during this BLM visit. Table 16 only gives the hours spent when the activity was identified as the MAIN activity. Visitors who participated in this activity but not as a main activity might spend more or less time doing that activity (NVUM, p. 12).” The “several instances” in the DRMP/EIS cited by SUWA which “imply” that contributions to the local economy are attributable to motorized recreation consist of a single quote from Chapter 4. That quote (pg. 4-269) is very hedged, using terms such as “could be” and “it is possible”. Nowhere does the BLM say (or imply) that all (or even most) of the recreation impacts on the local economy are attributable to motorized recreationists. Rather, the BLM acknowledges that the different action alternatives tend to favor one type of recreationists over another. Throughout its action alternatives, but especially in alternative C, the BLM has sought to provide recreation

				opportunities and benefits for the wide variety of users, all of whom potentially contribute to the local economy. SUWA provides no evidence that any of the action alternatives will produce the negative impacts.
Southern Utah Wilderness Alliance (SUWA)	124	135	The analysis fails to break down spending between motorized and non-motorized recreationists. The BLM's own data indicate that the "overwhelming" number of visitors to the Moab area do not participate in motorized recreation.	See response to comment 124-134. the comentor mischaracterizes the National Visitation Use Monitoring (NVUM) data, which does not support the assertion of the "overwhelming" number of non-motorized visitors. The commentor seems to assume that recreationists to the Moab planning area (MPA) are cleanly divided into motorized versus non-motorized users, with members of one group never participating in activities associated with the other group. See response to comment 124-134. The commentor also seems to assume that the BLM has data indicating what each group (assuming that they are discrete entities) contributes to the local economy. The BLM has no data to separate out motorized versus non-motorized recreation spending, even assuming that the two groups are completely distinguishable. The commentor provides no evidence that the existence of such data would change any of the BLM's conclusions in Chapter 4.
Southern Utah Wilderness Alliance (SUWA)	124	136	The preponderance of evidence is that most visitors are engaging in non-motorized recreation, making it likely that most visitor spending is due to the non-motorized recreation opportunities in the MPA. It is likely that, as the landscape becomes overrun by off-road vehicles, these users are likely to choose other destinations. This impact must be analyzed as part of the Final RMP EIS.	SUWA's comment consists of a series of unfounded claims, each one of which depends on the validity of the immediately preceding assertion. The BLM does not dispute the likelihood that most visitors are engaging in non-motorized recreation, at least as part of their recreation activities in the Moab planning area (MPA). Except for the preliminary and non-generalizable National Visitation Use Monitoring (NVUM) data, the BLM has no means to be certain about this. The BLM has no data to support SUWA's next assertion that most visitor spending is due to non-motorized recreation. The BLM disputes SUWA's final assertion that the "overrunning" of the landscape by OHV users (presumably an impact of the BLM's action alternatives), will lead to a loss of visitation

				and visitor spending. Under the current management plan (the no action alternative) in the DEIS/RMP) the MPA has seen an explosive growth in its tourist and recreation-driven economy. Visitation and spending to date does not seem to have been deterred by the "overrunning" of the landscape that one might expect to be occurring (given SUWA's predictions) under current management. As has been repeatedly stated in these responses, all BLM action alternatives in the DRMP/EIS close more than 2500 miles of currently available routes to motorized recreation. All BLM action alternatives reduce to zero or close to zero the amount of acreage open to OHV cross-country travel. It is an extraordinary leap of logic to suggest that the great reduction in OHV opportunities incorporated in the action alternatives will contribute to degradation of the landscape and a loss of visitors and visitor spending. The BLM believes that its recreation and travel management alternatives will increase and enhance opportunities and benefits for non-motorized recreationists. The action alternatives dedicate more than 2500 miles of current vehicle routes to non-motorized use. The action alternatives designate varying miles of new mountain bike routes. The action alternatives close almost all of the MPA to cross-country OHV use, and eliminate altogether the category of "limited to existing roads and trails". Alternatives B and C create several hiking and mountain biking focus areas, and identify primitive hiking and backpacking SRMAs. Alternatives B and C close all inventoried ways within Wilderness Study Areas to motorized travel. The BLM under its multiple use mandate has considered the needs of a wide variety of recreationists in the DRMP/EIS alternative formulation.
Southern Utah Wilderness Alliance	124	137	Making 80 % of the Moab Field Office open to off-road vehicles is inappropriate given the small number of participants, the important values which will be lost to all	SUWA's operating premise that the DRMP/EIS action alternatives "make 80 per cent of the Moab Field Office open to off-road vehicles", and that these alternatives will

(SUWA)			Americans, and the potential high cost that will be imposed on Utah and the rest of the region from higher levels of off-road motorized recreation in the Moab planning area (MPA). Off-road motorized recreation has well-documented costs which have been "completely ignored" in the DEIS. These include (with literature citations) increased soils compaction and erosion and disrupted hydrological function, air pollution, impacts on vegetation, impacts on wildlife, foregone passive use benefits, foregone wilderness/roadless recreation benefits, personal injury and safety, law enforcement costs, and costs to taxpayers.	produce higher levels of off-road motorized recreation is false. See response to comments 124-133 and 124-135. As stated repeatedly in the BLM's responses to SUWA's comments, the DRMP/EIS action alternatives close more than 2500 miles of routes available to motorized use and reduce to zero or near zero the amount of acreage "open" to OHV use (Alt C leaves open 1,833 acres open to cross country travel). These facts differ from the 80 % figure SUWA repeatedly uses. SUWA's list of the costs associated with OHV use might be applicable to some other, unspecified BLM planning area, but they are not applicable to the Moab DRMP/EIS. As noted above, BLM's action alternatives greatly reduce the miles of routes and open areas available to motorized recreation. In fact, even the least restrictive alternative (D) identifies for motorized use fewer miles of routes than SUWA's own travel plan submitted to the BLM during scoping. Apparently, SUWA seems to ignore any OHV "costs" of travel on routes outside the lands it proposes for wilderness management. As described in detail in Chapter 4, the BLM addressed the impacts from travel management to a wide variety of resources under its management. SUWA provides no specifics as to where the BLM erred in its analysis, either for specific routes or specific resources. The impacts on resources analyzed in Chapter 4 of the DRMP/EIS included many of the resources enumerated by SUWA, including soils, air quality, hydrology, riparian, vegetation, wildlife, and wilderness characteristics. The BLM has never suggested that any of its management decisions are without impacts, including OHV and travel management decisions. The BLM believes that its action alternatives, which greatly reduce both miles of motorized routes and open areas, should have a positive impact on the resources cited. The BLM's responsibility is to

				disclose and analyze the effects of those decisions; the BLM has fulfilled this responsibility in the analysis disclosed in Chapter 4. Several of the costs and impacts enumerated by SUWA have been addressed in other responses to comments. The responses to comments 124-129 and 129-130 address the issue of passive use benefits. The responses to comments 124-133 and 124-134 address the issue of wilderness/roadless recreation benefits. The responses to comments 124-120, 124-122 and 124-128 address the issue of economic costs to BLM and to local communities. As regards SUWA's comment that BLM has ignored the risks to personal safety from OHV use, the BLM notes that it is beyond the scope of the plan to guarantee that individuals will follow commonly recognized OHV safety measures, as well as follow existing OHV laws and policies relating to safe operation. See also Chapter 1, pg. 11-13, for a discussion of issues beyond the scope of the current planning effort. The literature SUWA cites refers primarily to the impacts of cross-country travel, not to the impacts of restricting travel to designated routes as proposed in the DRMP/EIS. Several of the studies were done in ecological and/or geological settings not necessarily relevant to the Moab planning area. As stated above, the BLM has never implied that OHV use is without costs or impacts most of which result from unrestricted cross-country travel.
Southern Utah Wilderness Alliance (SUWA)	124	138	The BLM should not designate routes based on R.S. 2477 claims. The BLM must make decisions regarding motorized use base on its legal obligations to protect the resources of our public lands. The BLM should not designate routes merely because of R.S. 2477 assertions.	The BLM did not designate routes based on RS 2477 claims as evidenced by its non-designation of over 2500 miles of routes. Alternative A identifies 6,199 miles of routes while Alternative C identifies 3,693 miles of routes. The RS 2477 is discussed on pg. 1-12 of the DRMP/DEIS as an issue eliminated from further analysis because it is beyond the scope of the plan. The RMP does not adjudicate, analyze, or otherwise determine the validity of

				claimed RS 2477 rights-of-way. The BLM analyzed each travel route according to its purpose and need weighed against potential resource conflicts. This process is detailed in Appendix G of the DRMP/DEIS.
Southern Utah Wilderness Alliance (SUWA)	124	139	The Draft RMP does not present alternatives that would provide sufficient unfragmented habitat for wildlife. The Draft RMP should not only analyze the impacts of habitat fragmentation, but also consider and adopt a management alternative that substantially reduces the levels of fragmentation in the planning area. Under the preferred alternative, 74% of Gunnison sage grouse and 35% of greater sage grouse habitat remain affected. Even under the most protective alternative, Alt B, 69% of Gunnison sage grouse and 33% of greater sage grouse habitat remain impacted by fragmentation. Unde rall of the alternatives, there is no unfragmented or favorable habitat for desert bighorn sheep within the entire planning area.	DRMP/EIS provides a range of alternatives for the protection of wildlife habitats. Though fragmentation has been widely documented as causing an array of impacts to wildlife and their habitats, an alternative designed to provide totally unfragmented habitat is not a feasible and reasonable alternative. Fragmentation is an existing condition of wildlife habitat. To ensure that all federally listed, state sensitive, and big game species received adequate protective measures to protect habitats used for breeding, migration and the rearing of young, the BLM worked closely with the United States Fish and Wildlife Service and the Utah Division of Wildlife Resources to developed controlled surface use stipulations, seasonal and spatial buffers, habitat restoration plans and other measures that support Recovery Plans, Conservation Agreements, Conservation Plans and Recommendations, and Herd Management Plans. Other wildlife species, though not specifically addressed in the DRMP/EIS, will also benefit from the many management prescriptions in the preferred alternative. There are currently no active sage grouse leks within the Moab planning area. The DRMP/EIS on pg. 4-373 states that the planning area condition includes a large proportion of fragmented habitat. Of the action alternatives, Alt B would result in the least amount of additional fragmentation and its attendant impacts, followed by C, D and A in ascending order.

				Chapter 4 of the DRMP/EIS provides analysis of the impacts of habitat fragmentation on seveal wildlife species, including desert bighorn sheep on pgs. 4-482-486. The analysis concludes that Alt B results in the least amount of new habitat fragmentation. The DRMPEIS on pg. 4-484 recognizes that under all alternatives, "no unfragmented or favorable habitat exists within the Moab planning area."
Southern Utah Wilderness Alliance (SUWA)	124	140	The Draft RMP improperly underestimates the impacts of habitat fragmentation.	The fragmentation analysis is not an attempt to quantify the specific impacts from the fragmentation that has or will result from existing or new road use and energy exploration and development, but is rather a tool to understand the differing impacts among alternatives for future habitat fragmentation. The BLM has used the best available data to make an analysis of fragmentation differences among alternatives on a landscape level. Habitat fragmentation is one of many factors that play an important role in wildlife management decisions. Site specific impacts from future activities will be analyzed and when applicable, stipulations and mitigation measures may be implemented.
Southern Utah Wilderness Alliance (SUWA)	124	141	Managing lands to protect their wilderness characteristics reduces fragmentation and provides better habitat; the Draft RMP should acknowledge these benefits and consider more alternatives to protect habitat.	Chapter 4 of the DRMP/EIS on pgs. 4-379-380 and 4-463 acknowledges the benefits of management to protect wilderness characteristics. Alt B manages all non-WSA lands with wilderness characteristics to protect their natural values, including wildlife habitat. The DRMP/EIS provides a reasonable range of alternatives to protect habitat. In addition to those lands managed for wilderness characteristics, the Moab planning area includes designated wilderness and WSAs, which also provide unfragmented habitats for wildlife species.
Southern Utah Wilderness Alliance (SUWA)	124	142	The National Park Service should have been a cooperating agency. The exclusion of the NPS from cooperating agency status has limited the input from this most qualifed agency on the import of effects on	Cooperating agency status was extended to Federal, State, and local agencies, including the National Park Service. In addition to the cooperating agencies, the BLM Moab Field Office held meetings with and sought the

			Arches National Park and Canyonlands National Park.	input of other agencies that have land management jurisdiction within or adjacent to the planning area. In particular, the BLM conducted many coordination meetings with the National Park Service during the development of the DRMP/EIS in order to solicit its concerns. Although not a formal cooperating agency, members of the National Park Service staff worked closely with the BLM to resolve issues and address concern, when possible.
Southern Utah Wilderness Alliance (SUWA)	124	143	SUWA's Exhibit I is a site specific list of travel plan comments. A general point throughout Exhibit I is that SUWA believes a number of routes should be closed to motorized use for a variety of reasons.	The comments on the DRMP/EIS incorporated in Exhibit I are identical to the materials provided by the commentor during scoping. As was the case with the commentor's scoping submission, the comments address the Grand and San Juan County route inventories, and not the travel plan encompassed by the action alternatives. As such, the scoping comments as well as the comments received on the DRMP/EIS refer to Alternative A (No Action), as many of the routes in question are not identified for motorized travel in one or more action alternatives. Appendix G to the DRMP/EIS explains in detail the methods and tools used by BLM to formulate its travel plan alternatives. The road closures proposed by the commentor reflect their Red Rock Heritage Travel Plan, the BLM response to which can be found in Chapter 2, pgs. 108-109. Most of the routes proposed for closure by the commentor lie within its wilderness proposals. The commentor itself, in many of its specific route comments, expresses the concern that, were it not for the existence of the route(s) in question, the area would be roadless. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. Related to the above, many of this organization's

				comments call for a greater balance between motorized and non-motorized recreation. The BLM's action alternatives recognize this concern. OHV categories, in all action alternatives, greatly reduce the acreage currently "open", proposing that virtually all of it be in the "limited" category. Similarly, the BLM proposes in one or more action alternatives that all lands in WSAs be in the "closed" category; alternative B does not identify any vehicle "ways" for motorized use, while alternative C identifies 2.55 miles of routes. All action alternatives propose identifying more than 2500 miles of current vehicle routes for non-motorized use; all of these are potentially available for hiking, equestrian and bicycling use. The BLM's proposal identifies fewer miles of routes for motorized use than the Red Rock Travel Plan proposed by the commentor in scoping. All public lands remain open to hiking.
Southern Utah Wilderness Alliance (SUWA)	124	144	The BLM should close the upper RH Tusher route, as it has no need. It contains some of Utah's important wildlife habitat. The route is just a rough wash bottom. Access should be limited to oil and gas leasees.	The route in question is a constructed and regularly maintained County B road which accesses several state sections, and is also used by grazing permittees and recreationists. This route lies within a SUWA proposed wilderness area, which in effect would be "roadless", except for the fact that a route is present. Closing this route to motorized use would not make the area "roadless", as the impact on naturalness would still exist. It is beyond the scope of the plan for BLM to create "roadless" areas where such areas do not currently exist. Rather, BLM evaluates routes for purpose and need balanced against resource conflict. A preference for a route to not be present is not in itself a resource.
Southern Utah Wilderness Alliance (SUWA)	124	145	The route up Floy Canyon should be closed above the ranch. Closing this route would help maintain wildlife and non-motorized recreation.	The route in question is not identified for motorized use in Alternatives B or C.

Southern Utah Wilderness Alliance (SUWA)	124	146	The route up Nash Wash should be closed. This route is blocked by private land.	The route in question is not identified for motorized use in Alternatives B or C.
Southern Utah Wilderness Alliance (SUWA)	124	147	The route in Diamond Canyon should be closed above the ranch.	The route in question is a constructed and regularly maintained County B road. The route in question is not identified for motorized use in Alternatives B or C beyond the end of the B road.
Southern Utah Wilderness Alliance (SUWA)	124	148	The route in Cottonwood Canyon should be closed above the ranch.	The route in question is a constructed and regularly maintained County B road. The route in question is not identified for motorized use in Alternatives B or C beyond the end of the B road.
Southern Utah Wilderness Alliance (SUWA)	124	149	The BLM should close most routes on the flank of South Mountain, especially to improve deer habitat.	As part of its travel plan formulation process, the BLM conducted numerous meetings with its ID team, which included wildlife specialists. Additionally, the BLM consulted with Utah DWR on all aspects of its plan, including travel. The problems cited by the commentor were not raised as resource conflicts.
Southern Utah Wilderness Alliance (SUWA)	124	150	The BLM should close many routes in lower Sagers Wash, as the routes serve little purpose and lie in sensitive soils.	In all its action alternatives, the BLM closes numerous routes to motorized travel due to conflicts with sensitive soils.
Southern Utah Wilderness Alliance (SUWA)	124	151	Many routes on Dome Plateau should be closed to motorized travel, since they are redundant and pose resource conflicts. Closing these routes would maintain opportunities for non-motorized recreation and protect deep microbial crusts and other soils.	The routes the commentor proposes closing consist almost entirely of routes lying within its wilderness proposals. There is no distinction made on the basis of use, and the proposal includes closing county B roads and popular permitted motorized routes. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	152	The BLM should close routes on Dry Mesa in order to “create a rare remote and wild area”. This would also protect the viewshed from Arches National Park.	Many of the routes on Dry Mesa are not identified for motorized use in one or more action alternatives. The routes the commentor proposes closing consist entirely of routes lying within its wilderness proposals. There is no distinction made on the basis of purpose or need. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to

				wilderness proposals. The BLM has proposed viewshed protection surrounding Arches National Park in all action alternatives of the DRMP/EIS. Travel on designated routes is not considered an impact to the viewshed of Arches because it is not a permanent surface disturbing activity.
Southern Utah Wilderness Alliance (SUWA)	124	153	The BLM should close the Winter Camp Ridge route to motorized travel to create non-motorized recreational opportunities. This route does not lead to a good view point or logical destination.	This route accesses Arches National Park; contrary to the commentor's assertion, it leads to a spectacular viewpoint above Salt Wash. The route in question lies within a SUWA wilderness proposal. As described in Chapter 2, pg. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	154	The BLM should close a "user-created" Jeep Safari route in the southwest part of the Dome Plateau area because "it intrudes into a high-priority non-motorized area".	As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. This route has a demonstrated purpose and need as it is part of the permitted route system.
Southern Utah Wilderness Alliance (SUWA)	124	155	The BLM should close the route on Fisher Mesa because of its scenic qualities, wildlife values, and opportunities for non-motorized recreation.	The route in question leads to a large chained area, and accesses several stock ponds and a state section. The route itself was "cherry-stemmed" in HR 1500 (which formed the basis for the 1999-2003 wilderness inventory), presumably for these reasons stated above. The BLM interdisciplinary team, reviewing travel routes, did not identify resource conflicts with the Fisher Mesa route. Furthermore, the commentor did not provide any evidence regarding the conflicts it refers to.
Southern Utah Wilderness Alliance (SUWA)	124	156	The BLM should close routes on Adobe Mesa. People in Castle Valley would like this route closed and there is no purpose and need for the route.	In all action alternatives, the BLM does close redundant routes on Adobe Mesa for motorized use. The main route on Adobe Mesa remains open under all action alternatives. The routes the commentor proposes closing consist entirely of routes lying within their wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. The BLM has received no indication from residents of

				Castle Valley that they would like routes on Adobe Mesa closed.
Southern Utah Wilderness Alliance (SUWA)	124	157	The BLM should close routes in the vicinity of Mary Jane and Fisher Canyons. Vehicle routes are few and seldom used, as they do not lead to anything and are not especially enjoyable or challenging drive.	In all action alternatives, the BLM does not identify the majority of inventoried routes for motorized use in this area. The routes the commentor proposes closing consist almost entirely of routes lying within their wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	158	The BLM should close a variety of routes on Top of the World and Seven Mile Mesa, as they "intrude into priority non-motorized areas".	In all action alternatives, the BLM closes a number of routes to motorized use on these mesas, due to a lack of purpose and need. As the commentor acknowledges in its comments, the routes to be closed consist of routes lying within its wilderness proposals. As described in Chapter 2, pgs. 108-109, BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	159	There are too many redundant routes in the Dolores Triangle, and these should be closed by the BLM.	The routes the commentor proposes closing consist almost entirely of routes lying within its wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	160	The BLM should close access routes beyond the campground near Castle Rock, and close routes in the upper part of Castle Valley. The BLM should look at the Castle Valley road plan.	In all action alternatives, the BLM does not identify for motorized use several of the routes in question near Castle Rock. In upper Castle Valley, the BLM proposes not identifying redundant routes. The commentor's proposal closes all routes, including access to State lands and occupied private property, with no distinctions made as to purpose and need. The BLM has not received a route proposal from the town of Castle Valley.
Southern Utah Wilderness Alliance (SUWA)	124	161	The BLM should close routes on Porcupine Rim and Mat Martin Point "in order to preserve the entire area for non-motorized use". Motorized use is resulting in lessening the appeal for bikers and walkers.	In all action alternatives, the BLM does not identify for motorized use several of the routes in question near Castle Rock. In one or more action alternatives, the BLM identifies for non-motorized use routes within the Negro Bill Canyon Wilderness Study Area. The routes the commentor proposes closing consist almost entirely of

				routes lying within its wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. The commentor's assertion regarding the impacts to bikers and walkers from motorized use is unfounded.
Southern Utah Wilderness Alliance (SUWA)	124	162	The BLM should close most routes in the Beaver Creek area. The routes are rarely used and the area is excellent habitat for wildlife.	The routes the commentor proposes closing consist almost entirely of routes lying within their wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. The BLM has closed routes with resource conflicts in this area that were found to have no purpose and need and
Southern Utah Wilderness Alliance (SUWA)	124	163	The BLM should close a number of routes in the Sand Flats area to protect non-motorized recreation. The Hells Revenge route should be closed. SUWA suggests that BLM incorporate the expertise of the Sand Flats team.	As is true of most of the commentor's comments on the DRMP/EIS, SUWA appears to be addressing the county road inventory, and not BLM's travel plan. The assertion that some of these routes are causing damage to the Wilderness Study Area is unfounded, and the BLM has ample evidence to the contrary. The Slickrock Trail would be closed to motorized use under one action alternative. However, it is closed to jeeps in all action alternatives. The Hells Revenge Jeep Trail is one of the most popular jeep routes in the area, and a major commercial activity for guided trips. The Sand Flats team is a Grand County entity and thus a cooperator in the BLM's planning effort; the BLM has considered its input. Many of the routes the commentor proposes closing lie within its wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	164	The BLM should close routes in the Mill Creek area. ORV use in the streambed is highly damaging to riparian and cultural resources. ORVs affect water quality, stream bank erosion, habitat, and Moab's water supply.	The commentor provides no evidence of its assertion of OHV damage in the streambed. As described in Appendix G, the BLM's travel plan formulation involved numerous meetings of an interdisciplinary ID team (including vegetation, riparian, wildlife, and hydrology

				specialists). Potential resource conflicts were identified, their extent evaluated and then weighed against purpose and need for the particular route under discussion. The routes the commentor proposes closing consist almost entirely of routes lying within its wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	165	The BLM should close a number of routes west of Westwater, which serve no purpose or need and "intrude on a priority non-motorized area".	Several of the routes to which the commentor refers are not identified for motorized use in one or more action alternatives. The routes the commentor proposes closing consist almost entirely of routes lying within its wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	166	The BLM should close less-used routes that encroach on roadless areas of Arches National Park to enhance non-motorized recreation.	Several of the routes to which the commentor refers are not identified for motorized use in one or more of the action alternatives. The routes the commentor proposes closing consist almost entirely of routes lying within their wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	167	The BLM should close many of the side routes of Utah Highway 313 for visual resources, vegetation, soils, and cultural conflict reasons.	Several of the routes to which the commentor refers are not identified for motorized use in one or more action alternatives. Several others are routes lying within their wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. As described in Appendix G, the BLM's travel plan formulation involved numerous meetings of an interdisciplinary team (including vegetation, soils, wildlife and cultural resource specialists). Potential resource conflicts were identified, their extent evaluated, and then weighed against purpose and need for the particular route under discussion.

Southern Utah Wilderness Alliance (SUWA)	124	168	The BLM should close most of the routes on the Bull Canyon rims, as they serve little purpose and are barely used.	Several of the routes to which the comme ntor refers are not identified for motorized use in one or more action alternatives. Several others are routes lying within SUWA's wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	169	The BLM should close most routes in the Bull Canyon bottoms to enhance non-motorized recreation.	Several of the routes to which the commentor refers are not identified for motorized use in one or more action alternatives. The route below Gemini Bridges will be closed under all action alternatives.
Southern Utah Wilderness Alliance (SUWA)	124	170	The BLM should close a number of routes on Goldbar Rim and Poison Spider Mesa to enhance non-motorized recreation.	Several of the routes to which the commentor refers are not identified for motorized use in one or more action alternatives. The principal route to which the commentor objects is a very popular permitted 4WD route. As described in Appendix G, the BLM's travel plan formulation involved numerous meetings of an interdisciplinary team. Potential resource conflicts were identified, their extent evaluated and then weighed against purpose and need for the particular route under discussion. Several of these are routes lying within SUWA's wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	171	The BLM should close a number of routes in Shafer Canyon to protect the viewshed from Dead Horse Point. It also hosts bighorn sheep and Mexican spotted owls.	The routes the commentor proposes closing consist almost entirely of routes lying within its wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. As described in Appendix G, the BLM's travel plan formulation involved numerous meetings of an interdisciplinary team. Potential resource conflicts were identified, their extent evaluated and then weighed against purpose and need for the particular route under discussion.

Southern Utah Wilderness Alliance (SUWA)	124	172	The BLM should close most of the route in Mineral Canyon, as “this is a good place for quiet recreation”.	One or more action alternatives identify this route for motorized use only up to the state section in Mineral Canyon.
Southern Utah Wilderness Alliance (SUWA)	124	173	The BLM should close the route along the Green River to Hell-Roaring canyon to mitigate the “large conflict with non-motorized use in this canyon."	The commentor provides no evidence to support its assertion of the "large conflict". The route above the State section in Hell Roaring Canyon is closed to motorized use in one or more action alternatives. The route the commentor proposes closing lies within its wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	174	The BLM should close the route to Hey Joe Canyon along the Green River because of conflicts with non-motorized users. There is a long tradition of both commercial and private non-motorized use of the river. These uses are being harmed by the noise of motors along the Hey Joe route.	This route was identified as a road in the 1999-2003 wilderness inventory. It leads to a large disturbed mining area. It is a permitted route popular with motorized recreationists. The “long tradition of non-motorized use of the river” to which the commentor refers is irrelevant to the existence of a route which has been in use for nearly 50 years. The commentor provides no evidence to support its assertion of harm to commercial businesses that use this area. The BLM made several documented visits to this route during a recent Easter Jeep Safari ; at the time of these visits, the BLM observed very little motorized or river use, let alone user conflict. The route the commentor proposes closing lies within their wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	175	The BLM should close the route in Ten Mile Canyon to protect riparian and cultural resources. The extreme well documented and steadily increasing damage to this place can only be mitigated if the canyon is closed to motorized use.	See response to comment 124-81. This route, very popular with motorized recreationists, is not identified for motorized use in one or more action alternatives. The current travel route has been heavily signed to minimize damage to riparian and cultural resources. Side routes accessing cultural resources have

				been closed to motorized travel. The route the commentor proposes closing lies within its wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	176	The BLM should close many of the routes leading to "points" along the Labyrinth Canyon rims, leaving a few available for "quiet recreation".	The commentor proposes closing to motorized travel a large number of routes covering a large land mass. Many of these routes do access popular viewpoints, and are described in guidebooks. The BLM has recognized the needs of non-motorized recreationists by not identifying for motorized use many of the travel routes in the area in question. The commentor provides no information as to why the specific routes they wish closed were selected. The routes the commentor proposes closing consist almost entirely of routes lying within their wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	177	The BLM should close most of the White Wash area to motorized use, due to a large number of resource conflicts including scenery, cultural, biological, riparian, wildlife, and water resources. There are inadequate inventories of potential sensitive and Threatened and Endangered Species. This is a lawless area and needs closure to motorized vehicles. The likelihood of endemics is high in White Wash. Wildlife affected include amphibians, peregrines, and bighorn. Negative impacts on riparian areas include loss of function, channelization, bank destabilization and erosion, turbidity, compaction, petrochemical contaminants, and loss of flood resilience.	Much of this comment could be characterized as a "rant" against the OHV community. A representative sentence: "Gigantic unmonitored, unpermitted gatherings happen here most weekends in Spring. If they were rainbow gatherings, every law enforcement agency within 200 miles would be alert and have a presence, but, since they are ORVers only here to rip out and burn live cottonwoods, chase wildlife and foot travelers, shoot off automatic weapons, and tear through the canyons at a breakneck speed, the BLM sees no need to be here or even provide toilets or guidelines." The commentor provides no evidence to support these very broad assertions concerning the OHV community, and the BLM feels no need to respond to what is an emotional outburst of opinion.

				The BLM recognizes the affected resources in this area. Alternative B proposes closing the dunes to motorized use. Other action alternatives propose significant reductions in the areas currently open to OHV use, with measures to protect vegetative and riparian resources. Several of the routes to which the commentor refers would not be designated for motorized use in one or more action alternatives. Other routes which the commentor proposes closing lie within its wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. The BLM contracted a study with Brigham Young University in 2005 to inventory the dunes for rare and unique plants in 2005. No rare, unique, or endemic plants were found on the dunes. The commentor provides no evidence to support its list of negative impacts to the White Wash area.
Southern Utah Wilderness Alliance (SUWA)	124	178	The BLM should close “recently pioneered” motorcycle routes in the Duma Point area to protect big horn sheep habitat, sensitive soils, and provide opportunities for quiet recreation. The bighorn sheep herd is stressed.	Many of the “recently pioneered” motorcycle routes to which the commentor refers are constructed routes, primarily left over from minerals exploration. The northern portion of this area contains a very large number of these routes. This may be a reason why the commentor’s comments to BLM proposals on managing lands for wilderness characteristics raised no explicit objection to BLM’s Wilderness Characteristics Review finding that the large number of constructed impacts in this area rendered it as lacking wilderness characteristics. The stress on bighorn sheep and the damage to soils referred to by the commentor is not backed up by any documentation. Several of the motorcycle routes to which the commentor refers were not identified for motorized travel in any action alternative. The BLM interdisciplinary team reviewing

				travel routes, concluded that conflicts with bighorn sheep outweighed the purpose and need for these motorcycle routes. Those routes BLM has concluded could affect wildlife are not identified for motorized use in any action alternative. Most of the routes the commentor proposes closing are routes lying within its wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	179	The BLM should close routes above the rim in the north Behind the Rocks area. The area is popular with hikers and “this outweighs the not-very-special motorized recreation opportunities”.	The routes to which the commentor refers are popular permitted 4WD routes which have been in use for over 30 years. The comment that hiking use “outweighs” motorized use is simply stating a preference, but not a conflict. The route the commentor proposes closing lies within their wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	180	The BLM should close the dune area in north Behind the Rocks to motorized use. It is a major embarrassment to the Moab FO. SUWA uses photos of it in press releases. The route beyond the top of the Moab Rim trail should be closed.	The dune area to which the commentor refers (and their website photo taken several years earlier) has had most of the user-created routes closed and BLM can document its recovery. As with response to comment 124-179, the route the commentor proposes closing lies within their wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	181	The BLM should close several routes in south Behind the Rocks, especially the route in Hunter Canyon which contains “near here” one of the few springs in the area. This would enhance non-motorized recreation opportunities.	Several of the routes to which the commentor refers are not identified for motorized use in one or more action alternatives. The route in upper Hunter Canyon is a constructed route popular with motorized recreationists and provides access to other constructed routes on the mesa top leading back to the main Behind the Rocks and

				Kane Creek Rims routes. The commentor provides no evidence that the spring “near here” is being affected by motorized use. Several of the routes the commentor proposes closing lie within their wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	182	The BLM should close the Hunter Canyon rim route to motorized use since “this is a place where non-motorized gains clearly outweigh the motorized losses.” This is a high priority hiking area and jeep noise is a problem.	The loss versus gain to which the ocmmentor refers is clearly a matter of opinion, with no documentation provided to support their assertion. The route to which the commentor refers receives little motorized use, and the commentor provides no evidence of the noise and conflict which its identification creates. The route itself is not identified for motorized use in one action alternative (Alt B).
Southern Utah Wilderness Alliance (SUWA)	124	183	The BLM should close the single-track bicycle route along the Hunter Canyon rim due to erosion and trail-widening.	Throughout its comments, the commentor chides the BLM for not providing more non-motorized recreation opportunities, which this trail represents. The commentor provides no evidence to support its assertion of damage along this trail.
Southern Utah Wilderness Alliance (SUWA)	124	184	The BLM should close a number of routes on Hatch Point, mostly little used jeep trails and seismic lines. This is an important area for pronghorns.	The commentor’s proposal actually closes numerous routes in a very large land area, without regards to purpose or need. The only resource conflict identified is wildlife, specifically pronghorn antelope. The commentor provides no evidence that these routes are causing harm to this resource. As described in Appendix G, the BLM’s travel plan formulation involved numerous meetings of an interdisciplinary team (including wildlife). Potential resource conflicts were identified, their extent evaluated and then weighed against purpose and need for the particular route under discussion. Virtually all the routes SUWA proposes closing lie within

				their wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	185	The BLM should close most of the routes in the East Coyote area which receive little or no use in order to preserve a "remote/roadless area". The adjoining area in Colorado "has already been recognized for its wilderness values".	The commentor's characterization of the area as remote/roadless is not correct. The area has many routes from past minerals activities, all of which the commentor proposes closing. The entire area lies within SUWA's wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. The reference to the adjoining "wilderness" in Colorado is irrelevant, and has been addressed in BLM's responses to SUWA's comments on wilderness characteristics alternatives. The area to which SUWA refers has not been recognized for "wilderness values" by any public agency.
Southern Utah Wilderness Alliance (SUWA)	124	186	The BLM should close the route along the Green River to Hey Joe mine.	See response to comment 124-174.
Southern Utah Wilderness Alliance (SUWA)	124	187	The BLM should close and rehabilitate an unnamed spur of Hey Joe access route. The spur is damaging to VRM and has no purpose and need.	This route is not identified for motorized use under any action alternative. Rehabilitation is an implementation level decision and outside the scope of the current planning effort.
Southern Utah Wilderness Alliance (SUWA)	124	188	The BLM should close the route along the Green River to Hell Roaring Canyon (1224) due to a lack of purpose and need and variety of resource conflicts. Hell Roaring Canyon possesses wilderness characteristics and is pristine. This route additionally conflicts with cultural, riparian, wildlife, and primitive recreation resources.	This route had not been identified as open to motorized use under one or more action alternatives. See response to comment 124-173. A BLM interdisciplinary team reviewed each route for purpose and need weighed against resource conflicts. See Appendix G for details on the Travel Plan development process. The resource conflicts in Hell Roaring Canyon were not sufficient enough to close this route in the preferred alternative.
Southern Utah Wilderness Alliance (SUWA)	124	189	The BLM should close the route in Hell Roaring Canyon (1223) due to a lack of purpose and need and variety of resource conflicts. The route is not in alignment with BLM OHV designation regulations.	See response to comment s 124-173 and 124-188. The commentor provides no rationale why this route is "not in alignment with BLM OHV designation regulations".

Southern Utah Wilderness Alliance (SUWA)	124	190	The BLM should close an unnamed spur of Red Wash (2762) due to ORV resource damage warranting closure. ORV use has damaged the naturalness of this popular lunch spot for boaters along the Green River.	Without a map, it is not possible to know to which "route" the commentor refers. There is a motorcycle route in the vicinity, which would not be identified for motorized use across all action alternatives. Similarly, there is a named (the commentor refers to an "unnamed" route) county route heading south from this spur, which would also not be identified for motorized use across all action alternatives. The open to cross country OHV designation currently in Alt A has been changed to limited to designated routes in all action alternatives.
Southern Utah Wilderness Alliance (SUWA)	124	191	The White Wash Sand Dunes are an ecologically unique feature in the Moab planning area. These dunes should be closed to OHV use and the proposed Ecological Study area should be established. This scenic and unique area should be closed to open cross country travel area.	The BLM's Alternative B closes the dunes to OHV use and established them as an ACEC. See response to comment 124-177.
Southern Utah Wilderness Alliance (SUWA)	124	192	The BLM should close the route in Ten Mile Wash because of conflicts from motorized use with riparian and cultural resources. In addition, there are conflicts with non-motorized users. The BLM should protect these delicate resources.	The BLM should close the route in Ten Mile Wash because of conflicts from motorized use with riparian and cultural resources. In addition, there are conflicts with non-motorized users. The BLM should protect these delicate resources.
Southern Utah Wilderness Alliance (SUWA)	124	193	The BLM should close the route in Salt Valley Gorge (4006) due to a lack of purpose and need and conflict with wilderness values. The route has nearly reclaimed.	The route the commentor proposes closing lies within its wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. See also response to comment 124-188 for a discussion of the role of the interdisciplinary team in assessing resource conflicts.
Southern Utah Wilderness Alliance (SUWA)	124	194	The BLM should close Arches Salt Wash (3939) because it has no purpose and need and "paleontological resources are likely at risk."	This short (0.23 miles) route lies within SUWA's wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. The commentor provides no evidence to support their assertion of possible risk to paleontological resources.
Southern Utah Wilderness Alliance	124	195	The BLM should close the route to Day Canyon Point I (1625) due to conflicts with hikers in Day Canyon and wilderness characteristics.	This route had not been identified as open to motorized use under one or more action alternatives. The route the commentor proposes closing lies within its wilderness

(SUWA)				proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. The route in question does not create conflicts with hikers in Day Canyon, as the closest it comes to the rim is 0.25 miles. Sound from motors above does not enter Day Canyon. Utah Highway 279, a major paved road, intersects the canyon mouth and is much more likely to add to the asserted and undocumented conflict with Day Canyon hikers.
Southern Utah Wilderness Alliance (SUWA)	124	196	The entire Green River should be found suitable for inclusion in the Wild and Scenic River System. Green River State Park to Crystal Geyser should be recreational. Crystal Geyser to Ruby Rach should be wild. Ruby Ranch to Mineral Canyon should be wild. Mineral Canyon to Canyonlands National Park should be scenic. Tenmile Canyon should be found eligible and suitable as wild.	For the Green River, see response to comments 124-91 and 124-92. For Tenmile Canyon, see response to comment 124-94.
Southern Utah Wilderness Alliance (SUWA)	124	197	The BLM should close motorized routes running along the river in Labyrinth Canyon, including the routes running up and down canyon from Spring Canyon. This would correct the noise problems that “plague” river runners and hikers in the canyon.	See response to comments 124-174 and 124-186. This route was identified as a road in the 1999-2003 wilderness inventory. It leads to a large disturbed mining area. It is a route popular with motorized recreationists, including those under BLM permit. The commentor provides no evidence to support its assertion of the noise that plagues hikers and boaters. The BLM made several visits to this route during a recent Easter Jeep Safari; at the time of these visits, the BLM observed very little motorized or river use, let alone user conflict. The route the commentor proposes closing lies within its wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness	124	198	The BLM should close the route alongside the river north of Mineral Canyon, since the route causes user	See response to comment 124-172. The commentor provides no evidence to support its assertion of user

Alliance (SUWA)			conflicts along the river and resource damage in Hell-Roaring Canyon.	conflict and/or resource damage. The route in Hell Roaring Canyon is identified for motorized use only to the state section in one or more action alternatives. The route the commentor proposes closing lies within its wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	199	The BLM should close the motorized route in Ten Mile Canyon due to damage to cultural and riparian resources. Ten Mile is a perennial stream and would be eligible for inclusion as a Wild and Scenic River.	See response to comments 124-94, 124-175, and 124-192. This route, which is very popular with motorized recreationists, is not identified for motorized use in one action alternative. The current travel route has been heavily signed to minimize damage to riparian resources. Routes accessing cultural resources have been closed to motorized travel. The route the commentor proposes closing lies within its wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	200	The BLM should close the proposed motorized route in Hell Roaring Canyon to protect scenic values, riparian values, and fragile soils.	See response to comments 124-173, 124-188, and 124-189. The BLM identifies this route for motorized use only up to the state section in one or more action alternatives. This route provides access to a state section and a wildlife guzzler in the area. The commentor provides no evidence to support its assertions of resource damage. As described in Appendix G, the BLM's travel plan formulation involved numerous meetings of an interdisciplinary team (including the resource specialists for riparian, soils, and scenery). Potential resource conflicts were identified, their extent evaluated and weighed against purpose and need for the particular route under discussion. The route the commentor proposes closing lies within its

				wilderness proposal. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals.
Southern Utah Wilderness Alliance (SUWA)	124	201	The BLM should close routes with no clear purpose and need, that have "a resource or use conflict", or overlap areas that "have been found to possess wilderness characteristics". The specific areas of concern include Horsethief Point, Mineral Point, Deadman Point, Spring Canyon Point, Tenmile Point and the area north of Ruby Ranch extending to Crystal Geyser.	See response to comment 124-62, 124-63, 124-64, 124-65, and 124-143. The commentor's proposal in this comment covers a very large land area covering tens of thousands of acres, and with hundreds of miles of inventoried routes. SUWA provides no specific route data to support their broad assertions of resource and user conflicts. The principal "resource conflict" appears to be the fact that virtually all of these routes are within SUWA's wilderness proposals. As described in Chapter 2, pgs. 108-109, the BLM is not obligated to create roadless areas in response to wilderness proposals. The commentor asserts that the BLM should close routes that have a "resource or user conflict". The presence of such a conflict does not in itself warrant not identifying a route for motorized use. Rather, the BLM identifies potential resource conflicts, assesses the significance of such conflicts, and weighs any such conflicts against purpose and need. As described in Appendix G, the BLM's travel plan formulation involved numerous meetings of an interdisciplinary team. Potential resource conflicts were identified, their extent evaluated and then weighed against purpose and need for the particular route under discussion.
Southern Utah Wilderness Alliance (SUWA)	124	202	The BLM should adopt a management plan that protects areas with wilderness characteristics. Wilderness characteristics should be one of the resources specifically protected in the expanded Labyrinth ACEC.	The relevant important values considered in the Area of Critical Environmental Concern process to not include wilderness characteristics. The "expanded ACEC" to which the commentor refers has not been found by BLM to possess any relevant and important values to qualify it as an ACEC. See response to comment 124-86.
Southern Utah Wilderness	124	203	The BLM should manage lands included in substantive citizens' wilderness proposals in such a way that no	See response to comments 124-52, 124-53, and 124-54 on BLM's requirements to manage lands for wilderness

Alliance (SUWA)			activities are permitted that permanently degrade the resource.	characteristics. As described in detail in Chapter 4, as part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process (whose findings are available on the MFO planning website, and in the administrative record). The BLM stands by its findings of its wilderness characteristics inventory maintenance. The BLM assumes that the commentor's comment refers to the Labyrinth Canyon area, the focus of the commentor's Exhibit C. Much of this area was found to lack wilderness characteristics in BLM's wilderness characteristics inventory maintenance process. The area found to possess wilderness characteristics would be managed for such under Alternative B.
Southern Utah Wilderness Alliance (SUWA)	124	204	The BLM should designate Labyrinth Canyon as a primitive, undeveloped SRMA. Continue the interagency river management system and reduce route density.	In Alt C of the DRMP/EIS, Labyrinth Canyon is part of the Labyrinth Rims/Gemini Bridges Special Recreation Management Area (SRMA) which is a destination SRMA. However, the portion of the Green River from Placer Bottom to Mineral Bottom is managed as non-mechanized Focus Area (7,709 acres). The interagency river management system is an issue addressed through policy or adminstrative action and therefore does not require a land use planning decision (see pg. 1-11 of the DRMP/EIS. For discussion of route density see response to comment 124-62 through 124-66.
Southern Utah Wilderness Alliance (SUWA)	124	205	Recreation generates more money than oil and gas. Therefore, all lands within Labyrinth Canyon should closed or no surface occupancy for oil and gas. The Green River corridor found by the BLM to possess wilderness characteristics should be closed to oil and	In Chapter 4 of the DRMP/EIS, the BLM acknowledges the economic values of recreation in the Moab planning area. In Alt C, the BLM institutes no surface occupancy along the entire Green River corridor, including Labyrinth Canyon.

			gas. Lands contained in the Red Rock Wilderness Act should be no surface occupancy.	The BLM has no obligation to close to oil and gas to all lands that are within a bill introduced in Congres, the Red Rock Wilderness Act. Should congress direct the BLM to close all lands to oil and gas leasing, the BLM will comply with the law.
Southern Utah Wilderness Alliance (SUWA)	124	206	The BLM must give priority to the designation of Labyrinth ACEC to protect natural resources (riparian, cultural, historical, wilderness characteristics, wildlife and sensitive soils). The relevant and important values are the same as listed in Comment 86.	See response to comment 124-86.
Southern Utah Wilderness Alliance (SUWA)	124	207	For Arches Adjacent Unit 1, the BLM has performed a cursory and erroneous review concerning wilderness characteristics, failing to take into account new information presented to BLM on June 30, 2007.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process . These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	208	For Arches Adjacent Unit 2, the BLM arbitrarily excludes an area from wilderness characteristics by using an inaccurate boundary.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	209	For Arches Adjacent Unit 3, BLM arbitrarily excludes an area from wilderness characteristics that appears natural, providing no reason for doing so.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial

				photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	210	For Arches Adjacent Unit 4, the BLM excludes an area from wilderness characteristics that appears natural.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO website and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	211	The BLM erroneously excludes land with WC in Arches Adjacent Unit 5, relying on aerial photography and county route data. BLM fails to include an area possessing wilderness characteristics.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	212	The BLM erroneously relies on County GIS data to make an incomplete wilderness characteristics evaluation in Arches Adjacent Unit 6. Specifically, the BLM uses "purported" county routes as boundaries of naturalness.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM

				stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	213	The BLM uses an arbitrary boundary down a cliff line, rather than go to the edge of naturalness in Dome Plateau. This excludes an area with wilderness characteristics.	The area in question totals 304 acres of steep talus slopes. Under Alternative C, this area is no surface occupancy for oil and gas leasing. This area was withdrawn from new mining claims under the Three Rivers Withdrawal. There are no travel routes proposed in this area under any alternative. Thus, the salient features of wilderness characteristics are being protected by other proposed management actions.
Southern Utah Wilderness Alliance (SUWA)	124	214	The BLM excludes the Dry Mesa area from its findings of naturalness, although the area is natural, consisting mainly of “rehabilitating” seismic lines. This excludes an area with wilderness characteristics from the Dome Plateau.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM’s findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	215	The BLM fails to go to the edge of naturalness along the western boundary with Arches NP. These lands are endorsed for wilderness by the National Park Service. This excludes an area with wilderness characteristics from the Dome Plateau.	See response to comment 124-213, which refers to this area.
Southern Utah Wilderness Alliance (SUWA)	124	216	The BLM did not reconsider a portion of Beaver Creek in its 2007 wilderness characteristics review. The BLM fails to go to the edge of naturalness along Beaver Creek WIA’s northern boundary with Granite Creek WIA. This excludes an area with wilderness characteristics. The BLM did not inventory this area on the ground.	The area in question was determined to lack wilderness characteristics in the 1999 inventory. The 2003 revision accounted for public comments regarding the 1999 findings. The BLM stands by its findings of its wilderness characteristics inventory maintenance. While the BLM did not perform additional on the ground inventory in 2007, ground truthing of the area was done for the 1999 inventory and its 2003 revision. Aerial photography review confirmed the findings of earlier field trips.
Southern Utah Wilderness	124	217	The BLM fails to go to the edge of naturalness in the Steamboat Mesa area, excluding lands with wilderness	As depicted by the commentor on the map submitted with this comment, most of the land in question was found to

Alliance (SUWA)			characteristics in the Beaver Creek Unit.	lack wilderness characteristics in the 1990-2003 wilderness inventory. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	218	SUWA disagrees with BLM's wilderness characteristics review determination on the lands below Steamboat Mesa. This excludes lands with wilderness characteristics in the Beaver Creek Unit.	This comment refers to the BLM's findings from the 1999-2003 wilderness reinventory. As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	219	The BLM failed to consider adjacent wilderness character lands in Colorado when evaluating Beaver Creek Unit 4, and erred in its 1999-2003 findings on lands to the west. This excludes lands with wilderness characteristics from the Beaver Creek Unit.	The Colorado lands that the commentor refers have not been found to possess wilderness characteristics by any federal or state agency, but only by the Colorado Environmental Coalition. It is beyond the scope of the Moab DRMP/EIS to evaluate wilderness characteristics beyond the field office boundary.
Southern Utah Wilderness Alliance (SUWA)	124	220	The BLM fails to include lands with wilderness characteristics identified in the accompanying SUWA map as Area C of the Beaver Creek Unit.	The area in question was determined to lack wilderness characteristics in the 1999 inventory. The 2003 revision accounted for public comments regarding the 1999 findings. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	221	The BLM fails to include lands with wilderness characteristics identified in the accompanying SUWA map as Area D of the Beaver Creek Unit.	The area in question was determined to lack wilderness characteristics in the 1999 inventory. The 2003 revision accounted for public comments regarding the 1999 findings. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	222	The BLM erred in its 2007 determination of non-wilderness characteristics for Beaver Creek, Unit 2. The BLM needs to expand the Beaver Creek Unit to include these natural lands as shown on the accompanying map.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well

				as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	223	The BLM uses a faint and reclaiming route as the boundary of naturalness for Beaver Creek, Unit 1. The BLM justifies the exclusion of the area to the west by noting that the route is “substantially noticeable.” This excludes lands from wilderness characteristics.	This route was described as a road in the 1999-2003 inventory. It is shown as a 4WD route on the Blue Chief Mesa 24K topo. It is clearly visible on aerial photos. The commentor provides no documentation to support its assertion on the condition of this route. Furthermore, the commentor does not dispute the existence of this route, and suggests that the BLM could “cherry-stem” this route. The route is clearly not “natural”, and thus is an appropriate boundary of naturalness. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	224	The BLM erred in its conclusions in its 1999-2003 wilderness inventory for the area in Behind the Rocks south and west of the WSA. The BLM’s inventory files and the on the ground conditions confirm that natural characteristics remain. The BLM needs to extend the boundary of the unit to the south slightly and include this area, utilizing the used vehicle routes as the unit’s boundary. Any other configuration in this area fails to identify natural and wilderness character lands. The BLM’s WCR did not address this particular area.	As depicted by the commentor on the map submitted with this comment, the land in question was found to lack wilderness characteristics in the 1999-2003 wilderness inventory. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by the conclusions of the 1999-2003 inventory.
Southern Utah Wilderness Alliance (SUWA)	124	225	The BLM arbitrarily excluded the northern portion of Big Triangle by using an inappropriate boundary of naturalness, relying on county GIS data as “default boundaries”. This excludes lands from wilderness characteristics. No on the ground inventory was performed.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM’s findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.

Southern Utah Wilderness Alliance (SUWA)	124	226	The BLM erroneously excluded a small parcel (~32 acres as shown on accompanying map) of lands adjoining Coal Canyon WSA. The current wilderness characteristics boundary does not follow an impact. This excludes lands from wilderness characteristics.	As depicted by the commentor on the map submitted with this comment, the land in question was found to lack wilderness characteristics in the 1999-2003 wilderness inventory. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	227	The BLM erroneously excludes a small parcel of land in the Coal Canyon area (~142 acres as shown on accompanying map) by not going to the boundary of naturalness. There was no on the ground inventory of this area. This excludes lands from wilderness characteristics.	As described in the 2003 revision document, BLM field checks subsequent to the 1999 inventory added several hundred acres to the Coal Canyon Wilderness Inventory Area (WIA). Extensive fieldwork led the BLM to conclude that the resulting WIA boundary, drawn “point-to-point” in this area, was an appropriate boundary of naturalness designed to exclude impacts from oil and gas exploration and development. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	228	The BLM erroneously excludes lands from wilderness characteristics units in the Coal Canyon area by not going to the boundary of naturalness, but instead uses a “point-to-point” feature. There was no on the ground inventory of this area.	As explained in the Diamond Canyon wilderness characteristics review for Unit 5, the area in question is characterized by a large number of impacts from past minerals exploration and development. These are clearly identifiable from high-resolution aerial photos. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	229	The BLM erroneously excludes lands from a wilderness character (sic) unit in the Coal Canyon area by not going to the boundary of naturalness, but instead uses arbitrary legal lines.	The area in question is separated from the larger wilderness characteristics area by a combination of lands found to lack wilderness characteristics in the 1999-2003 inventory, and by verified constructed vehicle routes. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	230	The BLM uses arbitrary boundaries to separate out lands in Diamond Canyon Unit 8 from lands found to have wilderness characteristics. The BLM should exclude a few of the significant impacts in the area by using cherry-stems to include the complete areas with wilderness characteristics. The BLM fails to include the full extent of wilderness characteristics lands in this area.	The concept of “cherry-stems” is irrelevant to the DRMP/EIS, since this is a term applicable to the creation and mapping of new Wilderness Study Areas. The creation of new Wilderness Study Areas is beyond the scope of the land use planning process. To remove the impacts from wilderness characteristics in this area would require several long cherry-stems, resulting in a convoluted management landscape. Rather than do a tree-by-tree boundary exercise, the BLM looked at the

				area as a whole, concluding that the impacts present were sufficient to disqualify the area in question from wilderness characteristics. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	231	The BLM arbitrarily excludes an area possessing wilderness characteristics in the Coal Canyon area. There are no significant impacts within this area that warrants the BLM's arbitrary section line boundaries. By using section lines as boundaries of impacts, areas with wilderness characteristics were excluded.	The area in question is not free of impacts. County GIS data, as well as aerial photography review indicates several obvious vehicle routes. The upper half of this area is almost completely encircled by visible routes. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	232	The BLM should extend the boundary of wilderness characteristics in the Coal Canyon area to the major road to the south as the area to the north possesses wilderness characteristics.	This very small area is bisected by routes clearly visible from aerial photos. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	233	The BLM arbitrarily excludes an area in Coal Canyon possessing wilderness characteristics by using legal lines as boundaries.	This appears to be a mapping error and has been corrected. About 338 acres has been added to the non-WSA lands with wilderness characteristics in Alt B.
Southern Utah Wilderness Alliance (SUWA)	124	234	The BLM arbitrarily excludes an area in Coal Canyon possessing wilderness and fails to provide justification.	This appears to be a mapping error and has been corrected. About 165 acres has been added to the non-WSA lands with wilderness characteristics in Alt B.
Southern Utah Wilderness Alliance (SUWA)	124	235	The BLM uses a section line boundary in the Coal Canyon Area to separate out an area with natural character from the larger wilderness character unit.	As clearly indicated by GIS data and aerial photography verification, the area in question is completely encircled by routes, and is of insufficient size to possess wilderness characteristics as a stand-alone unit. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	236	The BLM does not identify any of this remote and wild area (Coyote Wash) as having retained or possessing wilderness character. The BLM should identify the "core" of Coyote Wash as possessing opportunities for solitude and primitive recreation. Additionally, this acreage abuts wilderness quality lands in Colorado which the BLM did not consider.	It is worth noting that the map provided by the commentor in its comment on the DRMP/EIS shows "wilderness quality" lands in the core of Coyote Wash at only about 40 per cent of SUWA's original proposal, despite the commentor's assertion that they did "detailed evaluation and inventory on the ground". The "core" the commentor refers to is too small (under 5,000 acres) to possess wilderness characteristics as a stand-alone unit. Whether or not any part of the unit abuts "wilderness quality" lands

				in Colorado is irrelevant, since the adjoining lands have never been determined to possess wilderness characteristics by any state or federal agency. Additionally, a constructed route runs the entire length of the unit on the Utah side of the state line. The BLM stands by the findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	237	The BLM uses an arbitrary route in the Dead Horse Cliffs area as the boundary of naturalness. The wilderness characteristics do not end at the Canyonlands National Park boundary, but instead extend onto Park Service lands.	The area in question was determined to lack wilderness characteristics in the 1999 Wilderness Inventory and its 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	238	The BLM arbitrarily excludes lands between the Dead Horse Point basin overlooks which for many visitors are some of the most natural landscape views anywhere. The BLM arbitrarily excludes these lands that proceed up a natural cliff face that retain natural characteristics.	As described in the Dead Horse Cliffs wilderness characteristics review document, these lands are too small to be managed for wilderness characteristics as a stand-alone unit. This comment seems to be directed against the BLM's finding of non wilderness chararacter for the lands to the south in its 1999-2003 wilderness inventory. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	239	The BLM arbitrarily excludes lands in the Dome Plateau area with outstanding natural character north of the BLM's wilderness character boundary.	In a signed Reasonable Probability Determination, and based on an extensive on-the-ground inventory, the BLM concluded that the lands in question lacked wilderness character. The BLM stands by its conclusion.
Southern Utah Wilderness Alliance (SUWA)	124	240	SUWA has provided BLM with supplemental wilderness character information both within the Dome Plateau submission (January 2002) and recently within the Arches Adjacent submission (June 2007).	See responses to comments 124- 213, 124-214 and 124-215.
Southern Utah Wilderness Alliance (SUWA)	124	241	In the Fisher Towers Wilderness Character Unit, wilderness character exists beyond BLM's arbitrary line. The boundary used to separate lands retaining wilderness character from lands that lack wilderness character does not follow a human impact at all, but rather utilizes straight and arbitrary lines crossing the natural landscape. This arbitrary placement excludes wilderness characteristics in the area.	The area to which the commentor refers has not been presented to the BLM as an area possessing wilderness characteristics until the date that this comment was received (11-30-2007). It was not part of the lands proposed for wilderness in HR 1500 and assessed in the 1999-2003 reinventory. It was not part of the new proposals analyzed in the 2007 wilderness characteristics review. It is not included in the map of lands in the Red

				Rock Wilderness Act which is on SUWA's website. The commentor provides no information other than a low-resolution aerial photo to support its assertion that previous inventories were in error. The BLM stands by the findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	242	SUWA questions the findings of the 1999-2003 wilderness inventory in the Beaver Creek/Granite Creek area. The BLM identifies the route at the bottom of Granite Creek as a significant feature; it does not diminish the natural characteristics of the landscape adjacent to and north of this route along the canyon wall. This natural and impressive area is not impacted or effected by human impacts and retains its natural character.	See response to comment 124-216.
Southern Utah Wilderness Alliance (SUWA)	124	243	The BLM has not identified the full extent of wilderness character (WC) north of the current WC Hatch/Harts/Lockhart Basin boundary. The BLM's current boundary uses an old seismic line.	The area in question was determined to lack WC in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	244	The Moab Field Office has failed to identify lands with wilderness character (WC) in the Lockhart Basin area adjoining similar lands in the Monticello Field Office, who also did not find wilderness characteristics in this area. The Dripping Spring valley retains an overwhelming natural appearance and is free of human impacts; those that do remain are minimal in context. The BLM only manages the high benches over the valley and Moab BLM will have to coordinate with Monticello BLM.	The area in question (both within the Moab and Monticello Field Offices) was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions. The Dripping Spring valley is not within the boundaries of the Moab Field Office. This valley is administered by the Monticello BLM.
Southern Utah Wilderness Alliance (SUWA)	124	245	The BLM did an inadequate wilderness characteristics determination on much of the bench lands above Lockhart Basin.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning

				website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	246	The BLM Monticello Field Office did not include the full extent of wilderness characteristics in the Lockhart Basin area, which affects adjoining lands in the Moab Field Office.	This comment is directed towards the Monticello DRMP/EIS.
Southern Utah Wilderness Alliance (SUWA)	124	247	SUWA disputes the findings of non wilderness characteristics from the 1999-2003 reinventory for Harts Draw area. The BLM utilizes the natural cliff band and a section line to eliminate wilderness values. The wilderness quality and values of the landscape do not end at these arbitrary features.	The area in question was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	248	The BLM uses arbitrary legal boundaries in the Horsethief Point area to exclude areas of wilderness characteristics. That boundary crosses the natural terrain and does not separate lands accurate. This may be due to BLM not performing on the ground evaluation	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	249	The BLM uses arbitrary legal boundaries to exclude areas of wilderness characteristics in the Horsethief Point area. SUWA's inventories show that the area remains generally natural in appearance and possesses natural character. The utilization of a section line inappropriately separates the lands that are natural in appearance	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness	124	250	A small area of Horsethief Point adjoins the Park (Canyonlands National Park), with no physical impact or	This appears to be a mapping error and has been corrected. About 24 acres has been added to the non-

Alliance (SUWA)			separation and has wilderness character.	WSA lands with wilderness characteristics in Alt B.
Southern Utah Wilderness Alliance (SUWA)	124	251	A small area adjoining the Park (Canyonlands National Park) and endorsed by the Park Service for wilderness has wilderness characteristics and has been excluded. There is no physical impact separating this area from the park.	The area to which the commentor refers has not been presented to the BLM as an area possessing wilderness characteristics until the date this comment was received (11-30-2007). It was not part of the lands proposed for wilderness in HR 1500 and assessed in the 1999-2003 reinventory. It was not part of the new proposals analyzed in the 2007 wilderness characteristics review. It is net included in the Red Rock Wilderness Act map accessed from SUWA's website. The commentor provides no information other than a low-resolution aerial photo to support its assertion that previous inventories were in error. The BLM stands by the findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	252	The current Hunter Canyon wilderness characteristics boundary excludes areas with wilderness characteristics on the cliffs above Kane Creek.	A portion of this area was reevaluated in the 1999-2003 reinventory and found to lack wilderness characteristics. Most of the area to which the commentor refers has not been presented to the BLM as an area possessing wilderness characteristics until the date this comment was received (11-30-2007). The area was not part of the lands proposed for wilderness in HR 1500 and assessed in the 1999-2003 reinventory. It was not part of the new proposals analyzed in the 2007 wildereness characteristics review. It is not included in the Red Rock Wilderness Act map accessed from SUWA's website. The commentor provides no information other than a low-resolution aerial photo to support its assertion that previous inventories were in error. The BLM stands by the findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	253	The Labyrinth Canyon area has taken the biggest hit of eliminating wilderness character by BLM's needed lack of off road vehicle management. The area south of Spring Canyon is one which retains a significant natural appearance "yet remains to be fully identified by the BLM".	The area in question was determined to lack wilderness character in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.

Southern Utah Wilderness Alliance (SUWA)	124	254	The BLM overly states the impacts to naturalness on the south rim of Hell Roaring Canyon (in Labyrinth Canyon). By far, there is more landscape here that does not have a human impact than does.	The area in question was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	255	The BLM overly states the impacts to naturalness on the north rim of Hell Roaring Canyon (Labyrinth Canyon). The BLM must end the arbitrary utilization of the natural rim and include the full range of lands to the south that continue to have natural values in its inventory of wilderness characteristics.	The area in question was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	256	The BLM arbitrarily excludes from wilderness characteristics a small area on the southwest corner of the Hell Roaring Canyon Rim (Labyrinth Canyon).	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	257	Whatever wilderness characteristics are no longer present in the Labyrinth Canyon area is due to BLM's failure to restrict OHV activity. The BLM arbitrarily excludes some lands that retain their natural character from the Labyrinth Unit.	The BLM agrees with the commentor's characterization of the area as lacking wilderness characteristics. The remainder of the area in question was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	258	An area of the Mary Jane Canyon unit which adjoins roadless areas in the National Forest has been omitted from BLM's inventory of wilderness characteristics. This area is natural in appearance, and possesses wilderness character in association with National Forest Service lands.	The area to which the commentor refers has not been presented to the BLM as an area possessing wilderness characteristics until the date this comment was received (11-30-2007). It was not part of the lands proposed for wilderness in HR 1500 and assessed in the 1999-2003 reinventory. It was not part of the new proposals analyzed in the 2007 wilderness characteristics review. It is not included in the Red Rock Wilderness Act map

				accessed from SUWA's website. The commentor provides no information other than a low-resolution aerial photo to support its assertion that previous inventories were in error. The BLM stands by the findings of its wilderness characteristics inventory maintenance. The National Forest Service area in question has not been determined by that agency to possess wilderness characteristics (itself a BLM term), and its adjacency is irrelevant.
Southern Utah Wilderness Alliance (SUWA)	124	259	The BLM should include the small acreage south of the creek in the Mary Jane Canyon unit as having wilderness characteristics. SUWA's on the ground evaluations found that the area on the south side of the river outside of the camping area and north of the powerline remain overwhelmingly natural.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	260	Lands in the Mary Jane unit are excluded from wilderness characteristics due to multiple vehicle routes and ORV disturbance. SUWA agrees with the BLM that this area has seen ORV use, but the lands continue to have natural characteristics north of this ORV use area.	The area in question was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	261	The BLM arbitrarily excluded natural lands by using a section line as a boundary. As a result of the arbitrary boundary, wilderness values end along the natural terrain, opposed to using the edge of a natural disturbance that exists to the west. The BLM fails to use the edge of significant impact as a boundary of wilderness characteristics in the Mexico Point unit.	As clearly depicted on the wilderness characteristics review map for Mexico Point (available on the BLM planning website and in the administrative record), almost all of the lands in question lie on BLM lands administered by the Vernal Field Office.
Southern Utah Wilderness Alliance (SUWA)	124	262	Areas adjacent to the Wilderness Study Area retain their wilderness character and should be included within the larger Mill Creek Canyon unit.	The area in question was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.

Southern Utah Wilderness Alliance (SUWA)	124	263	SUWA disagrees with the BLM on its finding of non wilderness characteristics for the lands south of the Mill Creek Canyon wilderness characteristics area. The BLM's wilderness character boundary continues to utilize natural features and a section line to identify the full extent of wilderness resources. These arbitrary boundaries do not reflect the separation of lands with and without wilderness character.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	264	Lands on the rims adjacent to Negro Bill Canyon Wilderness Study Area retain their natural character, and should be added to the larger Negro Bill Canyon unit.	A portion of the area in question was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by BLM took place shortly before beginning the current plan revision, and BLM stands by its conclusions. The remainder of the area to which the commentor refers has not been presented to BLM as an area possessing wilderness characteristics until the date this comment was received (11-30-2007). It was not part of the lands proposed for wilderness in HR 1500 and assessed in the 1999-2003 reinventory. It was not part of the new proposals analyzed in the 2007 wilderness characteristics review. It is not included in the Red Rock Wilderness Act map accessed from SUWA's website. The commentor provides no information other than a low-resolution aerial photo to support its assertion that previous inventories were in error. The BLM stands by the findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	265	The BLM's evaluation of the Mat Martin Point area (Porcupine Rim) is that the few routes on top are so impacted that they deter from the naturalness of the entire landscape. This area appears free of significant impacts and retains its wilderness values and characteristics. The BLM should add this area to lands with wilderness characteristics.	The area in question was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah	124	266	SUWA has submitted significant new information on the	As noted on the Moab BLM planning website, the BLM

Wilderness Alliance (SUWA)			Renegade Point area, demonstrating that it has wilderness characteristics. Without justification, the BLM divided the Renegade Point unit, stating that routes are substantially noticeable.	reviewed this new information (received in June, 2007), and found no reason to change its wilderness characteristics review conclusions. As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	267	The BLM found unit 4 of Renegade Point wilderness character unit natural. Had the BLM reviewed the Renegade Point unit in conjunction with lands with wilderness characteristics in Colorado, the WCR finding would have had a different outcome.	The Colorado lands to which the commentor refers have not been found to possess wilderness characteristics by any federal or state agency, but only by the Colorado Environmental Coalition. It is beyond the scope of the Moab DRMP/EIS to evaluate wilderness characteristics beyond the field office boundary.
Southern Utah Wilderness Alliance (SUWA)	124	268	The BLM states that areas in Unit 5 of Renegade Point have been chained and the area is unnatural. SUWA asserts that by viewing these areas on the ground, the area appears "generally natural".	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The review included reviewing GIS data on vegetative treatments, including chaining. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process . These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	269	The routes used by the BLM to separate out wilderness character Units 2 and 3 of Renegade Point are not significant impacts.	The commentor does not dispute the existence of these routes. As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. BLM's findings are described in the 1999-

				2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	270	A small omission of wilderness characteristics in Westwater Canyon is located adjacent to the private land holding.	This very small area (approximately 10 acres) has not been presented to BLM as an area possessing wilderness characteristics until the date this comment was received (11-30-2007). It was not part of the lands proposed for wilderness in HR 1500 and assessed in the 1999-2003 reinventory. It was not part of the new proposals analyzed in the 2007 wilderness characteristics review. It is not included in the Red Rock Wilderness Act map (or is too small to see) accessed from SUWA's website. The commentor provides no information other than a low-resolution aerial photo to support its assertion that previous inventories were in error. The BLM stands by the findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	271	SUWA disputes the BLM's finding that vegetative manipulation has rendered a small area on the east side of the Westwater Wilderness Study Area unnatural.	The area in question was determined to lack wilderness characteristics in the 1999 inventory and 2003 revision. These efforts by the BLM took place shortly before beginning the current plan revision, and the BLM stands by its conclusions.
Southern Utah Wilderness Alliance (SUWA)	124	272	The BLM excludes lands north of the motorcycle trail in the Westwater wilderness characteristics area, which is not a significant impact.	The commentor does not dispute the existence of this route. This route marks the boundary of naturalness. As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics

				inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	273	The BLM uses an arbitrary boundary to exclude lands with wilderness characteristics in the Yellow Bird area.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Southern Utah Wilderness Alliance (SUWA)	124	274	The BLM characterizes this area by stating that it has a large number of substantially noticeable routes. If BLM had performed an on the ground inventory, it would have noted that the boundary does not accurately separate lands with and without wilderness characteristics. The BLM uses an arbitrary boundary to exclude lands with wilderness characteristics in the Yellow Bird area.	As part of its wilderness characteristics inventory maintenance, the BLM used a combination of field checks, ID team review, BLM and county GIS data, range files, and review of high resolution 2006 aerial photographs. The BLM's findings are described in the 1999-2003 wilderness reinventory documentation as well as the 2007 wilderness characteristics review process. These findings are available on the MFO planning website, and in the administrative record. The BLM stands by its findings of its wilderness characteristics inventory maintenance.
Moab Trails Alliance	196	1	It is blatantly obvious that the old way of sharing jeep routes with everyone, the basis of mountain biking in Moab, no longer works. Gemini Bridges, Poison Spider Mesa, and Gold Bar Rim are classic examples. With new 4-wheeled drive technology the alterations (damage) to the trails are such that cyclists cannot use the same route unless they like taking their bike for a walk. The Grand County Non-Motorized Trails Master Plan proposes alternate routes in each of these areas. The Green Dot (Gemini area), Blue Dot (Gold Bar Singletrack listed in "D"), and Wags Way (Poison Spider area) Trails should be priority projects ASAP. These are user created routes that traverse slickrock in areas that have been overrun by motorized traffic.	The routes considered in the alternatives for the Travel Plan accompanying the DRMP/EIS were those submitted by the public during the scoping period, including those submitted by Trail Mix and Moab Trails Alliance, and verified on the ground by BLM staff (see pgs. G-15 through G-21). On pg. 2-48 of the DRMP/EIS there is a provision for adding new routes. The provision states "identification of specific designated routes would be initially established through the chosen travel plan accompanying the RMP and may be modified through subsequent implementation planning and project planning on a case by case basis". New routes proposed by the commentor will be considered after completion of the Record of Decision for the Moab RMP unless those

			After a few years of trying to develop new trails in the Moab Field Office it is apparent that our niche here is slickrock. The predominantly sandy soils make for maintenance nightmares and undesirable routes. MTA recommends that more slickrock routes be developed and marked. A route from the Monitor-Merrimack area over to SR313 is an example. Slickrock riding made Moab famous, it is low impact, and it is what will keep people coming back. The Bartlett Wash Freeride area in "C" is a great idea.	routes are in a closed area. However, at the completion of the RMP, all travel will be restricted to the routes designated in the plan.
Moab Trails Alliance	196	2	The amount of new trail (“C”= 150 miles, “B”= 75, etc) should be specifically stated as, "In addition to trails developed on existing roads as mapped on the Grand County Transportation Inventory map". The allotted new mileage will include only those routes mapped across previously undisturbed terrain.	Wording has been added to the DRMP/EIS on pg. 2-49 to clarify that the mileage is for new trails; converted existing routes are in addition to the specific mileage listed for each alternative.
Moab Trails Alliance	196	3	It is a sore spot with cyclists to be grouped with OHVs. The definition of OHV in the glossary on page X-37 precludes bicycles from this category. The explanation hidden at the bottom of page G-5 groups motorized and mechanized together. Please remove bicycling from any definitions of OHVs and other all-encompassing variations of "wheeled vehicle" classifications. While a bicycle has wheels, this is the extent of any similarity with motorized forms of transportation. Placing mountain biking within the non-motorized category is consistent with the BLM National Mountain Bicycling Strategic Action Plan and many other BLM management plans across the country.	The BLM recognizes that the BLM National Mountain Bicycling Strategic Action Plan does not group bicycles with OHVs. The statement on pg. G-5 is intended to clarify that bicycles are allowed on routes designated for OHVs. Travel management covers mechanized as well as motorized use.
Moab Trails Alliance	196	4	In fact, the BLM Wilderness Study Area Interim Management Policy H-5880-1 (Wilderness IMP) does not categorically ban mountain biking from WSAs. MTA requests that the Moab RMP adopt a management policy that would permit bicycling on some trails in non-WSA (ACEC) areas. While bicycling may not be appropriate on some trails in these areas, others can provide a welcome relief from front-country and	Bicycles are allowed only on inventoried routes within Wilderness Study Areas. The DRMP/EIS identifies some of these inventoried routes for vehicular use across various alternatives. Bicycles would be allowed on those inventoried routes that are identified for vehicular travel. The commentor mentions no specific trails in non-WSA areas that bicycles should be allowed on. The plan

			motorized areas. A decision to ban this use should be based on scientific reasoning.	manages specific hiking trails for hiking use only on pg. 2-49 of the DRMP/EIS.. Bicycles would not be allowed on these trails.
Moab Trails Alliance	196	5	Typos: p. 4-464 second paragraph line 4 “carefully” should be careful.	The grammatical correction has been made in the PRMP/FEIS.
Moab Trails Alliance	196	6	Typos: p. I-8 Under Relevance Criteria, seventh line, “…threatened plants do not occur…” Shouldn’t “do not” be deleted or else the whole sentence be deleted?	The sentence has been deleted.
Outward Bound Wilderness	197	1	Protect Labyrinth as a wild and scenic river (which it is!), do not let oil companies intrude their presence on its shores.	The PRMP/EIS proposes that Labyrinth Canyon be managed as suitable as a Wild and Scenic River from Ruby Ranch to the National Park Service boundary. In Alt C, the entire Green River corridor is managed as no surface occupancy for oil and gas leasing and other surface disturbing activities. This management action is intended to protect the values of the entire Green River corridor.
Canyonlands Field Institute	199	1	Dolores River Canyons SRMA - Support Alternative C with exceptions: In the boating management section, we request a CHANGE in party number to match the other sections of river managed by BLM in SE Utah i.e. change the party size to be 25 PLUS guides. In order to serve school groups, the 25 maximum passengers is necessary in most cases. In addition, make this number consistent with other stretches will make it easier on the public and our office staff in comparing trip options.	The BLM agrees with the commentor that it is important to have consistent river rules. The BLM also agrees that school groups have special needs because the guide-passenger ratio must often be increased. The text has been changed to read "25 people, excluding guides."
Canyonlands Field Institute	199	2	Special Designations - Wild and Scenic Rivers - All sections as outlined, support Alternative B. NOTE: 1) We believe the river segments should maintain the classifications they received in the eligibilty study. 2) We request that the Green River from Swasey's Beach to San Rafael River be included as "scenic" stretch. The Price BLM released draft RMP in 2004 that presented a preferred alternative in which the entire river from Swasey's to River Mile 97 to be "suitable". We support the Moab plan being consistent with the Price plan. 3) We are especially concerned that the upper Professor Creek (headwaters to diversion) is not found "suitable"	See response to comments 124-88 and 120-72. The Price and Moab Field Offices have worked together to resolve the discrepancy regarding the section of the Green River from Swasey's Beach to the Sand Rafael River. The upper portion of Professor Creek, while not managed as a WSR in Alt C, is protected by other means, including the imposition of NSO or closed for oil and gas leasing and all other surface disturbing activities.

			for wild status in the preferred Alternative C. We are familiar with that stretch and it does meet criteria and should be protected. We would request involvement with any proposed management plan.	
Independent Petroleum Assoc. of Mountain States	203	1	The impacts attributed to oil and gas development are overstated, and the BLM fails to provide a reasoned, scientific basis for many of the proposed decisions and stipulations that unduly restrict energy development. The DRMP/EIS conflicts with statutory and executive policies which pronounce and facilitate oil and gas development, including the adoption of lease mitigation measures in the planning process that are scientifically justifiable and the least restrictive necessary. Without sufficient explanation of the rationale for the stringent stipulations, and compliance with governing energy policies, the DRMP/EIS does not allow for meaningful analysis and informed decision-making required by NEPA, 40 CFR § 1502.9. Therefore, as described, the Preferred Alternative is arbitrary and capricious.	The assumptions utilized to analyze the impacts of oil and gas development are provided in Chapter 4 of the DRMP/EIS. The commentor does not provide any specific information on how the impacts are overstated or are in error. The stipulations proposed for oil and gas leasing were developed as mitigation to protect specific resource values from oil and gas development. The preferred alternative (Alt C) imposed the least restrictive stipulation necessary to protect the resource of concern while still allowing oil and gas development. The justifications for the stipulations proposed for oil and gas leasing are summarized in Appendix C of the DRMP/EIS.
Independent Petroleum Assoc. of Mountain States	203	2	Many of the decisions or possible decisions in this document involve taking large amounts of land that are prospective for development or have development and effectively removing these lands from multiple uses. Lands with so-called wilderness characteristics that receive protection exceed the BLM's authority under FLPMA. In addition, many of these decisions that remove lands from mineral leasing require the BLM to follow FLPMA's withdrawal procedures under 43 USC § 1714. Some of these decisions may exceed the authority granted BLM under its organic act.	The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ."(FLPMA, Secton 103© (43 U.S.C. §1702©) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. Refer to response to comment 214-7 for discussion on withdrawals.
Independent Petroleum	203	3	While the BLM has a duty under section 201 to inventory lands, including those that may contain	The BLM has not and will not impose the WSA non-impairment standard to any of those lands found to

Assoc. of Mountain States			"wilderness characteristics," BLM may not unlawfully apply the WSA non-impairment standard too any of those lands found to contain wilderness characteristics.	contain wilderness characteristics.
Independent Petroleum Assoc. of Mountain States	203	4	FLPMA defines a withdrawal as "withholding an area of Federal land from settllement, sale, location, or entry, under some or all of the general land laws…". By a 2006 Directive, the BLM cannot effect a de facto closure of thousands of acres of public lands to oil and gas leasing without following FLPMA's Secton 204 withdrawal procedures.	There are no withdrawals proposed under any of the alternatives in the DRMP/EIS. Withdrawals only apply to the general land laws which includes the Mining Law of 1872, as amended. The action alternatives do propose removing areas from mineral leasing which is discretionary and does not require a withdrawal. The BLM is not aware of the Directive the commentor is referring to. FLPMA requires the Secretary of the Interior to comply with specified procedural requirements before making a management decision that totally eliminates a principal or major use of the public lands for a period of two or more years on a tract of land more than 100,000 acres in size. If the BLM decides to eliminate a principal use on over 100,000 acres on a tract of land, then we will approach Congress.
Independent Petroleum Assoc. of Mountain States	203	5	The DRMP/EIS proposes thirty three non-WSA lands with wilderness characteristics areas. In Alternative B, all thirty three arreas would be managed to preserve their wilderness characteristics values. As the maps in the IPAMS Ajppendix A attached to the comments show, many of the non-WSA lands that supposedly have wilderness characterisitcs do not meet the criteria for wilderness, and should not be managed as wilderness and closed to oil and gas development.. Human impacts can be seen throughout the areas, including active wells, plugged and abandoned wells, roads,and other imprints of human activity.	Refer to response to comment 124-54 and 121-71.
Independent Petroleum Assoc. of Mountain States	203	6	The BLM received new information regarding non-WSA lands with wilderness characteristics from the Southern Utah Wilderness Alliance (SUWA), but doesn not specify what that new information was. That information should be readily available to the public in order to assess the qulaity of the information.	Information was received from the Southern Utah Wilderness Alliance regarding wilderness proposals both prior to, and during scoping. A reference to this information is made in Appendix P in the DRMP/EIS. This information is part of the adminstrative record for the land use planning process and is available to the public

				upon request.
Independent Petroleum Assoc. of Mountain States	203	7	On page 4-130 it states "Although small acreages may be lost in some of the non-WSA lands with wilderness characteristics, it is not predicted that any of the areas would lose the wilderness characteristics value in whole." IPAMS strongly objects to the characteization of land being "lost" due to oil and gas activitiy. IPAMS would like to remind the BLM that the impacts of oil and gas activity are small and temporary, and hence, there is no need for locking away large amounts of land from energy development.	Any surface disturbing activity, including oil and gas development, results in a loss of the natural character of the land. The degree of the disturbance and the length of time needed for reclamation determine how long the natural character is lost.
Independent Petroleum Assoc. of Mountain States	203	8	No legal or regulatory mandate exists for prohibiting multiple use activities in Areas of Critical Environmental Concern (ACEC), Special Recreation Management Areas (SRMA), and Wild and Scenic Rivers areas (WSRs). The BLM has apparently arbitrarily restricted other multiple use activities in the ACEC and WSR areas (Chapter 2 – Alternatives B,C, and D). The DRMP/EIS (Chapter 2) should state that companies are allowed to request BLM review and approval of other multiple use actives are often compatible with the uses designated for ACECs and WSRs. BLM should not unnecessarily restrict access or activities in these areas if the other proposed activities are compatible with the designated uses for the area, especially if a company proposes mitigation measures.	Refer to response to comment 203-2.
Independent Petroleum Assoc. of Mountain States	203	9	Several of the ACECs do not contain adequate justification for closing those lands to development. Twelve of the fourteen ACECs listed in the RMP have existing leases. While the leases would remain valid until they expire, the potential exists to limit future development in prospective areas because of the ACEC designations, when there are existing laws, stipulations, and policies to protect resources identified in many of the ACECs.	Appendix I of the DRMP/EIS details the relevant and important values identified for the potential ACECs included in the alternatives. These values provide the justification for restricting uses. As noted in Chapter 1 under Planning Criteria and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decision are subject to valid existing rights.

Independent Petroleum Assoc. of Mountain States	203	10	We object to the proposal to designate the following areas as ACECs because the BLM has failed to identify a prevailing need to protect significant values associated with these areas: Behind the Rocks 17,836 acres (5,201 acres in Alt C) Bookcliffs – 304,252 acres Cisco White-Tailed Prairie Dog Complex – 117,481 or 125,620 *difference between page 2-33 and I-9 Colorado River Corridor – 50,483 Labyrinth Canyon – 8,528 Upper Courthouse – 11,529 Westwater Canyon – 5,069 White Wash – 2,988 Wilson Arch – 3,700 Despite BLM's proposal to designate these areas as ACECs, the BLM has not made the case that ACEC designation is necessary to protect the values identified in Appendix I. No justification related to fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened resources have been identified. It seems that the BLM's intent is to arbitrarily create ACEC designations without meeting its own significance criteria in an attempt to placate special interest groups.	The BLM determined that the potential ACECs identified in the DRMP/EIS have relevant and important values which provides the need for protection. Where potential ACECs are designated special management attention would be directed at the relevant and important values.
Independent Petroleum Assoc. of Mountain States	203	11	NEPA and BLM policy require that the BLM make available for public comment the information upon which the decisions to designate ACECs were reached, including the underlying analysis for the proposed and existing ACECs. Isle Royale, 154 F. Supp. 2d at 1127; Trout Unlimited, 509 F2d at 1284; BLM ACEC Manual 1613.06 - .4. The DRMP/EIS does little to disclose to the public how and on what information the proposed ACEC determinations were reached.	In June of 2003 the BLM requested nominations for Areas of Critical Environmental Concern (ACECs). The public was informed through newspaper articles and a planning bulletin. The BLM's findings regarding relevance and importance evaluations were posted on the BLM RMP websites in February 2006. A planning bulletin was released notifying the public of these postings for both the Moab and Monticello Field Offices. The BLM specifically notified nominators of potential ACECs which were found not to meet the relevance and importance criteria.

				The BLM Handbook (1613) regarding Areas of Critical Environmental Concern.
Independent Petroleum Assoc. of Mountain States	203	12	New ACECs can be nominated by a variety of sources, and indeed, the ACECs considered in DRMP/EIS were nominated by various organizations. However, there is a lack of disclosure about these submissions, the materials serving as the basis of analysis by the BLM interdisciplinary team, and how these procedures complied with existing BLM policy. Disclosing this information allows the public to ascertain the quality of information used by BLM, the location of the source of information, and the availability of the information for public review. The DRMP/EIS fails to explain why other management prescriptions or designations in place are inadequate and necessitate the proposed ACEC designations.	See response to comment 203-11. The BLM adhered to the ACEC policy found in Manual 1613.
Independent Petroleum Assoc. of Mountain States	203	13	The DRMP/EIS fails to demonstrate that the proposed ACEC decisions meet the regulatory criteria of importance and relevance. 43 CFR § 1610-7-2. Secondly, many of the identified resource values already receive adequate protection through other management prescriptions. 43 USC § 1702 (a) (ACECs may be designated “where special management attention is required…to prevent irreparable damage”); BLM Manual 1613.51-53 (ACECs unnecessary when other designations are adequate to protect a resource or value.)	A rationale for designating or not designating ACECs in the Preferred Alternative of the DRMP/EIS is found in the Administrative Record referred to as the ACEC Final Report. The List of Threats and the Rationale for Designating or Not Designating ACECs in the Proposed Alternative is available to the public upon request. Relevant text has been added to Appendix I of the PRMP/FEIS.
Independent Petroleum Assoc. of Mountain States	203	14	Many of the proposed ACECs in Alternative B contain portions of existing WSAs. WSA designation already provides a higher level of protection than ACEC designation, making ACEC designation unnecessary in such cases. IPAMS supports the elimination of	WSAs and ACECs are established through different processes and criteria. Therefore it is possible to have overlap of the two designations. In Alt B there is some overlap of ACECs and WSAs; however, in Alt C this overlap was eliminated because it was determined that

			overlapping ACEC and WSA designations in Alternative C. According to FLPMA, the BLM should be applying the least restrictive management technique to protect a resource, and many of the proposed ACECs fail in that regard.	the WSA designation provides sufficient protection for the relevant and important values of the ACECs. The management actions for the ACECs is considered the least restrictive to protect the relevant and important values identified. Where areas were found to meet the relevance and importance criteria for an ACEC
Independent Petroleum Assoc. of Mountain States	203	15	The Reasonable Foreseeable Development (RFD) scenario, which projects the amount of oil and natural gas development within the planning area, is inadequate. The Preferred Alternative projects 435 wells in the next 15 years. Rather than relying on outdated USGS data, the RFD should be based on 3-D seismic activity in the area and the current level of APD activity. APD activity alone suggests the fifteen year RFD should be 975, based on 2006 data of 65 APDs. Well projections must be adjusted in an EIS under each alternative to reflect administrative designations, management practices, and mitigation measures. IM 2004-089, Attachment 1-1 (2004). BLM does not disclose the methodology it used in projecting oil and gas well activity by alternative.	The Reasonably Foreseeable Development scenario was prepared in August 2005 and was revised in September of 2006. The revision in 2006 was prompted by a considerable increase in oil and gas prices and on the ground activity. Up to the present time (2008) oil and gas prices have continued to climb and activity has continued to increase. However, the numbers projected in the revised RFD are still within the range of surface disturbance and the impacts analyzed in the DRMP/EIS. If the trend continues the RFD may have to be revised. The RFD was prepared in accordance with BLM Washington Office IM 2004-89. It is based on geoologic factors, past permitting, and many discussion with oil company personnel (geologists, engineers, and mangers). The methodology used in projecting wells by alternative is explained on pg. 4-83 of the DRMP/EIS.
Independent Petroleum Assoc. of Mountain States	203	16	The Energy Policy Conservation Act of 2000 and executive order 13211 place emphasis on identifying and eliminating impediments to natural gas and oil development. The Preferred Alternative would have a long-term adverse impact on mineral resource development in the planning area by placing additional restrictions on oil and gas development. Even the supposedly most extractive Alternative D would place many additional restrictions on oil and gas	The analysis in Chapter 4 of the DRMP/EIS considers the impacts of restrictive stipulations on oil and gas development. The preferred alternative (Alt C) imposed the least restrictive stipulation necessary to protect the resources of concern while still allowing oil and gas development. The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or

			development..	minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. An Interdisciplinary team of resource specialist, with on-the-ground knowledge of the planning area, analyzed the current management situation, desired conditions, the uses and activities to create a framework to resolve the issues raised through the development of the alternatives. A balanced approach consistent with FLPMA's principles of "multiple use" was a key component of the analysis. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. The DRMP/DEIS contains alternatives which strike an appropriate balance between environmental protection and development of the mineral resources on our public lands consistent with the requirements of the Mining and Mineral law and FLPMA. The PRMP/FEIS will offer BLM management the flexibility to protect resource values and uses while allowing for acceptable levels of mineral

				development.
Independent Petroleum Assoc. of Mountain States	203	17	IPAMS appreciates that the BLM acknowledges the meaning of valid existing rights when it states that existing leases will be managed under the stipulations applied at issuance of the lease. Exploration or development activities on leases that pre-date the revised RMP should not be constrained by management decisions made by the revised RMP.	Existing leases are valid existing rights and are not affected by management decisions in the new Resource Management Plan.
Independent Petroleum Assoc. of Mountain States	203	18	The BLM fails to acknowledge in the DRMP/EIS that the impacts from oil and gas are temporary, the footprint is small, and that reclamation is successful to the point that areas with previous oil and gas activity are now being proposed for wilderness protections. The fact that the impact is temporary – on average 20-30 years, the lifespan of a typical well – means that the activity does not irreparably harm the land and therefore does not require vast acreage to be put off limits. Rather, exploration and production activities are compatible with protecting the land, and locking away vast energy resources is not necessary.	The impacts from oil and gas development are analyzed in Chapter 4 of the DRMP/EIS.
Independent Petroleum Assoc. of Mountain States	203	19	Appendix C in the DRMP/EIS provides a table of surface stipulations applicable to all surface-disturbing activities. The overlapping surface stipulations are extremely restrictive and would result in severe and unacceptable adverse impacts on the ability of oil and gas industry to fulfill its lease obligations within the Moab Field Office planning area.	See response to comment 203-17.
Independent Petroleum Assoc. of Mountain States	203	20	The BLM assumes for purposes of its analysis of the impacts of NSO stipulations that the current extent of directional drilling technology is 1 mile, page 4-84. Directional drilling cannot generally exceed 1200 feet except under very limited circumstances. The BLM cannot assume directional drilling will be feasible over the distances proposed, particularly without specific analysis of the geologic formations involved. Directional drilling is both expensive and technologically challenging and the BLM cannot assume it can be	On pg. 4-84 of the DRMP/EIS it states that the extent of current directional drilling technology in the region is approximately one mile. This estimate was based on actual drilling proposals submitted to the BLM.

			reliable used in every situation. If the BLM is justifying its management decisions based on 1 mile of directional drilling, that analysis needs to be revised.	
Independent Petroleum Assoc. of Mountain States	203	21	Visual Resource Management Restrictions: It is not clear from the document if the designation of large portions of the planning areas as VRM Class II is included in the acres of mineral estate that are considered as subject to major constraints, despite the fact that Class II restrictions would constitute a major impediment on development. Since oil and gas development is temporary disturbance to the surface with temporary visual impacts, as most wells are abandoned after 20 or 30 years, the VRM provisions do not provide a reasonable balance between protecting vistas and developing energy resources needed by the nation. Full field development would be virtually impossible under the Class II designation.	In Appendix C of the DRMP/EIS, a controlled surface use (CSU) leasing stipulation is applied to areas with proposed VRM II management. A CSU stipulation is considered a minor constraint because it still allows for oil and gas development.
Independent Petroleum Assoc. of Mountain States	203	22	Right of Way Exclusion Areas: Denying access to pipelines and roads would further restrict access to land for oil and gas development, beyond the proposed 43% reduction in leasing acreage mentioned in the DRMP/EIS. The DRMP/EIS does not fully analyze the impact to land access and how this restriction would make additional lands inaccessible. The DRMP/EIS does not contain sufficient information to enable operators to evaluate the effect of ROW exclusions on their current and potential operations. Maps of the exclusion areas should be included in the DRMP/EIS.	See response to comment 214-12. In Appendix C of the DRMP/EIS, it states that areas closed to oil and gas leasing are right-of-wat exclusion areas. In Alt C there are 370,250 acres closed to oil and gas leasing and are right-of-way exclusion areas. Most of this acreage is WSAs and designated wilderness which preclude leasing and development by policy and regulation. The WSAs are not subject to management decisions in the land use planning process.
Independent Petroleum Assoc. of Mountain States	203	23	Alternative C would place 370,250 acres in ROW exclusion area, which again would further limit development and most likely make additional lands inaccessible. These further restrictions are not adequately analyzed in terms of EPCA, NEP, and Executive Order No. 13212, nor in terms of the impact on the economy.	See response to comment 203-22. The WSAs were established prior to the existence of the EPCA, NEP, EO No. 13212.
Independent Petroleum	203	24	The BLM has not adequately explained or justified the ROW avoidance and exclusion areas. Oil and gas	See response to comment 214-12.

Assoc. of Mountain States			operators' ability to develop those leases could be significantly impacted if the BLM inappropriately limits access to leases. The BLM must be willing to work with oil and gas lessees and operators to design access routes to proposed oil and gas development projects. If reasonable access is denied, operators cannot develop their leases and significant resources will be lost, in turn, hurting the local economy and federal treasury. While the issuance of the oil and gas leases does not guarantee access to the leasehold, a federal lessee is entitled to use such part of the surface as may be necessary to produce the leased substance. 43 CFR § 3101.1-2 (2006).	
Independent Petroleum Assoc. of Mountain States	203	25	The socioeconomic analysis is fundamentally flawed in terms of depth and underlying assumptions. As stated in section 4.3.12, page 4-252, socioeconomic impacts are only considered significant if one or more of the following occurs and is attributable to the implementation of alternatives: 1) Substantial gains or losses in population/employment; 2) Substantial alterations in lifestyle or quality of life; 3) Disproportionately adverse changes that affect minority or low-income populations. IPAMS believes a major impact that should be considered is a decrease in the energy resources available to the community, state, and nation. Restricting development of vital energy resources is a significant socioeconomic impact at the same scale as those listed above. The analysis does not give adequate weight to the importance of energy supplies at all levels of the economy. Energy development can also positively impact all three of the above impacts, by providing economic growth that positively impacts population, employment, quality of life, and economic opportunities for minorities and low-income individuals.	The BLM expects that energy resource contributions in the Moab Field Office (MFO) will be very small relative to national production or even State production. According to a very recent study done under the auspices of the State of Utah (in cooperation with IPAMS), oil and gas production in Grand County accounts for an extremely small share of the Grand County economy, and virtually no jobs to residents of the County. References to this study and its conclusions have been added to Chapter 4 of the DRMP/DEIS. Moreover, The BLM does not expect to see significant energy development (such as that experienced in Uintah Basin or parts of Wyoming) in the planning area over the life of the plan as described in chapter 4. Therefore, BLM does not expect large (similar to the other areas noted above) socioeconomic benefits or costs from these activities to national, state, or local communities. The DRMP/DEIS Environmental Justice analysis in section 3.6.3 follows Executive Order 12898. This analysis determined there are no environmental justice populations in the socioeconomic study area. In addition, oil and gas development in the DRMP/DEIS study area is not large enough relative to total national and global oil

				and gas development to impact pump prices. Therefore, low-income communities would not be disproportionally impacted from oil and gas development restrictions by the DRMP/DEIS. Thus, actions required to identify and mitigate impacts to such populations are not required.
Independent Petroleum Assoc. of Mountain States	203	26	Despite the positive impacts from economic growth and opportunity from oil and gas development, the DRMP/EIS does not contain a comprehensive analysis of the restrictive management decisions and how they can constrain the current and future development. The socioeconomic analysis admits to this failure in section 4.3.12.1.3, where it is stated that "…it is not likely that BLM-related management decisions (apart from recreation decisions that could increase revenues to recreation-based businesses) would result in significant changes to current population trends." The BLM imposes several layers of severe restrictions on oil and gas development in the DRMP/EIS, and then claims that its decision only affects recreation revenues! This illustrates the fundamentally flawed nature of the analysis.	See response to comment 203-25. As far as the commentor's concern with multiple management layers and restrictions, "layering" is a planning tool. Under FLPMA's multiple-use mandate, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple-use concept, the BLM does not necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands. The process of applying many individual program goals, objectives, and actions to the same area of public lands may be perceived as "layering". The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Inconsistent goals and objectives can lead to resource conflicts, failure to achieve the desired outcomes of a land use plan, and litigation. Whether or not a particular form of management is restrictive depends upon a personal interest or desire to see that public lands are managed in a particular manner. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified for resolution in the land use plan. Layering of program decisions is not

				optional for BLM, but is required by the FLPMA and National BLM planning and program specific regulations. The FLPMA directs BLM to manage public lands for multiple use and sustained yield (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM's Land Use Planning Handbook requires that specific decisions be made for each resource and use (See, Appendix C, Land Use Planning Handbook "H-1601-1"). Specific decisions must be included in each of the alternatives analyzed during development of the land use plan. As each alternative is formulated, each program decision is overlaid with other program decisions and inconsistent decisions are identified and modified so that ultimately a compatible mix of uses and management prescriptions result. For example, the BLM has separate policies and guidelines, as well as criteria, for establishing ACECs and when the WSAs were established. These differing criteria make it possible that the same lands will qualify as both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies. See also response to comment 203-16.
Independent Petroleum Assoc. of Mountain States	203	27	The full positive economic impact of mineral development in the planning area was not adequately analyzed, nor did the document analyze the negative impact associated with the severe restrictions called for in the proposed Preferred Alternative C. In fact, in Table 2.2, page 2-78 – 2-79, it is stated that under Alternative B, the long-term economic benefits from oil and gas would be slightly less than current circumstances or if Alternatives C or D were adopted. It defies logic how the extremely restrictive Alternative B would have only	See responses to comment 203-25 and 203-26. The BLM is unable to determine how the commentor arrived at the conclusion that Alternative B has 43 per cent less acreage available for oil and gas leasing. In fact, Alternative B closes to oil and gas leasing an additional 318,000 acres compared to Alternative A, a reduction of 21.7 per cent. Furthermore, the BLM's preferred alternative (Alternative C) closes to leasing an additional 17,000 acres relative to Alternative A, a

			slightly lower economic benefits from oil and gas when it would place so many restrictions on development. Clearly, that analysis lacks depth. It also defies logic that Alternative B, with 43% less acreage available for oil and gas leasing, would result in such a small negative economic impact. IMPAMS believes the economic analysis fails to account for the lost opportunities due to proposed management decisions, and seriously underestimates the negative impact of Alternative B and other restrictions proposed in the DRMP/EIS.	reduction of 4.8 per cent. This is explicitly described in Table 4.38 of the DRMP/DEIS.
Independent Petroleum Assoc. of Mountain States	203	28	Each alternative contained in the DRMP/EIS includes some lands closed to energy resource development. Such closures are based on the BLM's assessment of resource values on those lands, but closure also has implications in terms of national energy consumption and commodity prices, foregone employment opportunities, tax revenues and support for state and local economies. Although BLM must necessarily base land use decisions on consideration of all resource values, social and economic impacts of closure decisions should be estimated to fulfill the agency's mandate under FLPMA, and to comply with guidelines contained in the BLM's Land Use Planning Handbook (H-1601-H) and Instruction Memorandum No. 2002-167.	See response to comment 203-25. The BLM has expanded its discussion of fiscal impacts to state and local governments in Chapter 4 of the DRMP/DEIS.
Independent Petroleum Assoc. of Mountain States	203	29	BLM also fails to disclose how the restrictions may combine to increase the consumer cost of gas which may be disproportionately borne by low-income populations. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, 59 Fed Reg 7629 (1994).	The DRMP/DEIS Environmental Justice analysis in section 3.13.3 follows Executive Order 12898. This analysis determined there are no environmental justice populations in the socioeconomic study area. In addition, oil and gas development in the DRMP/DEIS study area is not large enough relative to total national and global oil and gas development to impact pump prices. Therefore, low-income communities would not be disproportionally impacted from oil and gas development restrictions by the DRMP/DEIS. Thus, actions required to identify and mitigate impacts to such populations are not required.

Independent Petroleum Assoc. of Mountain States	203	30	In Section 3.13.1.6.2, the BLM acknowledges that the unemployment level in Grand County is nearly twice the state average and San Juan County has the highest unemployment in the state at 11%. Despite this recognition, many of the prescriptions in the DRMP/EIS would limit economic activity by restricting access to oil and gas development. The DRMP/EIS does not properly assess the effects restrictive land management decisions will have on the local economy, and the opportunities denied by severely restricting access to energy resources through a whole range of overlapping restrictions including wilderness-like designation of land, NSO, CSU, VRM, timing limitations, and others. Rather than providing the opportunity for developing energy resources, which would create jobs and diversify the economy away from low-paid, seasonal tourism and recreation jobs, the BLM is proposing land management measures that would restrict the rural economy.	See responses to comments 203-25 and 203-26.
Independent Petroleum Assoc. of Mountain States	203	31	Further, on page 4-261, it is stated that “it is not likely that the employment derived from the drilling and completion of wells in the area would positively impact poverty or unemployment rates in Grand and San Juan counties.” This statement fails to take into account the indirect employment that derives from oil and gas development. In areas throughout Utah and the Intermountain West, areas experiencing oil and gas development generate thousands of jobs in local communities, besides the direct drilling and completion crews. These crews consume services in the local economy, but more importantly, local jobs are created by service and supply companies in areas where drilling occurs, many more than the direct drilling jobs created.	See response to comment 203-25.
Independent Petroleum Assoc. of Mountain States	203	32	A recent study by the University of Utah’s Bureau of Economic and Business Research, which is attached in IPAMS Appendix D, found that the oil and gas industry in Uintah and Duchesne counties accounts for 49.5% of employment and 60% of total wages. The average	See response to comment 203-25.

			wage for exploration and production jobs is $84,795, about 86% higher than the average wage for recreation jobs. These numbers include direct employment numbers of 19.9% of employment and 34.8% of total wages. This shows that the 19.9% of direct employment is multiplied throughout the economy and results in 49.5% of employment, with a similar multiplier effect for wages from 34.8% to 60%. There is no reason to assume, as in the DRMP/EIS, that the same type of multiplier effect would not be seen in Grand and San Juan Counties. The University is working on an additional phase of the study throughout the state. IPAMS recommends that the results of further phases of that study, The Structure and Economic Impact of Utah's Oil and Gas Industry, for Grand and San Juan counties, which will be out in early 2008, be included in the socio-economic analysis in the final RMP/EIS. *See attachment D*	
Independent Petroleum Assoc. of Mountain States	203	33	Section 3.13.1.6.3 points out that per capita personal income has fallen in Grand and San Juan counties in comparison to the rest of the state as mineral activity declined in the area. With the rise in the economic and technical feasibility of developing unconventional resources like those found in the MPA and across the West, Grand and San Juan counties again stand to benefit from oil and gas development. However, the management proposals contained in the DRMP/EIS would constrain that growth and create missed opportunities for the citizens of Grand and San Juan counties. Section 3.13.1.6.5 goes on further to state that "Resident spending of non-local income (dividends, interest, rent) accounted for about 16% of all jobs in the four counties studied. This type of income is closely linked to the type of wealthy households that tend to retire in amenity rich, resort type communities. Again, Grand County may be moving in this direction.	See response to comments 203-25 and 203-26. The commentor seems to assume that amenity-rich communities must choose between retirees and local residents. As discussed in Chapter 3 of the DRMP/DEIS, retirees (as well as second home owners) can make significant contributions to the incomes of local residents. One of the fastest growing segments of the Grand County economy, for example has been construction, much of which is caused by new home construction. Similarly, the tourism industry is the major component of the Grand County economy, providing employment opportunities for long-term and newly arrived residents alike. The commentor is in error in the assumption that the BLM's vision "is one of protected lands so that outsiders can come and retire there, living off their retirement and investment income". The DRMP/DEIS contains no such statement or implication.

			I think citizens of Grand County, especially those who have been in the area for many generations, would be appalled to learn that the vision of the BLM has for their county is one of protected lands so that outsiders can come and retire there, living off their retirement and investment income. IPAMS speculates that the local community would like good opportunities in their communities, so that their children do not have to go off to Salt Lake City or Denver to make money. The citizens of Grand and San Juan counties have the opportunity to benefit from reasonable development of their oil and gas resources so that they can build up their investment portfolios, rather than being relegated to low-paying tourism jobs and service jobs for wealthy retirees. That is the economic vision that IPAMS believes the BLM should support in the DRMP/EIS, not the one of keeping the locals in low-paying service jobs for wealthy outsiders.	The commentor assumes that, were it not for BLM decisions, there would be a large increase in minerals-related employment in the planning area. In fact, the commentor's own organization's assisted study underscores the very low presence of this industry in the local economy.
Independent Petroleum Assoc. of Mountain States	203	34	Section 3.13.1.6.7 states that the tourist contribution to the Grand County economy continues to remain around $100 million per year. There should be a similar statement of the contribution of the oil and gas industry to the economy, and the projected contribution for each of the Alternatives.	See response to comment 203-25.
Independent Petroleum Assoc. of Mountain States	203	35	Despite the deference given to the tourism sector of the economy in the DRMP/EIS, the analysis goes on to project that tourism-related revenues appear to have leveled off and are not expected to make gains in the future. A more balanced DRMP/EIS would enable the local economy to continue to enjoy the steady benefits of the tourism economy while achieving growth through responsible energy development that is not artificially restricted as proposed in the DRMP/EIS.	See response to comment 203-25.
Independent Petroleum Assoc. of Mountain	203	36	On page 3-113, the analysis of the contribution of mineral resources, which as mentioned above does not provide an overall economic contribution of oil and gas, notes that production peaked in 1994 and has declined	The BLM has incorporated updated production data in Chapter 3 of the DRMP/DEIS. State of Utah (Utah Division of Oil, Gas and Mining) data shows a continuing decline in production in Grand County through 2007. The

States			since. However, since the data stops at 2000, just about the time that oil and gas commodity prices started to rise, and coupled with advances in the technology to recover unconventional resources, production throughout Utah and the Intermountain west started to soar. In fact, production throughout the Rockies has increased by 69% since 1996, as shown in the graph below. Development of unconventional resources in the MPA is on the cusp of similar growth. Therefore the analysis is outdated and does not realistically assess the economic contributions of the industry. *see graph in letter*	BLM acknowledges that production could increase in the future, and has incorporated its predictions of future well activity in its RFD.
Independent Petroleum Assoc. of Mountain States	203	37	The Sonoran Institute, the Wilderness Society, and other groups devoted to wilderness designation and opposed to oil and gas development have released studies over the years minimizing the economic importance of the industry and claiming that protected public lands actually result in a greater economic benefit than mineral extraction. Despite the obvious bias of these studies being done by groups that are advocating for more wilderness, these studies are fundamentally flawed in several respects. (We acknowledge that IPAMS could be accused of bias in the opposite direction, were we to issue our own studies. That is why we instead use studies and data from unbiased, third-party organizations such as the University of Utah and the Colorado School of Mines.) We urge the BLM not to be confused by these subjective studies and fall into the trap of minimizing an important industry for rural economies in the MPA, Utah and throughout the Intermountain West. A further problem with studies such as the Wilderness Society study is that they are based on old data which excludes the benefits experienced in the Intermountain West form the phenomenal growth of the industry from 2000 to present. In fact, a Wilderness Society report is one of the references for the DRMP/EIS. IPAMS urges the	See response to comment 203-25. The BLM has not “incorporated” studies by the Wilderness Society, but has referenced them in guarded terms. The BLM has also incorporated studies done by the University of Utah for the State of Utah; these studies, it should be noted, were done with IPAM’s support and assistance.

			BLM to reconsider any analysis based on the Wilderness Society report, given the biased, unscientific nature of their work.	
Independent Petroleum Assoc. of Mountain States	203	38	Surface disturbance from oil and gas exploration and production activities is calculated at 15 acres per well in the MPA. This is out of line with the usual calculation of surface disturbance used by the BLM throughout the Intermountain West. Usually the BLM calculates surface disturbance as five acres per well. While it could be argued that disturbance would be greater in the MPA because of the remote locations and thus more miles of roads are necessary, this argument does not stand up because many locations throughout the West are just as remote. Surface disturbance throughout the DRMP/EIS should be recalculated using the standard 5 acres per well.	The analysis assumption utilized in Chapter 4 of the DRMP/EIS pertaining to surface disturbance for oil and gas development is 15 acres per well. This estimate is based on the BLM's experience. The remoteness of the area requires more miles of roads and utilities.
Independent Petroleum Assoc. of Mountain States	203	39	Table 4.3 Summary of Total Predicted Surface Disturbance for Mineral Development Activities in section 4.1.3.10, page 4-7 is based on the erroneous 15-acre-per-well disturbance, as well as the assumption that 1,500 acres would be reclaimed over the fifteen year life of the plan, and only wells drilled in the first five years would be successfully reclaimed within the life of the plan. This assumption is pessimistic, and does not take into account the interim reclamation and different vegetation types. Operators throughout the West routinely reclaim land right up to the well head once a well head is drilled, so that a very small amount remains disturbed per well. The chart should be redone using a 50% interim reclamation assumption per well and a five acre disturbance per well.	See response to comment 203-38. The estimate for the time need to reclaim disturbed areas is based on BLM experience in this area.
Independent Petroleum Assoc. of Mountain States	203	40	In addition, the potential habitat for Gunnison Sage Grouse, timing limitations would apply from March 20th to May 15th each year. In the potential habitat for Greater Sage Grouse, timing limitations would apply from March 1st to May 15th each year. However, the DRMP/EIS should instead specify a buffer around the	The Gunnison sage grouse is a sensitive status species. Although some experts, such as Connolly, suggest a buffer of 2 miles, the BLM has established a minimum buffer of 0.5 miles as necessary to protect this species. The restriction imposed in the DRMP/EIS is to be enlisted in sage grouse habitat only if safe grouse occupancy is

			actual nesting habitat, as is common practice throughout the Intermountain West, rather than a blanket restriction for the entire potential habitat. The highest concentration of nesting is within two miles of a lek. Therefore, the final RMP/EIS should only limit activity within a two mile buffer around the leks in the 175,727 acres of habitat for Gunnison and the 3,068 acres for Greater Sage Grouse, rather than a blanket timing restriction in areas that may or may not have sage grouse. According to a study by R.C. Kaiser, (2006, Recruitment by greater sage-grouse in association with natural gas development in Western Wyoming, Thesis, University of Wyoming, Laramie, USA), two-mile stipulations are effective in protecting nesting and brood-rearing habitat and preserving breeding behavior.	determined. Currently, the Moab BLM has no active Gunnison sage grouse leks.
Independent Petroleum Assoc. of Mountain States	203	41	Table C.1, in the stipulation descriptions, for example for sage grouse habitat on page C-22, an exception may be granted "…if the operator submits a plan which demonstrates that impacts from the action would not result in any net loss of habitat." This should explicitly allow for the use of off-site mitigation in the operator's plan to demonstrate no net loss of habitat.	If an operator choses to offer off-site mitigation, the BLM can accept this offer. Off-site mitigation can be considered on a site-specific basis, and it is not a land use planning decision.
Independent Petroleum Assoc. of Mountain States	203	42	On pages 2-46 the BLM describes various management actions and mitigation requirements for relating to greater sage-grouse habitats. The BLM's proposed management for greater sage-grouse is unduly restrictive, particularly under Alternative B. The BLM cannot impose conditions of approval or other limitations which are inconsistent with the lease rights granted. In particular, the BLM's proposal to prohibit all permanent above ground facilities within two miles of an active lek is unnecessarily restrictive when anti-perch devise can be installed as necessary to protect areas with leks.	The BLM proposes to choose Alt C, not B. All valid existing rights granted prior to the issuance of the ROD would be recognized under the lease conditions that were granted at the time of the lease.
Independent Petroleum	203	43	Prairie Dog Habitat: IPAMS prefers the management measures in Alternative A, but if restrictions for prairie	The BLM proposes to choose Alt. C, which proposes a buffer of 660 feet around active prairie dog colonies.

Assoc. of Mountain States			dogs are instituted, the BLM should choose the proposal in Alternatives C and D for CSU stipulations within 660 feet of active prairie dog colonies, rather than the blanket application of NSO and CSU within all potential habitat specified in Alternative B.	
Independent Petroleum Assoc. of Mountain States	203	44	On page 2-7 of the DRMP/EIS the BLM states the following management action would be common to all alternatives: “Manage all BLM-authorized activities to maintain air quality within the thresholds established by the State of Utah Ambient Air Quality Standards and to ensure that those activities continue to keep the area as attainment, meet prevention of significant deterioration (PSD) Class II standards, and protect the Class I air shed of the National Parks (e.g., Arches and Canyonlands National Parks).” The BLM must significantly revise this proposed management action because it violates the Clean Air Act (CAA) and potentially unreasonably limits the BLM’s ability to effectively manage the public lands. The BLM does not have any direct authority over air quality or air emissions under the Clean Air Act (CAA). 42 USC §§ 7401 et seq. Under the express terms of the CAA, the EPA has the authority to regulate air emissions. In Utah, the EPA has delegated its authority to the State of Utah, Department of Environmental Quality (UDEQ). The Secretary of the Interior, through the Interior Board of Land Appeals (IBLA) has recognized that the state department of environmental quality, not the BLM has authority over air emissions. Wyoming Outdoor Council, et al., IBLA No. 2006-155, Order at *12 (June 28, 2006). The BLM does not have authority to regulate emissions in Utah. The BLM must eliminate or revise the proposed management action.	See response to comment 214-10.
Independent Petroleum Assoc. of Mountain	203	45	In section 3.2.2, Status of Emissions page 3-8, it states that the emissions sources with in the MPA consist mostly of oil and gas development facilities. However, as in many areas, mobile sources contribute	Data regarding non-point source emissions (including OHVs) are listed on pg. 3-9 under "Additional Sources of Emissions". Section 3.2.2 lists point emission sources.

States			significantly to any air pollution. Given the large amount of vehicular traffic for tourism and OHV recreation, mobile sources are likely a large contributor of emissions in the MPA, and should be included in the analysis. In fact, the source attribution work done by the Colorado Department of Public Health and Environment (CDPHE) for the Denver ozone area showed a low contribution from oil and gas and the New Mexico Environment Department's work around ozone in the Farmington, NM area also showed contribution from oil and gas sources. In both cases, the largest source was boundary conditions transporting into the region.	
Independent Petroleum Assoc. of Mountain States	203	46	IPAMS does not believe that the DRMP/EIS achieves the right balance of resource protection and energy development. The Moab Field Office has undervalued the oil and gas resource potential in the MPA, and feels free to place major restrictions on development of that resource. The DRMP/EIS places many layers of restriction on oil and gas development, while at the same time down playing the extent of those restrictions. The final RMP/EIS should be revised to reduce the restrictions, and the BLM should not incorporate additional aspects of Alternative B in the Record of Decision. The BLM should be following the dictates of the EPCA to reduce restrictions and encourage development of energy resources, not increase restrictions. The Moab DRMP/EIS has failed to adequately consider reasonable access to federal and private minerals and to consider the effects it proposed management strategy will have on current and future oil and gas exploration and development activities, and on the rural economy. Many of the new restrictions specified in the DRMP/EIS are unnecessary since oil and gas producers currently comply with existing laws protecting water, air, cultural, and other resources.	The BLM has identifed Alt C as the preferred alternative, which the BLM contends reaches a balance between resource protection and resource production. The BLM has proposed restrictions in Alt. C to protect resource values. These restrictions represent the minimal necessary to protect these values. For example, the visual restrictions imposed surrounding Arches National Park are controlled surface use. Controlled surface use is the least restrictive to protect the viewshed from Arches while still allowing for oil and gas development. The land around Arches National Park could have been restricted with a no surface occupancy stiipulation, but this stipulation was not deemed to be the least restrictive stipulation.

			Please select Alternative A or D in the final RMP, and not Alternative B, which would severely restrict the economic growth of Grand and San Juan counties. Please ensure that the restrictive aspects of Alterative B are not added to the alternative that is ultimately selected.	
Independent Petroleum Assoc. of Mountain States	203	47	IPAMS does not believe that the DRMP/EIS achieves the right balance of resource protection and energy development. The Moab Field Office has undervalued the oil and gas resource potential in the MPA, and feels free to place major restrictions on development of that resource. The DRMP/EIS places many layers of restriction on oil and gas development, while at the same time down playing the extent of those restrictions. The final RMP/EIS should be revised to reduce the restrictions, and the BLM should not incorporate additional aspects of Alternative B in the Record of Decision. The BLM should be following the dictates of the EPCA to reduce restrictions and encourage development of energy resources, not increase restrictions. The Moab DRMP/EIS has failed to adequately consider reasonable access to federal and private minerals and to consider the effects it proposed management strategy will have on current and future oil and gas exploration and development activities, and on the rural economy. Many of the new restrictions specified in the DRMP/EIS are unnecessary since oil and gas producers currently comply with existing laws protecting water, air, cultural, and other resources. Please select Alternative A or D in the final RMP, and not Alternative B, which would severely restrict the economic growth of Grand and San Juan counties. Please ensure that the restrictive aspects of Alterative B are not added to the alternative that is ultimately selected.	The DRMP/DEIS contains alternatives which strike an appropriate balance between environmental protection and development of the mineral resources on our public lands consistent with the requirements of FLPMA. The PRMP/FEIS will offer BLM management the flexibility to protect resource values and uses while allowing for acceptable levels of mineral development. In accordance with the Energy Policy Conservation Act, the least restrictive stipulations were applied in the preferred alternative to protect important natural resources. See response to comments 203-46 and 210-2.

The Nature Conservancy	204	1	In addition to the species in the MPA with formal status as listed above, we urge that special attention be given to one additional plant: Astragalus iselyi (Isely's milkvetch). At present this plant has no special status. We had recommended that it be added to the Utah BLM list of Sensitive Plants when that list was being reviewed for revision in March 2007. Through no revised BLM Sensitive Plant list has yet resulted from that process, the status of Astragalus iselyi as a G1 (globally impared) taxon is still valid, and potential threats to its occurrences – ALL of which world-wide are within the MPA – remain active and potent (renewed uranium prospecting, OHV use, etc.). The need for special status is heightened by a particular proposal for public-land disposal that appears within the three Action Alternatives of the DRMP. This action would, if implemented, remove from BLM control a major population center for this plant, probably increasing the need for BLM Sensitive designation of the remaining occurrences, and possibly creating a rationale for federal listing of the whole species.	The Moab RMP does not add or subtract potential special status species to the Utah BLM list of Sensitive Plants. Parcel R-11, which contains habitat for the astragalus iselyi, has been removed from the list of lands identified for disposal.
The Nature Conservancy	204	2	The MPA contains several ecological communities or habitats that are of conservation concern by virtue of scarcity, sensitivity, decline, and/or importance to SSS. Perhaps of greatest merit for conservation attention in the Final FMP are: (1) riparian areas, especially at lower elevations; (2) sagebrush shrubland and steppe communities; and (3) presence of biological (cryptobiotic) soil crusts in appropriate habitats.	The DRMP/EIS provides protection for riparian areas by disallowing oil and gas development and other surface disturbing activities, in accordance with Utah Riparian Policy. Provisions are made to enhance sagebrush steppe communities throughout the document. In addition, the limiting of OHVs to designated routes throughout the MPA (except for 2,000 acres within the White Wash Sand Dunes) is intended to limit damage to biological soil crusts, among other resources.
The Nature Conservancy	204	3	Ideally, in the words of BLM Manual 6840.22A "Land use plans shall be sufficiently detailed to identify and resolve significant land use conflicts with special status species without deferring conflict resolution to implementation-level planning." However, the necessarily coarse level of resolution in an RMP may make it difficult to fine-tune every land allocation or	Analysis of impact to Special Status Species is required for every site-specific, implementation level action. The intent of the RMP is to provide the guidance to give protection to Special Status Species. The decisions on pgs. 2-44 through 2-48 do this. In addition, see the specific stipulations for oil and gas leasing and other surface disturbing activities that are imposed as a result

			resource use decision within it so that every potential conflict is avoided. Therefore, the RMP must ensure in over-arching terms that provisions for the conservation of SSS, particularly objectives from approved recovery plans and conservation agreements, are given priority. Then when subsequent activity-level plans and projects are developed, with their attendant EAs, the RMP serves as the higher-tier authority for requiring that unacceptable adverse effects to SSS do not occur at the finer scales of planning and implementation that are relevant to the occurrences of those species.	of management for special status species.
The Nature Conservancy	204	4	Under section 2.1.1.5 Special Status Species (page 2-5), the DRMP states that “Land use plan decisions should be consistent with…” various mandates, plans and agreements for T and E species. A stronger and more accurate statement to put into the Final RMP is that “Land use plan decisions must be consistent with…” those mandates and agreements etc.	The verb has been changed from 'should' to "must" in two places in the first sentence on pg. 2-5 of the DRMP/EIS to reflect the strength of the agreements and mandates to which the BLM is subject regarding special status species.
The Nature Conservancy	204	5	Under Management Common to All Alternatives, one point states that “The protection of habitat for listed and non-listed plant and animal species would be considered prior to authorizing any actions that could alter or disturb such habitat.” While it is fine to consider such SSS habitat protection, the BLM needs to give primacy to the conservation of SSS in such cases—not necessarily a wholesale halting or precluding of other valid uses of public lands, but fine-scale design of such uses so as to be compatible with the priority of maintaining SSS habitats/occurrences.	The BLM is mandated to give primacy to the conservation of special status species.
The Nature Conservancy	204	6	Under Management Common to All Alternatives, a point states that “No management action would be permitted on public lands that would jeopardize the continued existence of plant or animal species that are listed or are officially proposed or are candidates for listing as T&E.” Given that the BLM Manual 6840.06E and the DRMP (page 3-140) provide Sensitive species with (at least) the same level of protection as Candidate	The BLM is aware of its obligation to prevent sensitive species from being listed on the Endangered Species list.

			species, then we would read this statement as being applicable to BLM Sensitive Species as well.	
The Nature Conservancy	204	7	The final RMP must be explicit about giving priority to maintenance of SSS over the implementation of resources uses that may have adverse impacts on those species. For example, appreciable areas of the MPA that would be open to oil and gas leasing with standard stipulations or special stipulations under Alternatives C and D (Maps 2-5-C, 2-5-D) contain many occurrences of sensitive species, which must be maintained in the face of potential adverse impacts from energy actions and other resource uses. These Alternatives, and more importantly the Final RMP, would be acceptable in this regard only if the Standard and Special (CSU/TL) leasing categories contain specific, effective stipulations against adverse impact to SSS. Further, because on-the-ground implementation of the RMP's protective measures for SSS would happen at the project-planning or activity level, it is of the utmost importance that the strategic level RMP explicitly mandate the protection of SSS as over-arching policy with which all finer-level actions must comply. Simply put, it is the SSS that must have primacy over resources uses where the two may conflict, not the other way around. The reason this subject is so crucial, and that we repeat and emphasize it so greatly, is that the MPA contains several species that are found nowhere else. For example, the entire world-wide distributions of three special status plants [plus one worthy of Sensitive status], and most of the entire distributions of three other plants, occur within the MPA: Entire distribution within MPA: Astragalus sabulosus var. sabulosus, Astragalus sabulosus var. vehiculus, Mentzeila shultziorum, [Astragalus iselyi] Most of distribution within MPA: Lomatium latibloum,	BLM Policy 6840, Special Status Species Management, provides policy and guidance to conserve all special status speis, including "those designated by each State Director as sensitive". No BLM actions would be permitted that would lead to the listing of or harm to any of the species mentioned by the commentor.

			Oreoxis trotteri, Pediomelum aromaticum var. tuhyi Few or no alternate opportunities exist to conserve or maintain these seven plants elsewhere outside the MPA. If they are not conserved here, then they are vulnerable to extinction or (at best) would require more stringent federal listing.	
The Nature Conservancy	204	8	It would also be worthwhile to repeat the commitment to meet the Standards for Rangeland Health (as on Page 2-12) under Management Common to All Alternatives for Vegetation (Page 2-50), because uses other than grazing affect vegetation.	The BLM's commitment to meet the Standards for Rangeland Health are described under Livestock Grazing, but do apply to all uses.
The Nature Conservancy	204	9	We would recommend that all statements referenced above that demonstrate commitment to conserve or enhance SSS and "healthy" vegetation communities be carried forward into the Final RMP as broadly and strongly (i.e. as Management Common to All Alternatives) as possible.	The statements in the DRMP/EIS have been carried forward to the PRMP/FEIS.
The Nature Conservancy	204	10	We would prefer to see this area (Colorado River Corridor Potential ACEC) – or at least our (TNC-proposed) smaller "Professor Valley" subset of it – formally designated as an ACEC in the Final RMP for two primary reasons: 1) The biotic resources that are not only relevant and important, but highly worthy of special management attention. Two such examples include an abundance of the Listed-Threatened Jones cycladenia (Cycladenia humilis var. jonesii), and presence of the entire world-wide distribution of the Sensitive Shultz stickleaf (Mentzelia shultziorum), in a very popular area that supports a great deal of recreational use. 2) The Nature Conservancy considers the Colorado River Corridor to be a very high priority for conservation, and accordingly we have a relatively long history (15+ years) of putting substantial resources into this area. These mostly involve acquisitions of title or conservation easements on multiple tracts of private lands in the corridor, such as the Mayberry Orchard and	The BLM is well aware of the biotic resources of Professor Valley. An ACEC was analyzed in Alt B of the DRMP/EIS. The ACEC designation was not carried forward to the preferred alternative because it was felt that other management actions imposed in Alt C for the area were sufficient to protect the biotic resources. The following paragraph has been added to Appendix I of the PRMP/FEIS detailing the rationale for not designating the Colorado River Corridor Potential ACEC in Alt C: The Colorado River Corridor was not proposed in the preferred alternative because routine management prescriptions are sufficient to protect the resources or values from risks or threats of damage/degradation. The Colorado River Corridor will be managed as the Colorado Riverway SRMA, and management prescriptions will be utilized to protect the scenic, fish and wildlife and natural systems: rare plants resources: Stipulations will be placed on oil, gas and mineral development to protect the above values. These stipulations include no surface

			Matheson Wetlands Preserves. Given this demonstrated private-sector commitment to conservation on our part, we recommend a complementary effort be made by BLM to give formal recognition to the biotic values of the public lands in this area, or at least the Professor Valley portion of it, by virtue of the ACEC title. At an absolute minimum, the Final RMP must contain management prescriptions for resources and uses that protect and enhance the biotic values of the Colorado River Corridor area. It is more important to have the needed management without a title, than to have a title without the needed management. So while we would strongly prefer ACEC designation of this area, we would not actively oppose its failure to be so designated – provided that the management of the area is adequate.	occupancy and closed for oil and gas activities and all other surface disturbing uses. Motorized activity will be allowed only on designated routes. The Endangered Species Act will be employed to protect the endangered fish. Visual Resource Management will include Class I and II VRM within the area to protect the unique scenic values. Recreation activities such as camping will be limited to campgrounds in order to avoid unacceptable impacts to the resources. The management of uses in the Colorado River Corridor is very restrictive and has been deemed sufficient to protect the relevant and important values of the ACEC. The imposition of a no surface occupancy (or closed) restriction on oil and gas leasing and all other surface disturbing activities is protective of all biotic resources.
The Nature Conservancy	204	11	*See DRMP 2-48* Finally, within this area we would like to see the designation of motorized travel on the road up Ida Gulch from Hwy 128 proceed no farther up-valley than the northern boundary of our section of private land (Sec 32, T24S R23E, SLM) in Ida Gulch. In the DRMP under all Action Alternatives this route is shown as designated for motorized travel through our property and onto BLM-administered lands to the east. We do not oppose non-motorized travel on this route through our property, but would like to see motorized travel terminate at our boundary, and are prepared to construct a gate there for this purpose.	The BLM does not designate routes on private land. The Nature Conservancy may restrict travel on this route. The route will be removed from the designated travel maps in Alts C and D. This would restrict all motorized travel past the Nature Conservancy's private land.
The Nature Conservancy	204	12	If the ACEC boundary of Alternative C is brought forward into the Final RMP, then another concern could arise in the future: If the day ever comes when the interim status of WSAs is resolved by Congress (as designated wilderness or not), and if the Behind the Rocks WSA does not become wilderness, then we recommend that these 12,635 “released” acres receive the same ACEC title and management as the 5,201	Should WSAs be released by Congress, the RMP stipulates that a plan amendment be done for those WSAs that are released. This is stated on pg. 2-43 of the DRMP/EIS. At the time that the Behind the Rocks WSA acres might be "released", a proposal for extending the ACEC could be suggested as part of the plan amendment addressing that release.

			acres would under this new RMP. We don't know if this can be stipulated as a potential future condition in this pending RMP, or if a Plan Amendment would be required at the time that this situation came to pass.	
The Nature Conservancy	204	13	Upper Courthouse: we would prefer to see this area formally designated as an ACEC according to its treatment in Alternative B- or at least the smaller subset of this area as presented in our original proposal (ca. 7,600 acres). At an absolute minimum, the Final RMP must contain management prescriptions for resources/uses that protect and enhance the biotic values of the Upper Courthouse area. So while we would strongly prefer ACEC designation of this area, we would not actively oppose its failure to be so designated – provided that the management of the area is adequate. The items under Alternative C seem less than adequate because they focus provisions for the two Sensitive plants, particularly the State Station milkvetch which occurs on the flats below the mesas, right in the midst of a zone of very heavy motorized-vehicle camping use. Further, as best as we can interpret Map 2-5-C, the zone of No Surface Occupancy stipulation for oil and gas leasing (and preclusion of other surface-disturbing activities) under alternative C does not extend quite far enough to the north and northeast to cover all the known clusters of the Stage Station milkvetch. Therefore, if ACEC designation is not done in the Final RMP, we recommend carrying forward all of the Special Management items that now appear under Alternative B – including a northward extension of the NSO stipulation area – into the Final.	The biotic values of the Upper Courthouse area are protected by BLM Policy 6840 - Special Status Species Management. The BLM recognizes the biotic values in this area. Portions of the area are to be managed as No Surface Occupancy. In all areas, state sensitive plants would be protected under Policy 6840. All BLM approved actions would be required to avoid state sensitive plants. Recreation impacts in the area are addressed in the DRMP/EIS. All travel is to be limited to designated routes. The area is subject to camping restrictions, and a future campground is recommended to concentrate campers in one area. When campsites in the area are designated, all sensitive plants would be avoided.
The Nature Conservancy	204	14	As a final comment on this subject, all of the ACECs designated in the MPA through the Final RMP should have subsequent management plans prepared and implemented for them. Such management plans would: 1) gather in one document all of the RMP-level management actions or prescriptions that apply to each	The BLM has the discretion to undertake an ACEC management plan for each ACEC designated in the PRMP/EIS. This is clearly stated in the ACEC Manual (1613.62).

			ACEC; and 2) identify more-detailed and/or proactive finer-scale actions needed in each ACEC, as tiered to the RMP.	
The Nature Conservancy	204	15	All three Action Alternatives identify the same set of public-land parcels as suitable for disposal (Map 2-3 and Appendix D). We recommend that one particular parcel be removed from this list, either in whole or at least the parts of it that support an important biological resources. The parcel in question is R-11, consisting of S½ NE ¼ and SE ¼ of Section 19; Section 20 (all) and Sec 21 (all) of T27S R23E (SLM). This parcel contains a major population center of the rare Isely's milkvetch (Astragalus iselyi), a plant that is not on the current (August 2002) BLM Sensitive Plant list for Utah, but which has been proposed for addition to a revised Sensitive list that has not yet been finalized and approved. [See paragraph at the bottom of page 2 of this letter for additional information on this species.] Disposal of this parcel would remove from BLM control a significant portion of this plant's total numbers, given that its entire world-wide distribution lies within the MPA. The transfer of this parcel into either private or SITLA ownership (it is adjacent to a sizable SITLA block) would great increase the likelihood of development that would be detrimental to this occurrence of Astragalus iselyi. Such a situation could lead to the need for more stringent protective status or listing for this plant. The best way to avoid this undesirable scenario is to remove parcel R-11 from the suitable-for disposal category – a course that we strongly urge the BLM to adopt in the Final RMP.	Parcel R-11 has been removed from the list of lands available for disposal under all alternatives.
The Nature Conservancy	204	16	We recommend that rangeland assessments be done per Interpreting Indicators of Rangeland Health (Tech. Ref. 1734-6, 2000 or latest version) in order to know when those Standards are (and are not) being met. These items should all be carried forward into the Final RMP. The same should be done for the policy and	The guidelines referred to by the commentor are used in the permit renewal process as part of Standards for Rangeland Health and Guidelines for Grazing Management. This is part of the Standrads and Guidelines Process and does not need to be included in the RMP.

			procedures that are stated regarding Relinquishment of Preference.	
The Nature Conservancy	204	17	In providing for parking and managing the King's Bench route as a hiking route (page 2-20), we urge that only the minium be done to satisfy access and resource-protection issues. We do not want to see this area publicized as an entry point that draws large numbers of people into the Behind the Rocks fins, which support several Sensitive Plants (chiefly Lomatium latilobum) and pockets of relict vegetation and soil crusts.	Although this is a site-specific action, there is no intention to make the King's Bench route into a major entry point for Behind the Rocks.
The Nature Conservancy	204	18	Reference is made on Page 2-21 to allowing motorized travel use on (among other routes) "the motorized access route to the viewpoint of Ida Gulch (the saddle between Adobe Mesa and Castle Rock)." This appears to be confusing, because (to our knowledge) the saddle between Adobe Mesa and Castle Rock does not look down northward into Ida Gulch, but into an unnamed side drainage of Professor Creek. Motorized access into this saddle from the south (Castle Valley side) via a single designated route is fine. The view down into Ida Gulch is obtained from the saddle between Castle Rock and Parriott Mesa – a saddle to which motorized travel must NOT be allowed from either direction, i.e. the foot path up from the Castle Valley side, or the road into Ida Gulch from Highway 128.	The commentor is correct that the route looks downward into Professor Valley and not into Ida Gulch. The wording has been corrected. The route that ascends the ridge and looks down into Ida Gulch is and will remain non-motorized only.
The Nature Conservancy	204	19	With regard to camping locations and/or restrictions in Labyrinth Rim/Gemini Bridges proposed SRMA listed under Alternatives B and C (page 2-23), we do not recommend one or the other specific set up stipulations. Rather, we more generally raise a concern that while camping in the designated locations may be acceptable per se, adverse impacts are likely to occur in areas surrounding the camping location(s) by some number of irresponsible OHV riders who are camped there. This is a large potential concern for the State Station milkvetch (Astragalus sabulosus var. vehiculus), the only known location for which is in the area north and northeast of	Providing designated campgrounds and campsites in the Upper Courthouse area is a management action precisely to protect the resources at risk mentioned by the commentor. There would be a site-specific NEPA document prepared concerning any camping facilities in the area. At the time of the preparation of this EA, fencing or other actions could be proposed as mitigation. All travel in this area would be limited to designated routes. All off-road travel would be illegal and citable.

			Courthouse rock. Any campgrounds of designated campsites established in this area must be well managed and monitored for impacts to surrounding lands.	
The Nature Conservancy	204	20	Alternative C provides for a Tusher Slickrock Mountain Biking Focus Area and a Barlett Slickrock Freeride Focus Area. These are both within the range of known occurrences of the Sensitive Trotter's oreoxis (Oreoxis trotteri). At present we do not have sufficient information to assess the potential for adverse impacts to this plant from these Focus Area proposals, but suggest that inventories be done prior to ratifying these Focus Areas in the Final RMP.	The freeriding opportunities are mapped so as to be on rock only. The BLM has observational data that mountain bike use will not harm the population of Trotter's oreoxsis. The primary population of Trotter's oreoxsis is on the mesa between Mill and Courtouse washes. This mesa is off limits to all wheeled vehicles, and is to be managed as no surface occupancy for all surface disturbing activities. The BLM invites the commentor to work toward providing protective measures for the Trotter's oreoxis that may occur near the freeride focus areas. Protective measures such as signing and fencing could be imposed if such actions are necessary to protect this rare plant.
The Nature Conservancy	204	21	We notice that the next-to-last item under Management Common to All Action Alternatives refers to grazing not being authorized on portions of Beaver Creek – which we support, but which appears to be inconsistent with the treatment of Beaver Creek in Alternatives C and D on Page 2-13. Further, this list contains reference to "Bogart," and in this context it is not clear if it refers to grazing not being authorized on the entire Bogart Allotment (which we support), or just along portions of streams within that allotment.	The reference to Beaver Creek and Bogart being unavailable for grazing in Riparian: Management Common to All Action Alternatives is incorrect and this error has been corrected.)
The Nature Conservancy	204	22	We support the provision for evaluating non-functioning and functioning-at-risk riparian areas under Alternatives B and C. However, the distinction between the two Alternatives in terms of exclusion (in B) versus restriction (in C) seems artificial and too rigid. Instead, each prescription – exclusion or restriction – should be applied where appropriate according to riparian resource conditions and management opportunities, and not according to a blanket, across-the-board approach as implied in the DRMP. [This same comment	Evaluating at-risk streams is an administrative procedure and does not require a land use planning decision. Assessing riparian functioning condition is an on-going process. The BLM utilizes the Utah Riparian Policy (IM 2005-91), which seeks to "establish an aggressive riparian area management program that will identify, maintain, restore and/or improve riparian values to achieve a healthy and productive ecologocal condition for maximum long-term benefits."

			applies to the treatment of grazing in riparian areas under Alternatives B and C at the bottom of DRMP Page 2-13.]	Grazing in riparian areas is addressed on a case-by-case basis at the time of the grazing permit renewal . Site specific analysis of riparian areas is part of the Standards for Rangeland Health and Guidelines for Grazing Management process.
The Nature Conservancy	204	23	Soils and Watershed (Pg 2-31—2-32) The items listed under Management Common to All and All Action Alternatives are generally good and should be carried forward into the Final RMP. Several items under the latter heading, though very desirable, are stated pretty vaguely, for example: -Maintain vegetation based on desired future condition to provide adequate ground cover to prevent accelerated erosion in wind erodible soils. –Maintain or improve soil quality and long-term soil productivity through the implementation of Standards for Rangeland Health and other soil protection measures. –Manage uses to minimize and mitigate damage to soils. -Maintain and/or restore overall watershed health and reduce erosion, stream sedimentation, and salinization of water. The key to making these items more specific and measurable, so that accomplishment (or not) can be judged, is mentioned within the second of these points. Implementing Standards for Rangeland Health in a credible way calls for a robust effort to conduct range and watershed assessments according to Interpreting Indicators of Rangeland Health (Tech. Ref. 1734-6, 2000 or latest version) in order to know when those standards are (and are not) being met.	Interpreting Indicators of Rangeland Health (Tech. Ref. 1734-6, 2000) is utilized during the permit renewal process. It is the impelmentation tool of the Standards for Rangeland Health and Guidelines for Grazing Management process. As such, it does not need to be mentioned in the PRMP/FEIS.
The Nature Conservancy	204	24	Is the total complement of land allocations and resource/use decisions that makes up each Alternative- and especially Alternative D- in complicance with all of these Common Management statements for special status species? We did not try to answer this, and it	The decisions under Management Common to All Alternatives or Management Common to All Action Alternatives apply to Alts. B, C, and D. The BLM recognizes its obligations to protect special status species. This protection is a matter of law, regulation and

			would not be possible without thorough cross-checking. This is why we were so persistent and adamant earlier in this letter about the Final RMP serving as the higher-tier authority for requiring that unacceptable adverse effects to special status species do not occur at the finer scales of planning and implementation that are relevant to the occurrences of those species. Or stated more succinctly: Special status species must have primacy over resource uses where the two may conflict, not the other way around.	policy. Nothing in this RMP is intended to abrogate the BLM 's duty to uphold law, regulation and policy.
The Nature Conservancy	204	25	Travel Management (Pg 2-28—2-50) The term “baseline routes” is used within the last of these Management Common points, but no definition of this term appears in the glossary. Are baseline routes all of those that are specifically designated for travel, or some subset of designated routes?	Baseline routes means those routes that are initially established in the Travel Plan accompanying the PRMP/FEIS. All other existing routes that are not designated will be marked "closed" on the ground; travel on these existing routes will cease to be legal at the time of the ROD.
The Nature Conservancy	204	26	Travel Management (Pg 2-28—2-50) The large issue within this point is the distinction and choice between a “closed unless signed as open” and “open unless signed as closed” policy to route identification. Each policy has its pros and cons, though in general we believe that “closed unless signed as open” has greater merit (and fewer signs or posts overall). However, the proposed management, which calls for signing any/all non-baseline routes (whatever they are) as “Closed,” appears to indicate an “Open unless signed as closed” approach. Does this statement effectively apply a comprehensive policy of “open unless signed as closed” regarding route identification across the entire MPA? If so, that fact should perhaps be made more clear in the Final RMP. If not, then we advocate that the MFO choose one approach (we prefer “closed unless signed as open”) and indlude it up-front in the Travel Management section of the Final RMP.	The Moab Field Office will use a combination of signing procedures to ensure on the ground compliance with the Travel Plan. Many very obscure old routes may need no particular signing at all. Open travel routes will be marked on the ground. The ultimate arbiter of a legal route will be the Travel Plan map that will be made available to the public upon the signing of the ROD.
The Nature Conservancy	204	27	Travel Management (Pg 2-28—2-50) Several motorcycle routes that would be designated under Alternatives C and D (DRMP Map 2-11-E) are in the	The BLM is aware of the problems of cross country travel associated with motorbike trails. However, the action in the RMP authorizes only on-trail use of these routes.

			midst of the occurrences of the Stage Station milkvetch (Astragalus sabulosus var. vehiculus). Designation of these routes by the Final RMP would need to be accomplished by vigilant monitoring to avoid adverse impacts (from non-compliant bikers) to this Sensitive plant.	Travel off the designated trails would be illegal and subject to citation. It is hoped that by marking trails on the ground, cross country travel would lessen.
The Nature Conservancy	204	28	Woodlands (Pg 2-55—2-56) Though not specifically mentioned in this section of the DRMP, we assume that cross-country motorized travel off of designated routes would be prohibited for purposes of retrieving and transporting harvested woodland products.	Cross country motorized travel off designated routes is prohibited in the entire field office except for 2,000 acres near the White Wash Sand Dunes. There is no purpose which negates this rule. Neither wood cutting, antler collection, access to dispersed camping or any other purpose is a legal reason to engage in cross country travel in an area where travel is limited to designated routes.
The Nature Conservancy	204	29	Woodlands (Pg 2-55—2-56) As a more technical note, the language used in each of the four Alternatives on DRMP Page 2-56 appears to be confusing. Each one is a single run-on sentence that seems to combine the concepts of provide and prohibit. Although one can figure out which acreage value applies to which concept, it would be best for the Final RMP to use language such as separate sentences so that the distinction between "provide" and "prohibit" is clear and unambiguous.	The language on page 2-56 has been corrected to be more direct.
Sierra Club Utah Chapter	205	1	The section on Travel Management fails to meet the requirements of NEPA, APA, the Information Quality Act (IQA)(also known as the Data Quality Act), and legal requirements for recognizing state or county highway or road claims. The use of state and county road inventories is either beyond the scope of this DRMP or is inadequately analyzed and justified by the DRMP.	See response to comment 205-9.
Sierra Club Utah Chapter	205	2	Section 3.17 and 4.16 are cursory discussions of the impacts of roads on the human environment. The information provided is inadequate to for the agency to make an informed decision about the transportation system. For example Gelbard and Belnap (2003) are	The BLM recognizes that the great majority of impacts to soils were created when the route was initially bladed. The BLM must assume that, in identifying routes for travel, that the public will adhere to the travel management rules, and that the impacts to soils from

			listed as a reference but no where is it shown how this information was used. Considering the import of this research it does not make sense to have the road densities in any of the alternatives. The BLM totally fails to use information contained in their own references.	cross country travel would be lessened. The commentor should realize that the impact analysis compares the action alternatives to the No Action alternative. The impacts to soils from the preferred alternative are demonstrably more positive than those in the No Action alternative, because cross travel motorized travel is virtually eliminated.
Sierra Club Utah Chapter	205	3	The DRMP also fails to consider the effects of an extensive and excessive travel map with regard to other issues such as the extent of ORV use permitted, the development potential for oil and gas, the effects of road dust on biological soil crusts (This is a particularly egregious failure since much of the available research comes from this region.), the effects of grazing on biomass and ground cover, and other permitted activities.	Throughout Chapter 4 of the DRMP/DEIS, the BLM has assessed the impacts of travel management on a wide variety of resources. Nowhere in Chapter 4 does the BLM suggest that the presence of routes and their identification for travel is without environmental impact. The commentor should realize that the impact analysis compares the action alternatives to the No Action alternative. The impacts to resources from the preferred alternative are demonstrably more positive than those in the No Action alternative, because cross travel motorized travel is virtually eliminated. The alternatives explicitly discuss the other issues raised by the commentor, including the extent of OHV use permitted, the development potential for oil and gas, the effects of grazing on biomass and ground cover, and other permitted activities. The commentor does not indicate where the BLM erred in its choice of data, its analytical methods or the conclusions drawn from such analysis. The article cited pertains to the spread of invasive weeds by vehicular travel. The BLM is aware of this. The impacts of "road dust" on biological soils crusts is not documented. Vascular plants may be more susceptible to road dust than biological soil crusts.
Sierra Club Utah Chapter	205	4	The cumulative effects of these interacting activities is completely ignored and denied in 4.3.16.2. This section completely misunderstands the requirement to look at the cumulative impacts of a variety of activities that will be permitted in the decision.	The section of the DRMP/DEIS referred to by the commentor discusses the effects of various resource decisions on travel management, and has nothing to do with cumulative impacts. The DRMP/DEIS discusses cumulative impacts in section 4.3.24. The commentor

				may disagree with the BLM's assessment of cumulative impacts, but offers no specifics as to where or how the BLM erred in its analysis or conclusions.
Sierra Club Utah Chapter	205	5	Because the DRMP makes only cursory, vague and unsupported statements concerning travel management it fails to meet the requirements of NEPA, any decisions resulting from this discussion would be arbitrary and capricious. For this reason it would also fail to meet the requirements of the APA. The DRMP discusses travel management for only 2.5 pages in Sec 3.17. Most of that is only a description of various locations within the Field Office Area. The DRMP discusses travel management for about 8.5 pages in Sec 4.16. Neither section contains substantive discussion of the problems and issues related to travel management. The environmental consequences are not well documented and avoid some crucial issues.	The commentor offers no specifics to support these very general assertions. The commentor seems to be unaware of the extensive discussion of travel plan formulation in Appendix G. The "crucial issues" to which the commentor refers are undefined, making response difficult. An extensive administrative record, available for public inspection, underlies the conclusions reached by the BLM in its formulation of travel plan alternatives.
Sierra Club Utah Chapter	205	6	The consequences to non-mechanized recreation are considered to be the same for Alternatives B, C, and D. How could the road densities proposed for travel management not impact hiking, backpacking and equestrian activities negatively? If there is a difference between the alternatives then they should have different effects on non-motorized recreation. If there is no difference then this is one example of the lack of a reasonable range of alternatives in the DRMP.	The BLM discusses the impacts of travel management on these activities on pages 4-410 to 4-111 in the DRMP/EIS. On these pages, the BLM specifically discusses the different impacts on these activities from the three action alternatives. The commentor assumes that the three action alternatives will impact negatively these activities. This ignores the fact that all three action alternatives greatly reduce (almost to zero) acreage designated open to OHV travel. All three action alternatives identify over 2500 miles of routes currently available for motorized recreation as being restricted to non-motorized activities. The BLM believes that these alternatives will have positive impacts on non-motorized recreation, and this is stated explicitly on page 4-112 of the DRMP/EIS. The BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, 4

				alternatives were identified (including the No Action Alternative) for further analysis. The management prescriptions and actions outlined in these alternatives are not identical as suggested by the comment. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Table 2.1 in the Moab DRMP/EIS provides in comparative form the management actions associated with each alternative.
Sierra Club Utah Chapter	205	7	The creation of non-motorized routes does not mitigate the hiking or backpacking experience if one remains in earshot of motors, if one can see the dust plumes of ATVs, dirt bikes or 4WD vehicles, or see the evidence of off-route travel on most trips into the backcountry? The essence of good planning requires balance. The DRMP lacks any sense of balance between uses. (at 4-411 and 412)	The BLM is not required to guarantee that the adverse impacts suggested by the commentor will never be present in any part of the planning area. Noise regulation of motors is a matter of state law. See response to comment 122-7. See also responses to comments 205-6 and 209-3.
Sierra Club Utah Chapter	205	8	While the DRMP makes a cursory analysis of the effects of vegetation management on travel management it fails to analyze the effects of travel management on vegetation.	Section 4.3.17.13 “Impacts of Travel Management Decisions on Vegetation Resources” contains the analysis the commentor asserts is not present in the DRMP/EIS.
Sierra Club Utah Chapter	205	9	The DRMP states: “Utah State road classes were considered in the impacts analysis. The road classification relevant to the analysis was the Utah Department of Transportation Class-D roads. These are unpaved roads, and not regularly maintained nor funded for maintenance by the state. Most of the routes within the MPA are in this road class (see Travel Plan, Appendix G). Utah Class-B roads are also proposed as designated routes under the Travel Management prescriptions (see Chapter 2 Summary Table of Alternatives); however, these routes were not used as analysis criteria because they are maintained San Juan County and Grand County roads that currently provide motorized access throughout the MPA and whose travel function or designation would not change under any of	The BLM solicited route information from all interested parties as part of its scoping process, leading to formulating travel plan alternatives. The BLM received route information from both public bodies (such as the Counties) and private citizens. The commentor seems to believe that using this route information as a basis for travel planning is designed to validate RS 2477 claims, which is not the case. If this were the case, the BLM presumably would have included all County route inventories in all its action alternatives; instead, the BLM did not identify for motorized use more than 2500 miles of inventoried routes in its preferred alternative. The assertion that the DRMP/EIS recognizes state and county road claims for planning purposes is incorrect. The BLM accepts county route inventory data (as well as data from

			the proposed alternatives." (At 4-405) BLM cannot use these because: 1) The use of Utah State, Grand County and San Juan County road maps for purposes of planning is illegal. The county B and D roads are essentially equivalent to the county R.S. 2477 claims. The BLM attempts to dodge this by saying the plan will not make a decision regarding the validity of R.S.2477 claims. It does use the equivalent data in a planning decision. The BLM appears to be making a differentiation where there is none to be found. The BLM is attempting to establish a policy that would permit them to make non-binding determinations of R.S. 2477 claims for planning purposes. This concept has yet to pass legal challenge. In essence the DRMP recognizes state and county road claims for planning purposes. In this way it exceeds any permissible or possibly permissible rule or policy. This process is far beyond even the limited decision making process conceived in the non-binding determination process outlined by the BLM. The DRMP gives credence to R.S. 2477 claims since these are largely if not entirely equivalent to state and county road claims. It is entirely likely that the use of this information in planning violates the intent of Congress. Congress prohibited the recognition of any R.S. 2477 rights of way. The language of the relevant statutory provision first appeared as substitute language to Senate Bill 1425, 104th Cong. "Revised Statutes 2477 Rights-of-Way Settlement Act." See S. Rep. 104-261 at 1. As the Senate later explained, "As originally written S. 1425 provided a process by which RS 2477 rights-of-	others) as the first step in its travel plan formulation. As stated in Appendix G of the DRMP/EIS, the BLM then evaluates purpose and need of verified (not simply inventoried) routes against resource conflicts, spreading these analyses across alternatives. See also response to comment 124-138. The commentor assumes that the BLM accepted route data from the counties and other parties without qualification. In fact, as explained in detail in Appendix G, the BLM used scientifically defensible sampling techniques to verify the route data presented. The commentor does not provide a single instance of the BLM including in its database or in any of its alternatives a route which actually does not exist on the ground. The commentor asserts that the county and state-provided data is "unlikely" to be accurate or unreliable, yet provides no evidence to support this assertion. "B" and "D" routes do not equate to County road assertions. At some point in the future, the Counties may assert claims to any or all of these routes; conversely, they may choose not to assert claims to any or all of these routes. The routes identified as "B" and "D" routes in the DRMP/EIS are routes located on public lands and managed by the BLM until properly adjudicated. The DRMP/EIS proposes four different alternatives to manage these routes. As specified in the Draft RMP/EIS (pg. 1-12), addressing RS 2477 assertions is beyond the scope of this planning effort. However, nothing extinguishes any right-of-way or alters in any way the legal rights the State and Counties have to assert and protect RS 2477 rights. The commentor is insistent on the assertion that using county or state-provided route data as part of the input into the BLM's travel planning formulation effectively confirms RS

			way could be validated by means other than a quiet title action in the courts. Because of controversy over the legislation the Full Committee on May 1, 1996 passed a substitute amendment by voice vote. The substitute amendment placed a permanent moratorium on any agency of the federal government from issuing final regulations on RS 2477 without Congressional approval." While the RMP may not appear to be a final regulation, by using and recognizing state and county road claims it is making a decision that will be difficult to change in the future. The state of Utah and the counties continue to have recourse to the courts to assert road claims. In fact this is still the only route by which the counties can assert and have adjudicated road claims. 2) Using the state and county road claims also violates the IQA. The IQA (sometimes referred to as the "Data Quality Act") was meant to ensure that agencies, including the BLM, did not disseminate to the public or rely on information of dubious quality in the agency's public pronouncements or decision-making. The DOI and BLM guidelines make clear that when the agency makes a decision, the IQA's guidelines would apply to that decision and dissemination of information allegedly supporting that decision. DOI guidelines at 3; BLM guidelines at 4. DOI guidelines state that to ensure the "quality" of information the agency relies upon or disseminates, the agency must ensure that the information is "accurate, reliable, and unbiased," and is "presented in an accurate, clear, complete, andunbiased manner." DOI guidelines at 8; see also BLM guidelines at 6. Where the information at stake is "influential," the agency must more rigorously evaluate	2477 claims is unfounded, no matter how often the commentor makes this assertion. The commentor repeatedly confuses route "data" with route "claims"; the BLM only considered route data in its travel plan formulation. The maps referred to by the commentor are not maps of county "claims", but maps of verified routes which form the baseline (not the final product) for travel planning.

			the information to ensure itsintegrity. DOI guidelines at 10; BLM guidelines at 4-5. DOI defines “influential information” to include that data that will have a “clear and substantial impact on important public policies.” DOI guidelines at 10; see also BLM guidelines at 4 (influential information is that which is “expected to have a genuinely clear and substantial impact at the national level”). IQA guidelines make clear that BLM must ensure the objectivity of information providedto the agency by third parties that may form the basis for the agency’s decision. DOI’s guidelines state that if DOI “relies upon technical [or other] information submitted or developed by a third party, that information is subject to the appropriate standards of objectivity and utility” under the IQA. The BLM fails to provide any reason for including the state and county road claims on the travel maps in the DRMP. It fails to indicate that the information is accurate, reliable and unbiased. Since the state and counties in Utah have repeatedly made adverse claims for roads against the United States it is entirely unlikely that the information provided would be unbiased. So far nearly all such claims have also failed to be adjudicated in favor of the counties or state. It is unlikely the information provided by the state or counties is accurate and reliable. Anyone looking at the travel maps would easily determine many of the routes are old seismic exploration scars and not roads or highways. They were not constructed for transportation purposes. The Moab Field Office does not have the legal authority to determine the accuracy, reliability or unbiased nature of state or county road claims. It cannot fulfill the requirements of the IQA by using data from the state or	

			counties. 3) The DRMP does not make it clear under what authority the state and county road claims were constructed (if they actually did construct them). Prior to the passage of FLPMA 1976 the roads could have been constructed under the authority of R.S. 2477. The BLM should research its records for adjudicated R.S. 2477 ROWs in the Field Office area to verify the accuracy and reliability of the state and county road maps. This also makes evident the conflict in using the state and county road claims in any planning process with intent of Congress. Are the maps and road claims submitted by the state and counties consistent with Utah State law? Did the state or counties verify that the claims they submitted have been compared to the require plats of roads and highways as they existed in 1976 (or 1966 because of another requirement of Utah law)? The 1977 Grand County Road Maps [see attached] show a very different set of roads claimed by the county. The three figures below show portions of Grand County Road Maps. We can make the full maps of Grand County available to the BLM if the Moab FO does not already have them. You will note that one map shows the Utah Department of Transportation did not verify the accuracy of the maps. This would indicate that at least one agency responsible for the maps cannot assert the accuracy or reliability of these maps. Yet this is what was available in 1976 when FLPMA repealed R.S. 2477. Since these maps vary tremendously from the travel maps in the DRMP the BLM would need to verify the authority under which new roads could be claimed. The BLM once	

			again needs to verify roads claimed through adjudicated R.S. 2477 ROW claims or through records showing ROWs granted under Title V of FLPMA. Without either R.S.2477 or Title V authority the state and county road maps cannot be accurate, reliable or unbiased. If the Moab Field Office is asserting these road claims are valid then it is acting contrary to the direction of Congress. If it is asserting these road claims are valid under FLPMA then it should be able to show the Title V authority for these claims. Again the nature of accepting these claims reaches far beyond any procedure the BLM has conceived for making even non-binding determinations. Either the BLM is acknowledging R.S. 2477 ROW claims or it is recognizing Title V ROW claims. Neither of these are permissible with the information given in the RMP. Both would be illegal under the information given. Recommendation: Since Travel Management and Travel Maps are an integral part of almost all aspects of management to be determined by the RMP revision most of the DRMP will require significant revision. The BLM should withdraw the DRMP and begin a truly collaborative process for creating a balanced Resource Management. The integral and complex issues that relate to travel management must be explored. The relationship of roads and other mechanized routes to weeds, wildlife, cultural sites, wilderness, landscapes resilient to global and local climate change, and host of other issues must be analyzed. Travel management cannot be adequately analyzed in a few pages especially considering the limited and	

			illegal range of materials used for analysis. The entire Transportation Management Section should be withdrawn. The Travel Management maps should be discarded. Because travel management is integral to all aspects of the RMP the DRMP should be re-written. Because of the heavy dependence on information that the Moab Field Office cannot use for planning purposes a team of BLM staff from offices outside of the State of Utah may be needed to supervise the development of a new DRMP. The taint of the illegal use of state and county road claims would likely prejudice the outcome of a new DRMP if local field office staff continues to supervise the development of a new Resource Management Plan.	
Sierra Club Utah Chapter	205	10	The Moab Field Office should be considering actions to take in the face of climate change. While the MFO should do its part to reduce impacts to global climate change that is not the focus the BLM take in its resource management plan. The MFO manages approximately1,859,000 acres. Climate change will affect these acres. The BLM must plan to keep the lands healthy and resilient in the face of climate change.	See response to comment 124-115.
Sierra Club Utah Chapter	205	11	Dust arriving in Colorado from Utah is altering snow pack in the Rocky Mountains. This in turn will influence the amount of water in the Colorado River and the availability of water to millions of people.	See responses to comments 124-115 and 205-13.
Sierra Club Utah Chapter	205	12	Grazing will need to be managed in a much more ecologically sound manner in light of climate change that detrimental effects of less resilient landscape. *See attached photographs of White Wash, indicating erosion from grazing.* Jerry Holechek and others noted, "The authors' research and experience across a variety of landscapes, ranches, and countries shows a 25% harvest coefficient is the surest way to avoid chronic forage deficits and land degradation." (Galt, Dee,	See responses to comments 124-115, 205-14, 9-3 and 205-13.

			Francisco Molinar, Joe Navarro, Jamus Joseph, and Jerry Holecheck, Grazing capacity and stocking rate. Rangelands, Dec. 2000, 7-11. This is a reference the BLM range conservation staff should already have on hand. If not we will track down a copy for you. The current utilization in the area of the photographs is probably 100% since there were no desirable forage plants visible. There is little chance that land degradation will not continue to occur.	
Sierra Club Utah Chapter	205	13	This must be added to the cumulative effects of vehicles. Six photographs show vehicles on the road. The vehicles traveled past me from 5:35 PM to 6:46 PM. Note the dust from each vehicle. Several of the vehicles towed trailers loaded with ATVs. It is likely the ATVs were creating dust for several hours prior to this. Along side I-70 were a series of colored bags. They appear to be related to a series of geophones (but this is only a guess). Over the last few weeks a vehicular way has become increasing pronounced with loose soil and diminishing vegetation. Again this activity needs to looked in its cumulative effects with grazing and other motorized uses.	The impacts of travel management decisions on soils are discussed on pages 4-292 through 4-296 of the DRMP/EIS. The impacts of air quality decisions (including dust) are discussed in section 4.3.16.2.1 of the DRMP/EIS. See also response to comment 202-8. The geophone-related activity to which the commentor refers was likely from a recent seismic exploration project along I-70. The BLM did a full environmental analysis of this activity on site-specific basis, and will continue to do the same level of analysis (including cumulative impacts) on a site-specific basis. The BLM has estimated the impact of geophysical exploration activities on pages 4-286 through 4-291 of the DRMP/EIS. See also response to comment 205-4.
Sierra Club Utah Chapter	205	14	Large reference areas of 100 to 1000 acres should be created to assess the effects of grazing and motorized recreation on the productivity of the land. The reference areas should be large enough to allow a wide range of plants to grow in the absence of human disturbances. Only this will give the BLM a means to measure the result of management. The reference areas should be those least impacted by human or human related activities and preferably to have had no impacts for 10 years. If such areas cannot be found then specific sites should be identified and set aside as future reference areas. Grazing utilization should be closely monitored. Cattle should be removed when utilization exceeds	Monitoring of grazing activities are discussed on pages 4-70 and 4-82 of the DRMP/DEIS. Monitoring of motorized activities are discussed on pages 4-231 and 4-235 of the DRMP/DEIS. Monitoring specifics are implementation issues, and outside the scope of the planning process. The specific suggestions of the commentor are not supported by any accompanying documentation to suggest that this monitoring regime is the appropriate one for the BLM to follow. The BLM relies on Standards and Guidelines for Rangeland Health to monitor the impacts of grazing on a variety of resources, and will continue to do so under the new plan. See response to comments 9-3

			25%. The BLM should be investigating climate change and its relationship to management needs. The Forest Service has several projects. Once can be found at http://www.fs.fed.us/psw/cirmount/. An equivalent program is essential particularly in the largely arid environments managed by the BLM in the intermountain west.	and 209-49.
Sierra Club Utah Chapter	205	15	Consider two sources re: effects of grazing: 1 – (Crider, F.J. 1955. Root-growth stoppage resulting from defoliation of grass. Washington, DC: USDA Forest Service, Tech. Bull. No. 1102.) We are supplying a copy of this seminal research on an accompanying CD. Crider's research is important because it indicates that grazing pressure will tend to favor fast-growing annuals (such as cheat grass) over perennial native grasses. Continued pressure from grazing will continue to result in diminished populations of perennial native grasses. 2 – When this is considered in the light of research conducted at the Idaho National Laboratory grazing becomes the single most effective mechanism to increase cheat grass. Below is a summary of the findings of Anderson and Inouye (Anderson, Jay, and Richard Inouye. 2001. Landscape-scale changes in plant species abundance and biodiversity of a sagebrush steppe over 45 years. Ecological Monographs 71(4):531-556.) We are supplying a copy of this research on an accompanying CD. Note pages 545-553, which show importance of native species, species richness, and which conclude increases in species diversity are due to drought recovery 1950-1975, not due to use of grazing. This study does not support opinion that removal of grazing would decrease species diversity. (Laycock 1994 Study).	The land use planning decision regarding grazing is only whether or not a particular allotment is available or unavailable for grazing during a particular planning cycle. All specific decisions on grazing are made at the allotment level, using the Standards for Rangeland Health and Guidelines for Grazing Management (see Appendix Q). See response to comment 9-3.

Sierra Club Utah Chapter	205	16	In Sec. 3.7.1.2 Riparian areas, 45% of riparian areas are functioning at risk or not functioning. Standards and Guidelines for Rangeland Health have been in effect since 1996. It is unconscionable that any riparian area not in functioning condition should remain available for grazing in a decision to be made more than ten years later.	As individual allotments are reevaluated using the Standards for Rangeland Health and Guidelines for Grazing Management, decisions about specific riparian areas will be made. See response to comment 9-3.
Sierra Club Utah Chapter	205	17	In Sec. 4.3.6 Livestock Grazing, Among other things this section states: " In the short term, actual forage use in the decision area may increase due to improving range condition and range recovery from recent drought. Over the long-term, forage demand may continue at historic levels." This is a strange statement since NOAA still lists the entire region as being in moderate drought or abnormally dry. The MFO area is not recovering from recent drought. The seasonal outlook also predicts drought will persist or increase in the area.	Decisions about actual range conditions and season of use are made on an allotment basis using Standards for Rangeland Health and Guidelines for Grazing Management. See response to comment 9-3.
Sierra Club Utah Chapter	205	18	Sec. 4.3.6.1 Impacts Common to All Alternatives Much of this section is typical of the all sections on analyzing the impacts of grazing and the response of the BLM to problems with grazing as they arise. There are consistently vague remedies to problems that are put off into the future. This is exemplified by statements like these: •Grazing practices would be modified if a grazing allotment fails to meet any of the BLM's UtahStandards for Rangeland Health… • Data collected from rangeland monitoring studies would assist the Field Manager… • Under all alternatives, certain allotments could undergo season-of-use changes to facilitate grazing management… No clear direction is given for resolving problems. Everything is put off to future decisions. The DRMP lacks direction or substance for grazing management. There are many activities that “could” change grazing	See response to comment 9-3.

			management but no direction is given for when, how, or what changes will be made.	
Sierra Club Utah Chapter	205	19	Table 4.32 lists five riparian areas that would be unavailable for grazing under Alternative C. Are these all of the 45% of riparian areas that are not meeting Rangeland Standards and Guidelines? Where are those areas analyzed in the DRMP? How is the MFO going to deal with these poorly functioning riparian areas?	These are not the 45% of riparian areas that are not in Proper Functioning Condition. It should be remembered that lack of Proper Functioning Condition can be due to reasons other than grazing. All riparian areas will be considered during the permit renewal process, at which time Standards for Rangeland Health and Guidelines for Grazing Management are applied. See response to comment 9-3.
Sierra Club Utah Chapter	205	20	One of the stranger statements in the DRMP comes under the analysis of Alternative C. In subsection 4.3.4.7 the DRMP states, “Change in livestock class from sheep to cattle, fencing, seeding and rest/rotation to improve habitat would be encouraged.” Is the BLM planning to “encourage” itself to make changes? The BLM has the authority to make many changes including most of these. Can the best it do is “encourage” itself to make changes? This seems indicative of the tenor of all the cursory analysis of problems. No decisions are made, all changes are put off to the future, and the BLM will encourage itself to change management. This is beyond belief.	The actions referred to by the commentor are those that would be considered during the permit renewal process, using Standards for Rangeland Health and Guidelines for Grazing Management. By placing these actions in the DRMP/EIS, the BLM commits to consider them during that process.
Sierra Club Utah Chapter	205	22	The entire section on grazing needs to be given some actual management direction. It should not depend so heavily on the 1985 RMP or the 1991 BLM Vegetation Treat FEIS. These are both old and no longer relevant to current conditions or knowledge about grazing and the impacts of grazing. In particular they cannot help the BLM plan for the cumulative effects of grazing on a landscape impacted by climate change or help the BLM determine the adverse effects of grazing as climate change occurs.	See response to comment 9-3. The Vegetation Treatment EIS has been updated since the DRMP/EIS was released to the public. The new document, "Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in Seventeen Western States" (2007) has been utilized in the PRMP/FEIS.
Sierra Club Utah Chapter	205	23	Also look at the recent 27 photographs on the Little Grand Allotment. Do the photographs reflect proper grazing management? Is the forage utilization	The land use planning document makes decisions only on whether or not an allotment is available or unavailable for grazing. See response to comment 9-3. Each allotment

			appropriate according the standards? If not how would the DRMP guide the correction of the problems? *see attached CD*	would be analyzed on a site specific basis at the renewal stage using Standards for Rangeland Health and Guidelines for Grazing Management.
Sierra Club Utah Chapter	205	24	The Moab Field Office should initiate a round of forage capacity analyses including clipping studies, reviewing trend data to see if plant cover, variety, and biomass have changed over the years. We would recommend the MFO recover the SVIM studies conducted by the BLM back in the 1970s as a baseline for comparisons. (We would be glad to provide the information if you no longer have it.) Reference areas should be created as noted above. The current areas and proposed areas for removal of livestock will not completely meet the need. They may be adequate as references for some areas but not all. And many have other human impacts that would make their value for evaluating grazing minimal. Areas removed from grazing should have a monitoring system created so that what little information that can be gleaned from these areas can be used for comparison purposed with similar areas that continue to be grazed.	See response to comment 9-3. The type of studies referred to by the commentor are done at the permit renewal stage.
Sierra Club Utah Chapter	205	25	The Redrock Heritage Plan should have been taken seriously and incorporated into the DEIS. The BLM should have worked with the proponents rather than reject the plan outright.	Many of the commentor's earlier remarks criticize the BLM for failing to take into account the numerous alleged negative environmental impacts from the BLM's travel plan. In this comment, however, the commentor criticizes the BLM for not incorporating the Redrock Heritage Plan into the DRMP/EIS. It is worth noting that this plan has more miles of motorized routes than any of the BLM's action alternatives, and would presumably create even greater negative environmental impacts of the type feared by the commentor.
Red Rock 4-Wheelers, Inc.	206	1	The Club supports Travel Management Alternative C, the preferred alternative, with a few changes that are detailed in the following section. 1. Parts of roads used on five permitted Jeep Safari routes are missing from your Alternative C designated road map. I think this issue needs to be addressed	See responses to comments 206-3, 206-10 through 21.

			before finalizing the plan. Details are provided in Appendix A. 2. There are a couple road segments in existing WSAs that I think could be reopened without impairing the suitability of the area for preservation. In one instance Search and Rescue efforts would be enhanced by this action. Details are provided in Appendix B. 3. The connection of the Klondike Bluffs Road from US 191 to the northern section of the Little Valley Road, as well as the connection at this point of the southern and northern sections of the Little Valley Roads, is missing from the maps. This is a part of the Copper Ridge Safari route and mentioned in Appendix A, but I imagine a lot of mountain bikers will be upset to lose this access to the parking area for Klondike Bluffs as well. 4. A few routes shown on Alternative A in red, indicating they will be kept on the system in Alternatives C or D, do not appear on Alternative C. Three examples of this are included in Appendix C that are important to me, and I urge that they be added to the Alternative C map. 5. There are some road segments that are not Jeep Safari trails, but we feel they are important enough to note and ask for revisions on Alternative C to add them. These are covered in Appendix D.	
Red Rock 4-Wheelers, Inc.	206	2	Some boundary adjustments to allow for a better recreational experience and more understandable enforcement are needed for the White Wash Sand Dunes Open OHV Focus Area, a part of the Labyrinth Rims/Gemini Bridges SRMA.	See response to comment 123-35 relating to enlarging White Wash Sand Dunes open area in Alt C of the Travel Plan for the DRMP/EIS. See also response to comment 120-83 concerning enlarging the White Wash area to accommodate dispersed camping.
Red Rock 4-Wheelers, Inc.	206	3	The Club urges the BLM to consider establishing another SRMA in the Yellow Cat area north and east of Arches NP as this is an area of growing interest and spectacular beauty along the park fringes.	See response to comment 122-38.
Red Rock 4-Wheelers, Inc.	206	4	All SRMAs should have language included to provide a mechanism for future new routes and route connections	The DRMP/EIS specifically allows for the addition of routes to the Travel Plan. The document states on p. 2-

			as conditions warrant or recreational needs change. This would add additional flexibility to the management of these areas.	48 that the Travel Plan “may be modified through subsequent implementation planning and project planning on a case-by-case basis”.
Red Rock 4-Wheelers, Inc.	206	5	We recommend careful wording in the naming and signage for SRMAs, particularly the Focus Areas. Users need to know when other types of use are allowed in an area, even though an area is primarily focused for recreational enhancement of one group. An example would be the Copper Ridge unit. A 4x4 road will exist in the area, yet the main focus is mountain bikes. The Sovereign area (non BLM) is an example of an area being designed for single track use, motorized and mechanized, however, mechanized riders have been encountered that expect exclusive use when on the trails. The Club believes careful wording and trailhead signage can reduce this problem, as well as working with local businesses to stress the importance of providing this same information to their customers.	A land use planning decision is not necessary for the BLM to undertake actions regarding signage and education. This is specifically addressed in Chapter 1 of the DRMP/EIS (pg. 1-11), where "education, enforcement/prosecution, vandalism and volunteer coordination are listed as issues that are addressed through policy or administrative actions.
Red Rock 4-Wheelers, Inc.	206	6	We think that identification of Non-WSA lands with Wilderness Characteristics was outside the scope of analysis for an RMP. The time has long since passed that for WSA analysis, a point recent decisions in lawsuits concerning this matter reinforce. These areas should not have been isolated for special management, and therefore 0 acres should be selected under this heading, just like in Alternative A. Existing management would appear to be adequate if they were selected as areas of naturalness, solitude, and areas for primitive and unconfined recreation. Keep up the good work and manage them as you do now.	See response to comment 121-10.
Red Rock 4-Wheelers, Inc.	206	7	Special Recreation Permit (SRP) policy should remain at the 50 vehicle level to require a permit. The 25 vehicle requirement proposal under Alternative C is too low.	See response to comment 123-26.
Red Rock 4-Wheelers, Inc.	206	8	Another problem area is the individual SRP policy proposed for the White Wash Sand Dunes Area focus area. This would appear to be inconsistent with the	See response to comment 123-10.

			Federal Land Recreation Enhancement Act (FLREA), wherein the public is supposed to be involved in the decision making process for charging fees. It would appear the best choice would be to omit this from the RMP and deal with the fee system through the existing Resource Advisory Council.	
Red Rock 4-Wheelers, Inc.	206	9	The Club is aware of some aspects of the Ride With Respect Group's proposal. The RR4WD Club would like to be involved in the decision making process concerning their proposal, but what we have seen is well thought out and easy to implement. Specifically this refers to ideas about: 1) utilizing existing roads in the Cisco Desert and Copper Ridge area to provide a motorcycle route from Fruita to Moab and 2) expansion of the proposed South Moab SRMA to include Black Ridge, and then establishing focus areas within the expanded area to deal with mountain bikes, equestrians, trials motorcycles, and rockcrawlers.	Alternative C of the Travel Plan in the DRMP/EIS provides a motorized motorcycle route relying primarily on existing routes from the Colorado border to Thompson. See response to comment 122-36 regarding Copper Ridge. See also response to comment 122-43 regarding the Black Ridge area.
Red Rock 4-Wheelers, Inc.	206	10	The only adjustments to the South Moab SRMA, proposed by Ride with respect, that seem to be required appear to be the inclusion of the segments of the Strike Ravine Jeep Safari trail mentioned in Appendix A, but the Club wants to stress its desire to be involved with the planning of this proposal, if accepted by the BLM.	See response to comment 206-11.
Red Rock 4-Wheelers, Inc.	206	11	There are a number of permitted Jeep Safari routes not included in Alternative C, and these should be added to this Alternative. These include segments of the Copper Ridge, Strike Ravine, 3D, Dolores Triangle, and Flat Iron Mesa routes.	The short segments on BLM are mapping errors which have been corrected (route numbers 13637, 15331, 15332, 15334, 15336). Strike Ravine and Flat Iron Mesa routes will need to be hand digitized, since they are not part of current Travel Plan database. Several of the segments are exclusively on State lands, and beyond the scope of the Travel Plan formulation.
Red Rock 4-Wheelers, Inc.	206	12	There has been some discussion among Copper Ridge trail leaders as to two modifications to the trail that would allow shortening it yet retaining the trail's character. These changes would require two road segments to be left in Alternative C that are eliminated	One of the two segments is on State land, and beyond the scope of Travel Plan formulation. The other route was identified in the baseline route inventory. The BLM requested information on routes from

			from Alternative A. While there is no plan at present to ask for any changes to the Jeep Safari Permit, it would be desirable to keep these roads legal for future incorporation into the permit.	the public for potential inclusion in the travel planning process. No information was received regarding this route (segment numbers 15605, 15606, and 15623). An interdisciplinary team, which included County road officials, determined that this route lacked purpose and need. Once a route was determined to lack purpose and need, it was not weighed against potential resource conflicts and was not included in any of the action alternatives. For a discussion on the process for adding or subtracting routes to the Travel Plan on a site specific basis subsequent to adoption of the Moab RMP, see response to comment 122-15.
Red Rock 4-Wheelers, Inc.	206	13	(Additional Roads Need Adjustment) Day Canyon Point-A side spur from the main road that heads west to an overlook of Long Canyon does not show the route's full length. It proceeds beyond what is shown to cross a small wash and end at a turnaround point. This serves as both a natural turnaround point as well as a nice starting point for a hike to overlooks of Long Canyon and the interesting rock formations along the rim in this area, it adds only about 1/8 mile. It begins at UTM 4268370N 0614600E and ends about 4267570N 0614830E. (See map)	This route is not part of the baseline route inventory utilized for formulating the alternatives for the Travel Plan in the DRMP/EIS. The BLM requested information on routes from the public for potential inclusion in the travel planning process. No information was received regarding this route. As a result, this route was not analyzed. For a discussion on the process for adding or subtracting routes to the Travel Plan on a site specific basis subsequent to adoption of the Moab RMP, see response to comment 122-15.
Red Rock 4-Wheelers, Inc.	206	14	(Additional Roads Need Adjustment) Gemini Bridges-The club would like to see the road across the top of the bridges remain open. (See map)	The route in question was found to have a conflict with other recreational uses, as well as safety issues, that the BLM's interdisciplinary team concluded outweighed the purpose and need for this route.
Red Rock 4-Wheelers, Inc.	206	15	(Additional Roads Need Adjustment) Mill Canyon-A road that connects from the Mill Canyon Road on the north heads southward into Courthouse Pasture, connecting with roads there. It would also seem to be an important road for Search and Rescue	This route was identified in the baseline route inventory . The BLM requested information on routes from the public for potential inclusion in the travel planning process. No information was received regarding this route (segment number 27493 and 31779). An

			efforts in the pasture area. (See map)	interdisciplinary team, which included County road officials, determined that this route lacked purpose and need. Once a route was determined to lack purpose and need. For a discussion on the process for adding or subtracting routes to the Travel Plan on a site specific basis subsequent to adoption of the Moab RMP, see response to comment 122-15. The Federal regulations at 43 CFR 8340 state that any fire, military, emergency, or law enforcement vehicle when used for emergency purposes is exempted from OHV decisions. This is state on G-15 of the DRMP/EIS.
Red Rock 4-Wheelers, Inc.	206	16	(Additional Roads Need Adjustment) The Pickle-This challenging wash bottom route appears to be shown on the Alternative C map, but we want to be sure. It begins at the Bartlett Wash Road about UTM 4285183N 0605027E and heads up the wash to intersect the road to Hidden Valley about 4284925N 0604272E. (See map)	This route has been identified for motorized use in Alt C for the Travel Plan of the DRMP/EIS.
Red Rock 4-Wheelers, Inc.	206	17	(Additional Roads Need Adjustment) Flat Iron Mesa- A strong, useful connecting road that is shown on USGS maps exists between UTM 4245328N 0634685E (the main Flat Iron Road) and UTM 4245272N 0636835E (US191). This road connects with one shown on Alternative C, making that a connecting road rather than a dead end as currently mapped. (See map)	This route was evaluated by the BLM's interdisciplinary team, which included County road officials, as part of its travel plan formulation. Resource conflicts, particularly cultural, were found to outweigh purpose and need. The route is identified for motorized use in Alternative D of the Travel Plan for the DRMP/EIS.
Red Rock 4-Wheelers, Inc.	206	18	(Additional Roads Need Adjustment) Ray Mesa & Lisbon Gap 15' Quad Area-There are some roads along the Utah/Colorado border that leave Utah and continue in Colorado. The roads referred to are in the Ray Mesa and Island Mesa area. A check with the Colorado BLM affirmed that these roads were part of their existing legal travel routes (Julie Jackson, Uncompahgre Office, Nov. 13, 2007). Therefore, it makes no sense to eliminate the Utah end of a road if the	Although depicted on the USGS topographical maps, these routes were not identified by San Juan County in its route inventory, nor were these routes brought forward by the public during scoping period for the land use planning process. See responses to comments 206-4 and 206-13. The area mentioned by the commentor in Colorado lies in an area open to cross-country OHV travel, meaning that all BLM lands in that part of the state are open to travel, regardless of whether it is on-road or off-road.

			Colorado end is legally open to travel, particularly when the Utah end is needed to access the Colorado section. The first road departs from a road shown on alternative C at UTM 4234752N 0669852E to head northeast, it wanders back and forth across the state border around UTM 4235280N 0670139E, and then continues northeast to intersect with another road in the Yip Yip Mine vicinity. The next road also departs from the same road shown on alternative C that was referred to above, about UTM 4233247N 0669563E. It travels generally eastward, crossing the state line at UTM 4233513N 0670416E as it travels along the southern end of Ray Mesa. The final road departs from the above mentioned alternative C road at UTM 4227870N 0670144E and heads eastward toward the Colorado line. Just before reaching the state line it heads north, and finally crosses the border about UTM 4227870N 0671005E as it continues eastward along a bench of Island Mesa. (See map)	
Red Rock 4-Wheelers, Inc.	206	19	(Additional Roads Need Adjustment) Tenmile Wash-An access road into Tenmile from the south is important. It serves as the only access from the rim viewpoints on this side of the wash into the wash itself. It is a well defined road that is only partially shown on the Alternative A map. It starts at the BLM fence line on the western side of the fence at UTM 4285890N 0589660E, roughly parallels the fence for a bit before heading slightly away from it. The Alternative A map terminates it at an ancient playa, but in fact it descends from there on a well defined mechanically constructed road, crosses the small wash to proceed down the other side, through a gate in a fence, and then proceed pretty directly to a descent down the last little bit into Tenmile at about UTM 4287670N 0588320E. (See map)	See response to comment 206-13.
Red Rock 4-Wheelers, Inc.	206	20	Two short routes in Wilderness Study Areas (WSA) should be identified for motorized use in Alternative C.	The spur to Egg Ranch Fin is located in an area closed to motorized use as part of the 1985 Grand Resource Area

			These are spurs to Egg Ranch Fin in the Behind the Rocks WSA, and a spur west from Coffee Pot Rock in the Negro Bill Canyon WSA.	RMP, in order to enhance primitive recreation opportunities. It is situated in an area closed to motorized travel across all alternatives in the DRMP/EIS. It was not part of the route inventory submitted to BLM during the scoping period for the land use planning process. The spur west from Coffee Pot rock is identified for motorized use in Alternative D. This route was not identified for motorized use in Alternative C, due to the BLM's conclusion that resource conflicts, particularly wilderness, outweighed purpose and need.
Red Rock 4-Wheelers, Inc.	206	21	There are several roads missing from the Alternative A map that should be included in Alternative C. These include (1) two spurs to overlooks on Dry Mesa and an extension of the main road on its eastern end; (2) a road to an overlook in the Tenmile area; and (3) two overlook roads in the Rainbow Rocks area.	The routes in question on Dry Mesa are identified for motorized use in Alternative D of the Travel Plan for the DRMP/EIS. They are not identified in Alt C due to resource conflicts, particularly wildlife, which the BLM concluded outweighed purpose and need. These segments are 27532, 27569, 27611, 27644, 27631, 27322, 20323, 27333, 27346, and 27461. The road to the overlook in the Tenmile area (number 27272) is identified for motorized use in Alternative D, but not in Alts B or C due to conflicts with wildlife and soils resources. The two overlook roads in the Rainbow Rocks area (numbers 27285, 27460, 27430, 27422, 27394) are identified for motorized use in Alt D only due to wildlife conflicts.
Red Rock 4-Wheelers, Inc.	206	22	(Additional Roads Need Adjustment) Tenmile Wash-An access road into Tenmile from the south is important. It serves as the only access from the rim viewpoints on this side of the wash into the wash itself. It is a well defined road that is only partially shown on the Alternative A map. It starts at the BLM fence line on the western side of the fence at UTM 4285890N 0589660E, roughly parallels the fence for a bit before heading slightly away from it. The Alternative A map terminates it at an ancient playa, but in fact it descends from there on a well defined mechanically constructed road, crosses the small wash to proceed down the other side, through a gate in a	See response to comment 206-13.

			fence, and then proceed pretty directly to a descent down the last little bit into Tenmile at about UTM 4287670N 0588320E. (See map)	
San Juan Trail Riders	207	1	…we support the area and route designations proposed by Ride with Respect, nonprofit.	See response to comments 122-1 to 122-49.
San Juan Trail Riders	207	2	The plan should more explicitly state that conflict is exacerbated by overcrowding. Additionally, the plan should better address the scope of conflicts. They occur at society, group, and individual levels. They occur between management, user groups, and within user groups. Although conflicts generally begin asymmetrically, the direction is not always consistent. Finally, the plan should acknowledge that conflicts become symmetrical when management actions unduly restrict the more dominant uses.	The BLM's responsibility is to address recreation conflicts that occur on BLM lands, and to allocate among varying types of recreation users. The general nature of societal conflicts is not a land use planning issue.
San Juan Trail Riders	207	3	We are pleased to read Table 2.1 Recreation (page 2-17), which plans to provide visitor information and outreach programs that foster a land ethic. For planning, We suggest highlighting one more critical item. Noise is the most common complaint against Off Highway Vehicles. Thus for all vehicles across the entire field office we recommend implementing and enforcing a 96-decibel limit based on the “20-inch” test (SAE J1287).	See response to comment 122-7.
San Juan Trail Riders	207	4	Sections 3.11.1.2.16 and 3.17.2 (pages 3-79 and 3-158) estimate road mileage based on county inventories. They mention that “motorcycle routes” exist around White Wash. The document should specify that this includes motorcycle single track and ATV trails. Additionally, off-highway vehicle trails exist in high concentration from “ Utah Rims” to Cottonwood Wash. Isolated OHV routes exist throughout the Moab field office, such as the Thompson Trail. Mountain bike trails also exist beyond those mapped in Alternative D.	See response to comment 122-10.
San Juan Trail Riders	207	5	In the Moab field office, non-road mountain bike, motorcycle, and ATV trails were never inventoried. The	See response to comment 122-14.

			only exceptions are roughly 15 square-miles around Bitter Creek and 100 square-miles around White Wash, which together comprise less than 5% of the field office. Grand County's Trail Mix Master Plan highlighted many popular bicycle trails, but was not intended as an inventory. Beyond the county roads, several hundred miles of trail exist, if not thousands.	
San Juan Trail Riders	207	6	Once the travel plan is implemented, BLM should practice adaptive management by testing mitigation techniques such as visitor education, signage, trail maintenance, and/or rerouting before prohibiting access. Further, the agency should prioritize the development of new bicycle, motorcycle, and ATV trails, with preference to SRMAs, and especially to the appropriate focus areas. Trail expansion would avoid pitting recreational trail users against one another on a rigid system of roads. By the same token, wide wash bottoms should remain open to all vehicles, instead of unduly restricting them to smaller vehicles.	See response to comment 122-14,
San Juan Trail Riders	207	7	Designating campsites should be done with public participation. Camping should not be confined to one mass site for any given. Most public-land users prefer dispersed camping. The Ruby Ranch Road and Utah Rims should each provide a dozen sites.	See response to comment 122-48.
San Juan Trail Riders	207	8	In areas where camping is not restricted to designated sites, the travel plan should be adjusted to access campsites.	See response to comment 122-48.
San Juan Trail Riders	207	9	(Please refer to maps provided by Ride with Respect, nonprofit) In the ERMA, Thompson Trail is unique by virtue of its sheer length and remoteness. Trail adoption by volunteers could preserve its single track character. Together with Thompson Wash and Copper Ridge Motorcycle Loop, Thompson Tail creates a unique route from the Sovereign Trail to Colorado. The Green River Gap and Browns Wash tie Colorado to the town of Green River. These single track trails should be	See response to 122-29.

			preserved, along with adjacent two-tracks. Together such remote, rugged routes offer a chance to experience the desert like neither SRMAs nor graded roads can do.	
San Juan Trail Riders	207	10	(Please refer to maps provided by Ride with Respect, nonprofit) …Kokopelli's Trail could be enhanced to create higher quality opportunities for motorized and non-motorized travel. The RMP should pledge to construct a Kokopelli Single track and mark a Kokopelli two track that would roughly parallel one another. Through Utah Rims, the single track should be open to motorcycles. Through Yellow Jacket, the single track should actually be an ATV trail. Everywhere else, the single track should be non-motorized. The two track would generally follow the current trail, with revisions to achieve a rugged, backcountry opportunity.	See response to comment 122-30.
San Juan Trail Riders	207	11	(Please refer to maps provided by Ride with Respect, nonprofit) Northeast of Green River, the non-WSA lands surrounding Tusher Canyon have great potential for mountain bike trails. This northwest corner of the Book Cliffs has access roads, rims with sweeping views including Desolation Canyon, and relatively good soil development. Similar to bike trails in Fruita a Tusher Canyon trail system would boost the economy of Green River, and dedicate quality trails for mountain biking.	See response to comment 122-31.
San Juan Trail Riders	207	12	(Please refer to maps provided by Ride with Respect, nonprofit) We generally support establishment of Labyrinth Rims SRMA in Alternative C. However, the Dee Pass Motorized Trail focus area should be expanded beyond Alternative D eastward to the power lines. The White Wash Sand Dunes OHV Open Area should be expanded by two square-miles beyond Alternative D (northward to Ruby Ranch Road and southward toward Red Wash Road), fee programs should be determined	See response to comment 122-32.

			with public involvement through a Resource Advisory Council. Approximately twenty-five miles of the surrounding OHV trails are popular among ATV riders, and should be designated as such. The Dead Cow Loop could be designated with the exception of the “low-water” alternate, to reduce riparian impacts. The Ten Mile Point area from Dripping Spring to Levi Well has relatively few routes and could be designated for non-mechanized focus. Ten Mile Wash should be designated without speed limits, since speed has little influence on the biophysical impacts of travel.	
San Juan Trail Riders	207	13	(Please refer to maps provided by Ride with Respect, nonprofit) The southwest corner of Labyrinth Rims is a relatively primitive area, and should be managed to preserve this quality. Spring Canyon, Hell Roaring Canyon, Spring Canyon Point, Dead Man Point, and south Horse Thief Point are best allocated as a non-mechanized focus. Motorized use there can be adequately accommodated by the Jeep Safari routes, plus a few choice spurs to overlooks. Closing the river road downstream from Spring Canyon would reduce recreation conflicts, while retaining access to Hey Joe Mine. Dubinky Wash is valuable for all vehicle use, and the single track near jug Rock should remain available for motorcycles.	See response to comment 122-33.
San Juan Trail Riders	207	14	(Please refer to maps provided by Ride with Respect, nonprofit) North of Highway 313, the single track which drops off Hidden Canyon Rims is a key link for motorcyclists and bicyclists, alike. The Mill Canyon – Seven Mile Rim mountain bike area should be rotated to become Mill Canyon – Tusher Rims. Tusher has better bicycling potential than Seven Mile due to less sand and more slick rock, with fewer roads. The Seven Mile – Upper Courthouse motorized backcountry touring area could be created to recognize the high-value roads that extend through Monitor and Merrimac to Big Mesa	See response to comment 122-33.

			campground. Upper Seven Mile Equestrian Area should be expanded by four square-miles to include some terrain above the rim.	
San Juan Trail Riders	207	15	(Please refer to maps provided by Ride with Respect, nonprofit) North of Highway 313, the single track which drops off Hidden Canyon Rims is a key link for motorcyclists and bicyclists, alike. The Mill Canyon – Seven Mile Rim mountain bike area should be rotated to become Mill Canyon – Tusher Rims. Tusher has better bicycling potential than Seven Mile due to less sand and more slick rock, with fewer roads. The Seven Mile – Upper Courthouse motorized backcountry touring area could be created to recognize the high-value roads that extend through Monitor and Merrimac to Big Mesa campground. Upper Seven Mile Equestrian Area should be expanded by four square-miles to include some terrain above the rim.	See response to comment 122-34.
San Juan Trail Riders	207	16	(Please refer to maps provided by Ride with Respect, nonprofit) The Klondike Mountain Bike focus area is a great foundation to develop mechanized single track. Most spur roads could be closed east of Bar M and Sovereign Trail areas. Still, the Sovereign ATV Loop should be permitted in its current location. Spur roads should also be closed north of the Copper Ridge Sauropod Trackway. Copper Ridge Motorcycle Loop is highly valuable to motorcyclists. Trail adoption could help to ensure enjoyment for mountain bikers, like Sovereign Trail. And like Sovereign ATV Loop, the Copper Ridge Motorcycle Loop could actually protect any non-mechanized trails that it surrounds by steering motorcyclists toward a legal alternative.	See response to comment 122-36.
San Juan Trail Riders	207	17	(Please refer to maps provided by Ride with Respect, nonprofit) Yellow Cat, Yellow Jacket, and Dome Plateau are worthy of SRMA designation. Yellow Cat and Yellow	See response to comment 122-38.

			Jacket are densely roaded and increasingly popular among four-wheeled visitors, so they should have a motorized backcountry touring focus. Few adjustments are needed to the travel plan, except around Owl Canyon where road access should be preserved. A non-mechanized focus area could buffer the entire boundary of Arches national Park, wrap around Dome Plateau, and terminate near Dewey Bridge. Only a couple overlooks of Lost Spring Canyon and Dome Plateau are needed, but they should remain open all the way to the rim.	
San Juan Trail Riders	207	18	(Please refer to maps provided by Ride with Respect, nonprofit) Utah Rims SMRA ought to extend further southwest to the Cisco Road. From the Cisco Road to Cottonwood Wash, a mountain bike focus could lay the groundwork for bicycle trails. From Cottonwood Wash to the West Water Road, a motorcycle focus would help preserve Guy's Trail and associated single track trails. From West Water Road to the state line, several existing single track trails should be recognized in the travel plan, plus one ATV loop in the northeast corner of May Flat. A non-mechanized focus area could be expanded from the West Water WSA further southwest all the way to private property. The entire spur road to Big Hole could be closed to enhance primitive characteristics. None the less, the West Water Canyon overlook road should not be closed. Mechanized visitors should be granted at least one viewpoint of the place that their activities are prohibited from.	See response to comment 122-39.
San Juan Trail Riders	207	19	(Please refer to maps provided by Ride with Respect, nonprofit) The Dolores Triangle includes a few remote areas where primitive character should be preserved. By closing two less-valuable spurs, Big Triangle substantially expands the West Water road less area to the north. Further south toward Buckhorn Draw, a few	See response to comment 122-40.

			roads could be added to ensure that quality motorized opportunities exist in the Dolores Triangle as well. From Steamboat Mesa to South Beaver Mesa, another focus area should be designated for primitive recreation. Half of the Dolores River overlooks could be preserved as cherry stems. Also, a road on the southeast ridge of South Beaver Mesa lies outside of this focus area, and should remain open.	
San Juan Trail Riders	207	20	(Please refer to maps provided by Ride with Respect, nonprofit) The Sand Flats Road traditionally connected trails such as Hells Revenge, Slickrock, and Fins 'N Things. Paving the road, and prohibiting OHVs from pavement, has fragmented the trail system. Thus, OHVs should be permitted to use Sand Flats Road from Hells Revenge exit to the end of the pavement. The new, reduced speed limit of 25 mph should be preserved. A non-motorized lane should be constructed to parallel the road and reduce congestion. Additionally, the ¼-mile slick rock route connecting Slick Rock Trail with Fins 'N Things should be designated for two-wheeled use to alleviate traffic along the main road. All of these measures would make Sand Flats more user-friendly and manageable, without further impacts to the environment.	See response to comment 122-41.
San Juan Trail Riders	207	21	(Please refer to maps provided by Ride with Respect, nonprofit) Special policies should continue permitting slick rock exploration. The Moab Field Office Off-Highway Vehicle Travel Map states that "Two-wheel motorcycles are allowed on established slick rock riding areas in the Slick Rock Trail, Bartlett Wash and Tusher Canyon areas and on slick rock areas along the Monitor and Merrimac and Lower Monitor and Merrimac trails where such use does not further disturb vegetation or soils" (dated march 8, 2001 as part of emergency restrictions). In these areas, travel could be further	See response to comment 122-42.

			restricted, but not so drastically as the draft RMP intends. Mechanized travel should still be allowed on any barren rock surface. Slick rock within one hundred yards of a designated route could remain open to motorized travel, except for Tusher slickrock which would be reserved for non-motorized use. This two-hundred yard corridor would accommodate the ways that people currently enjoy slick rock areas.	
San Juan Trail Riders	207	22	(Please refer to maps provided by Ride with Respect, nonprofit) The Black Ridge area presents many potential recreation opportunities nearby Moab. The South Spanish Valley Mountain bike area could be extended to include part of Pole Canyon. This augments the variety of terrain, and provides enough room for a full-day's ride. Sweeping travel restrictions associated with the draft RMP warrant designating an area for specialized sports which depend on unrestricted areas. Durable and irregular terrain that is suitable for motorcycle and bicycle trials riding exits in Pole Canyon from the power lines to Area BFE. In the same vein, a rock crawling area could be established on Black Ridge east of the power lines. This area is littered with old mine roads, and is currently open to cross-country travel. The site could be limited to designated rock crawling routes, and adopted by local clubs. West of the power line, the north flank of Black Ridge could be designated for equestrian use, as the backdrop to a residential area. The south flank could be a bicycle free ride area, since it provides one thousand feet of vertical relief, and graded roads for shuttling. Kane Creek is a dry wash from Highway 191 up to the Black Ridge Road. It should be open for OHVs to create a loop with Behind-The-Rocks while avoiding the highway.	See response to comment 122-43.
San Juan Trail Riders	207	23	(Please refer to maps provided by Ride with Respect, nonprofit) Hatch Wash backpacking focus area could be	See response to comment 122-45.

			expanded for better backpacking. Alternative C proposes to designate roughly twenty spur roads to the rim of Hatch Wash. However, only five are necessary to view most stretches of the Canyon.	
San Juan Trail Riders	207	24	(Please refer to maps provided by Ride with Respect, nonprofit) Cameo Cliffs SRMA should also be expanded for better OHV riding. The current boundary offers a meager half-day for the skilled rider. Extending the SRMA east to Big Indian Valley could still avoid mining activity. Shifting the boundary north to the Brown's Hole Road could still skirt the nearby residential area.	See response to comment 122-44.
Bookcliff Rattlers Motorcycle Club	208	1	BLM should re-evaluate the overall planning direction. First, please seriously look at reducing the number of management "overlays". It is simply impossible to understand what the BLM wants to do. Second, Multiple Use requires a special balance between use and protection of resources. When attempting to strike that balance, look for ways to maximize uses. Oil and gas and other commercial uses should be viewed as an opportunity to enhance adjacent recreational uses. Utilize the analysis required for "clearance" of existing and proposed recreation infrastructure (trails, trail heads, campsites etc.). Aggressively mitigate impacts. Promote an ethic of 'shared use' instead of restrictive zoning.	See response to comment 121-9.
Bookcliff Rattlers Motorcycle Club	208	2	Alternative D has less of an emphasis on motorized recreation than Alternative C. There is no arguing this point. Although D designates a few more miles of trail and gives motorized users a tad more open area in White Wash and the focus area, it negates all that by putting the hugely popular Westwater area in an ERMA! All of the Alternatives represent a huge reduction in motorized recreation. It is our understanding that NEPA and BLM's planning regulations require a wide range of Alternatives. Based on the DEIS and the other	The DRMP/EIS identifies 6,199 miles of inventoried routes in Alt A; 2,871 miles of inventoried routes are excluded from any of the action alternatives because there was no purpose and need for these routes. Alt C designates 3,693 miles of full-sized vehicle routes and 282 miles of motorized single track. Alt D includes 3,855 miles of full-sized vehicle routes and 340 miles of motorized single track. Therefore, Alt D provides more motorized opportunities than does Alt C. The commentor's assertion that placing the Westwater

			materials provided for review, it looks as if vegetation and wildlife indicators are trending upward and BLM is meeting its sustainability goals, despite a prolonged drought. It seems to us then that there is a responsibility, if not a legal mandate, to at least consider one Alternative that didn't represent a huge loss to motorized uses. Regarding labeling Alternative D as "emphasizing motorized uses:" doesn't NEPA require that a DEIS be accurate in describing the agency's proposals? This seems to be a major problem. How will this be addressed in the final DIES without requiring additional public comment? BRMC Recommendation: BLM should develop another alternative that truly DOES emphasize motorized recreation by NOT effectively closing off large areas to it.	area in an Extensive Recreation Management Area (ERMA) negates the additional miles of motorized routes and open areas in Alternative D is incorrect. The Westwater area is in an ERMA under the current plan (Alt A). Travel management in the Westwater area is less restrictive under Alternative D than under Alternative C, although Alt C is more restrictive than Alt A. The commentor's assertion that all the action alternatives represent a "huge loss" in motorized recreation is incorrect. Although 2,871 miles of inventoried routes were eliminated between Alt A and the action alternatives, these routes were determined to have no purpose and need primarily because they were redundant or received virtually no use. The comment assumes that the motorized recreation opportunities in the action alternatives are inadequate to meet current or anticipated future demand. The BLM in Chapter 4 admits that all the action alternatives reduce motorized recreation opportunities, but that Alternative D emphasizes motorized use relative to the other action alternatives. NEPA and CEQ require that BLM provide a reasonable range of alternatives in the DRMP/EIS, and the BLM asserts that it has done so. As described in Appendix G, the BLM's travel plan formulation attempts to balance transportation needs (including motorized recreation) with other resource uses and protections.
Bookcliff Rattlers Motorcycle Club	208	3	Putting a requirement to erect miles of fences across the dune field in the RMP is problematic. The obvious question is; if your RMP says "…the dune field cottonwood trees and White Wash water sources which would be closed to motorized travel and fenced," and that proves to be unworkable, would it take an RMP amendment to alter the plan?	Alt C and Alt D of the DRMP/EIS designate the White Wash area as open to cross country travel. Fencing of the Cottonwood trees and water sources is an implementation action to protect these resources and does not require a land use planning decision. The White Wash area would remain open to cross country travel unless the status is changed through an amendment to the land use plan.

			BLM is concerned about the cottonwood trees, BRMC suggests that this concern be addressed in the RMP. This recommendation is based on the success the BLM has had in 10 Mile Wash. The White Wash RMP could direct that, in “wet areas” travelways would be marked so as to minimize or eliminate impacts on young cottonwood trees.	
Bookcliff Rattlers Motorcycle Club	208	4	The open area (at White Wash Sand Dunes) should be located along easily identified roads, as these are easier to locate and enforce. We have reviewed and support the “encourage/allow /prohibit” plan proposed by the Blue Ribbon Coalition. Not all cross country use occurs on the sand field. There is a great deal of vehicle travel that will now be limited to designated roads. Making that kind of change in use is hard to do overnight. BRC’s plan basically freezes the use as it is now, allows BLM to close areas should that be needed and directs review and analysis of the existing routes and their possible incorporation into the Travel Plan. This sort of approach will be needed for proper implementation of BLM’s plan.	See response to comment 123-35.
Bookcliff Rattlers Motorcycle Club	208	5	The BLM should remove the section requiring the Special Recreation Permit idea, and instead insert guidance to pursue funding sources, including but not limited to potential free programs at the White Wash Sand Dunes. Implementation of this proposal will be difficult and perhaps unworkable.	See response to comment 123-10.
Bookcliff Rattlers Motorcycle Club	208	6	The BLM should not establish designated camping areas except in highly-developed areas. The BLM has failed to designate spurs to campsites along the Ruby Ranch road near White Wash, leaving nowhere for users to camp. This plan cannot be successfully implemented, and clearly demonstrates the flow in attempting to limit vehicle camping to designated sites only. In addition, the DEIS does not sufficiently analyze the	A specific purpose and need of route designation in the alternatives for the Travel Plan was recreation opportunities and experiences which includes dispersed camping (see pg. G-12 of the DRMP/EIS). The open area to the west side of the White Wash Sand Dunes has been enlarged to accommodate the camping that occurs to the south of the oil well. The commentor’s suggestion of a 300 foot wide area along designated motorized travel routes would effectively

			impacts to dispersed camping, nor does it provide a wide range of Alternatives to address dispersed camping. BRMC Recommendation: Vehicle use be allowed 300 feet off designated roads for dispersed camping and vehicle use should be allowed on spurs that lead to an existing campsites.	greatly increase the acreage open to cross-country travel, which is inherently incompatible with the intention of moving to a system of designated routes. The 300 foot area would result in unacceptable impacts to a number of natural and cultural resources. See also responses to comments 120-83 and 120-86.
Bookcliff Rattlers Motorcycle Club	208	7	The DEIS should establish additional areas for competitive use. Additional competitive routes should be established to create user variety and provide rest and rotation for other resources. The permitting process and associated fees should be minimized.	In Alt C and Alt D of the DRMP/EIS, the Dee Pass Motorized Trail Focus Area (within the Labyrinth SRMA) has been identified as the area for competitive motorized events. On pg. 2-25 it states: “competitive routes within this area would be identified based on site-specific NEPA analysis.” The BLM will continue to follow the NEPA process and its Special Recreation Permit (SRP) policies and fee structures for all events which fall under its jurisdiction.
Bookcliff Rattlers Motorcycle Club	208	8	All of the action alternatives fail to supply a sufficient number of OHV routes to meet existing demand. There needs to be some process to consider adding routes to the Travel Plan, either in the FEIS or under subsequent site specific planning.	The commentor provides no data to support the assertion of an insufficient supply of OHV routes to meet existing demand. Furthermore, the BLM must consider all resources and resource uses under the multiple use mandate of the Federal Land Policy and Management Act, of which motorized recreation is only one. See responses to comments 208-2 and 208-6. The DRMP/EIS specifically allows for the addition of routes to the Travel Plan. The document states on p. 2-48 that the Travel Plan “may be modified through subsequent implementation planning and project planning on a case-by-case basis”.
Bookcliff Rattlers Motorcycle Club	208	9	BLM should identify routes suitable for ATVs in its travel plan, rather than passively assuming that many of the OHV routes submitted in scoping are motorcycle-only. The FEIS should consider designating more ATV trails.	The BLM has incorporated the commentors suggestion for a change in route use involving ATVs in the PRMP/EIS. See response to comment 120-90. See also responses to comments 208-8 and 122-30 regarding the process for designating new routes.

			The BLM should identify routes as “roads, primitive roads, or trails”.	See response to comment 123-7 for a discussion of BLM road terminology.
Bookcliff Rattlers Motorcycle Club	208	10	There needs to be a mechanism built into the plan that allows for construction of new trails.	See responses to comments 122-30 and 208-8.
Bookcliff Rattlers Motorcycle Club	208	11	The plan should allow that wash bottoms be open to OHV use. These make challenging and interesting trails that naturally repair themselves after rain events and which are generally not visible to the public.	In formulating the alternatives for the Travel Plan in the DRMP/EIS, the BLM considered route designation by weighing purpose and need against resource conflicts. Floodplain and riparian areas were identified as resource conflicts that inventoried routes were weighed against. Travel in washes degrades stream banks, leads to accelerated flood velocity and erosion (see pg. G-24) See also response to comment 122-14. The commentor provides no site specific information pertaining to motorized travel in wash bottoms. See also response to comment 208-8.
Bookcliff Rattlers Motorcycle Club	208	12	The plan should stipulate that for every mile of trail closed, there must be another mile of new equivalent trail opened.	The commentor has not provided any site specific information on proposed additional routes to be added to the Travel Plan. There are no laws, policies, or directions which require the BLM to substitute new routes for routes closed.
Bookcliff Rattlers Motorcycle Club	208	13	BRMC requests that BLM consider an additional SRMA – “Wild Cow Wash” – in the Final Plan. We believe that there is a need to plan for a motorized singletrack trail system surrounding Wild Cow Wash beneath the Bookcliffs. This SRMA should extend north into the Bookcliffs proper.	The recreation use in the eastern Bookcliffs (referred to by commentor as Wild Cow Wash) is not at a high enough level to warrant a Special Recreation Management Area designation. The commentor has not provided any site specific information on proposed additional single track routes to be added to the Travel Plan. The BLM identified through scoping a large number of

				recreation issues. Based on these issues, the BLM developed a variety of Special Recreation Management Areas (SRMAs), as well as a variety of focus areas. These SRMAs and focus areas are designed to address a number of recreation needs, and the process is described in Chapter 4, page 192, of the DRMP/EIS. The BLM believes that it has incorporated an adequate range of recreation opportunities in its action alternatives. During the scoping period for the land use planning process, the BLM did not receive any comments identifying a need for the SRMA suggested by the commentor nor for the accompanying motorized trail system. See response to comment 208-8.
Bookcliff Rattlers Motorcycle Club	208	14	The SRMAs that have a motorized focus should say they have a motorized focus. The only references to OHV use for the Labyrinth Rims SRMA is; “quality on-route mountain biking and backcountry driving experiences on established routes throughout the SRMA.” We understand this accurately describes some of this SRMA, but there is nothing in this management goal about trail based OHV use, or open riding on dunes, which are the predominant activities in much of the SRMA. BRMC Recommendation: The Utah Rims, Labyrinth Rims and Cameo Cliffs all have an OHV focus. Trail based OHV recreation should be emphasized in all of the guidance, especially the management goals. In motorized SRMA’s, provisions for constructing new trails should be incorporated into the RMP.	The commentor is confusing the Labyrinth Canyons Special Recreation management Area (SRMA) with the large number of Focus Areas within this larger SRMA. It is incorrect to say that the entire SRMA has a “motorized focus”. There are three areas within this SRMA that have the type of OHV-oriented focus that the commentor desires -- the White Wash Sand Dunes Managed Open Area (Alts C and D of DRMP/EIS), the Dee Pass Motorized Trail Focus Area (Alts. C and D) and the Gemini Bridges Motorized Touring Area (Alt. C). The commentor’s assertion that trail-based OHV use and open riding on dunes are the predominant activity in much of the SRMA is an inaccurate representation of how the SRMA would be managed under any of the action alternatives. Additionally, it is not correct to label the Utah Rims as an OHV SRMA, as the DRMP/EIS specifically describes the management objectives for that particular SRMA as providing OHV, mechanized and hiking opportunities. The Cameo Cliffs SRMA is described in the DRMP/EIS as providing a motorized/designated trail system.

				As far as creating new routes are concerned, see response to comment 208-8.
Bookcliff Rattlers Motorcycle Club	208	15	BRMC supports the adoption of this recommendation from RWR with modifications. Utah Rims SRMA ought to extend further southwest to the Cisco Road. From the Cisco Road to Cottonwood Wash, a mountain bike focus could lay the groundwork for bicycle trails. From Cottonwood Wash to the Westwater Road, a motorcycle focus would help preserve Mel's Loop and associated singletracks. From Westwater Road to the state line, several existing singletracks should be recognized in the travel plan, plus one ATV loop in the northeast corner of May Flat. A non-mechanized focus area could be developed in the Westwater WSA but leaving the spur road to Big Hole open to motorized users. The Westwater Canyon overlook road should not be closed. Mechanized visitors should be allowed at least these two viewpoints of the place that their activities are prohibited from.	See response to comment 122-39 regarding Utah Rims SRMA. Concerning the creation of new routes, see response to comment 208-8. The routes the commentor does not want closed are left open to motorized use in Alternative D.
Bookcliff Rattlers Motorcycle Club	208	16	BRMC supports the adoption of this recommendation from RWR with modifications. Yellow Cat, Yellow Jacket, and Dome Plateau are worthy of SRMA designation. Yellow Cat and Yellow Jacket are densely roaded and increasingly popular among four-wheeled visitors, so they should have a motorized backcountry touring focus. Few adjustments are needed to the travel plan, except around Owl Canyon where Road access should be preserved. A non-mechanized focus area could buffer the entire boundary of Arches National Park, wrap around Dome Plateau, and terminate near Dewey Bridge. Only a couple overlooks of Lost Spring Canyon and Dome Plateau are needed, but they should remain open all the way to the rim.	See response to comment 122-38 regarding Yellow Cat, Yellow Jacket, and Dome Plateau. Several of the routes of concern to the commentor are designated for motorized use in one or more of the action alternatives for the Travel Plan in the DRMP/EIS.
Bookcliff Rattlers Motorcycle	208	17	BRMC supports the adoption of this recommendation from RWR with modifications. The Black Ridge area presents many potential recreation opportunities nearby	See responses to comments 122-43 and 208-8 the proposed Black Ridge Special Recreation Management Area and the addition of routes.

Club			Moab. The South Spanish Valley Mountain bike area could be extended to include part of Pole Canyon. This augments the variety of terrain, and provides enough room for a full-day's ride. Sweeping travel restrictions associated with the draft RMP warrant designating an area for specialized sports which depend on unrestricted areas. Durable and irregular terrain that is suitable for motorcycle and bicycle trials riding exits in Pole Canyon from the power lines to Area BFE. In the same vein, a rock crawling area could be established on Black Ridge east of the power lines. This area is littered with old mine roads, and is currently open to cross-country travel. The site could be limited to designated rock crawling routes, and adopted by local clubs. West of the power line, the north flank of Black Ridge could be designated for equestrian use, as the backdrop to a residential area. The south flank could be a bicycle free ride area, since it provides one thousand feet of vertical relief, and graded roads for shuttling. Kane Creek is a dry wash from Highway 191 up to the Black Ridge Road. It should be open for OHVs to create a loop with Behind-The-Rocks while avoiding the highway.	
Bookcliff Rattlers Motorcycle Club	208	18	BRMC supports the adoption of this recommendation from RWR with modifications. Cameo Cliffs SRMA should also be expanded for better OHV riding. The current boundary offers a meager half-day for the skilled rider. Extending the SRMA east to Big Indian Valley could still avoid mining activity. Shifting the boundary north to the Brown's Hole Road could still skirt the nearby residential area.	See response to comment 122-44.
Bookcliff Rattlers Motorcycle Club	208	19	BRMC supports the adoption of this recommendation from RWR with modifications. Kokopelli's Trail could be enhanced to create higher quality opportunities for motorized and non-motorized travel. The RMP should pledge to construct a Kokopelli Single track and mark a Kokopelli two track that would roughly parallel one	See response to comment 122-30.

			another. Through Utah Rims, the single track should be open to motorcycles. Through Yellow Jacket, the single track should actually be an ATV trail. Everywhere else, the single track should be non-motorized. The two track would generally follow the current trail, with revisions to achieve a rugged, backcountry opportunity.	
Bookcliff Rattlers Motorcycle Club	208	20	BRMC supports the adoption of this recommendation from RWR with modifications. The single track which drops off Hidden Canyon Rims is a key link for motorcyclists and bicyclists, alike. The Mill Canyon – Seven Mile Rim mountain bike area should be rotated to become Mill Canyon – Tusher Rims. Tusher has better bicycling potential than Seven Mile due to less sand and more slick rock, with fewer roads. The Seven Mile – Upper Courthouse motorized backcountry touring area could be created to recognize the high-value roads that extend through Monitor and Merrimac to Big Mesa campground. Upper Seven Mile Equestrian Area should be expanded by four square-miles to include some terrain above the rim.	See responses to comments 122-34 concerning the areas discussed by the commentor and 208-8 concerning the addition of new routes.
Bookcliff Rattlers Motorcycle Club	208	21	BRMC supports the adoption of this recommendation from RWR with modifications. The non-WSA lands surrounding Tusher Canyon have great potential for mountain bike trails. This northwest corner of the Book Cliffs has access roads, rims with sweeping views including Desolation Canyon, and relatively good soil development. Similar to bike trails in Fruita a Tusher Canyon trail system would boost the economy of Green River, and dedicate quality trails for mountain biking.	See responses to comments 122-31 concerning the area northeast of Green River and 208-8 concerning the addition of new routes.
Bookcliff Rattlers Motorcycle Club	208	22	BRMC supports the adoption of this recommendation from RWR with modifications. An additional bicycle focus area west of South Fork Seven Mile Canyon could provide cross-country and vehicle-assisted rides from the upper Gemini trailhead down to the switchbacks on Highway 313. The Gemini Bridges motorized backcountry touring area could be shifted to include all of Little Canyon Rim. The spur to Gemini	See response to comment 122-35 regarding the area south of Highway 313. The very short spur route to Gemini Bridge has been closed to motorized use in one or more action alternatives due to resource conflicts identified by the BLM in its Travel Plan formulation. This process is described in detail in Appendix G of the DRMP/EIS.

			Bridges should remain open to allow the unique experience of driving the bridge. Mountain bike alternatives to the roads could be developed in this area, as proposed by Trail Mix. The Gold Bar hiking area could be expanded further up Day Canyon, while only closing one spur road.	
Bookcliff Rattlers Motorcycle Club	208	23	BRMC supports the adoption of this recommendation from RWR with modifications. The Klondike Mountain Bike focus area is a great foundation to develop mechanized single track. Most spur roads could be closed east of Bar M and Sovereign Trail areas. Still, the Sovereign ATV Loop should be permitted in its current location. Spur roads should also be closed north of the Copper Ridge Sauropod Trackway. Copper Ridge Motorcycle Loop is highly valuable to motorcyclists. Trail adoption could help to ensure enjoyment for mountain bikers, like Sovereign Trail. And like Sovereign ATV Loop, the Copper Ridge Motorcycle Loop could actually protect any non-mechanized trails that it surrounds by steering motorcyclists toward a legal alternative.	See response to comment 122-36.
Bookcliff Rattlers Motorcycle Club	208	24	BRMC supports the adoption of this recommendation from RWR with modifications. The Dolores Triangle includes a few remote areas where primitive character should be preserved. By closing two less-valuable spurs, Big Triangle substantially expands the West Water road less area to the north. Further south toward Buckhorn Draw, a few roads could be added to ensure that quality motorized opportunities exist in the Dolores Triangle as well. From Steamboat Mesa to South Beaver Mesa, another focus area should be designated for primitive recreation. Half of the Dolores River overlooks could be preserved as cherry stems. Also, a road on the southeast ridge of South Beaver Mesa lies outside of this focus area, and should remain open.	See response to comment 122-40.
Bookcliff Rattlers	208	25	BRMC supports the adoption of this recommendation from RWR with modifications. The Sand Flats Road	See response to comment 122-41.

Motorcycle Club			traditionally connected trails such as Hells Revenge, Slickrock, and Fins 'N Things. Paving the road, and prohibiting OHVs from pavement, has fragmented the trail system. Thus, OHVs should be permitted to use Sand Flats Road from Hells Revenge exit to the end of the pavement. The new, reduced speed limit of 25 mph should be preserved. A non-motorized lane should be constructed to parallel the road and reduce congestion. Additionally, the ¼-mile slick rock route connecting Slick Rock Trail with Fins 'N Things should be designated for two-wheeled use to alleviate traffic along the main road. All of these measures would make Sand Flats more user-friendly and manageable, without further impacts to the environment.	
Bookcliff Rattlers Motorcycle Club	208	26	BRMC supports the adoption of this recommendation from RWR with modifications. Special policies should continue permitting slick rock exploration. The Moab Field Office Off-Highway Vehicle Travel Map states that "Two-wheel motorcycles are allowed on established slick rock riding areas in the Slick Rock Trail, Bartlett Wash and Tusher Canyon areas and on slick rock areas along the Monitor and Merrimac and Lower Monitor and Merrimac trails where such use does not further disturb vegetation or soils" (dated March 8, 2001 as part of emergency restrictions). In these areas, travel could be further restricted, but not so drastically as the draft RMP intends. Mechanized travel should still be allowed on any barren rock surface. Slick rock within one hundred yards of a designated route could remain open to motorized travel, except for Tusher slickrock which would be reserved for non-motorized use. This two-hundred yard corridor would accommodate the ways that people currently enjoy slick rock areas.	See response to comment 122-48
Bookcliff Rattlers Motorcycle	208	27	BRMC supports the adoption of this recommendation from RWR with modifications. In the ERMA, Thompson Trail is unique by virtue of its sheer length and	See response to comment 122-29.

Club			remoteness. Trail adoption by volunteers could preserve its single track character. Together with Thompson Wash and Copper Ridge Motorcycle Loop, Thompson Tail creates a unique route from the Sovereign Trail to Colorado. The Green River Gap and Browns Wash tie Colorado to the town of Green River. These single track trails should be preserved, along with adjacent two-tracks. Together such remote, rugged routes offer a chance to experience the desert like neither SRMAs nor graded roads can do.	
Glen Canyon Group	209	1	The Draft is comprehensive but extremely complicated and not well cross-referenced.	See response to comment 123-14.
Glen Canyon Group	209	2	Since eight months were allowed for the scoping process, it is still hoped that a similar amount of time will be allotted for this review and comment period. In the event that – as we've requested, an extension is granted, we will amend, extend and resubmit our Comments.	The BLM has provided the public with 90 days in which to review and comment on the DRMP/DEIS. The standard comment period for an EIS is 45 days in accordance with the Federal Council on Environmental Quality regulations. Thus, double the amount of time has been provided to comment on the DRMP/DEIS. BLM has made the DRMP/EIS available, free of charge, in a variety of mediums, including paper, CD, and online. In addition, BLM staff has offered to meet individually with groups or individuals to explain the Draft RMP/EIS and help focus review and comment efforts. Finally, BLM held four open houses around the State to facilitate review of the Moab DRMP/DEIS.
Glen Canyon Group	209	3	Given impacts of Alternative C, Alternative B should be the preferred alternative. The Executive Summary concludes that Alternative C was chosen as the preferred alternative based on: 1) Balance of use and protection of resources, and 2) Extent of the environmental impact. (Page ES-8) In our view, BLM's "preferred alternative" is not balanced and in fact abnegates their responsibility to protect the resources entrusted to their care in favor of satisfying the demands of off-roaders and oil/gas interests. As for "extent" of impact, the Draft RMP/EIS demonstrates that the Conservation Alternative (B) would produce less	The DRMP/EIS provides 4 alternatives that consist of no action, emphasis of protection and preservation of natural resources, balance between commodity production and protection of natural resources, and emphasis of commodity production and extraction. These alternatives provide a broad range of management actions to address the issues raised during scoping. The BLM acknowledges throughout the DRMP/EIS that Alternative B produces fewer adverse environmental impacts -- that is the expressed intention of that alternative. The BLM, however, is not required to choose the alternative which produces the least environmental impact, but must

			total impact on the environment and definitely fewer adverse impacts than C.	balance competing resources within its sustained yield, multiple use mandate. See also response to comment 121-1.
Glen Canyon Group	209	4	Labeled as the major issue identified during the scoping process was "Issue 1. – Recreation Use and OHVs – How can increased recreation use, especially motorized vehicle use, be managed while protecting natural resource values?" The RMP/EIS does not address both parts of the question. It is not balanced. A balanced plan would look to the future with protection as the primary aim, would listen to all legitimate voices, and would actually manage – not just recognize, the use, overuse, and abuse of natural resource values. A balanced plan that would be easier to decide and easier to defend, would be one that does the right thing – it upholds and holds fast to the paramount goal: Quality Environment.	This is not a comment that the BLM can respond to, but a statement of opinion. Also see response to comment 209-3.
Glen Canyon Group	209	5	We are dismayed that the Travel Management Plan has so many miles of road that the roads cannot be adequately patrolled or monitored by the BLM staff.	The issue raised by the commentor is one of implementation. See responses to comments 124-120 and 124-122.
Glen Canyon Group	209	6	We are also dismayed that although Grand County was closely consulted on all road decisions, BLM was aware that the County representative, Jerry McNeely, was consulting only with the motorized users and not with the "quiet" users. We feel totally disenfranchised from the process of selecting open and closed roads. A balanced travel plan is not developed by just consulting with OHV drivers. As shown on Table 8 of Appendix G (pages G-20 and G-21), numerous routes and segments of routes were added to the database, but BLM completely rejected the recommendations of the Red Rock Heritage Travel Plan on the excuse that there are conflicts with Grand County's road inventories. BLM even failed to examine the information available to them in draft form from the National Visitor	The BLM's Alternative C was supported by the entire Grand County Council, and not just one representative. As described in Appendix G, The DRMP/EIS used a systematic interdisciplinary approach fully considering physical, biological, economic, and social aspects of management actions for the range of alternatives. The BLM did not rely on the counsel of any one individual; the DRMP/EIS is the BLM's plan, and not that of any of the BLM's cooperating agencies. See response to comment 124-9, explaining the several reasons for the BLM's rejection of the Red Rock Heritage Travel Plan. It is worth noting that the commentor's earlier comment complaining that the BLM would not be able to patrol all the miles of routes in the action alternatives, yet supports a plan with more miles of routes

			Use Monitoring study conducted by the MFO in FY 2006, which described numbers, motives, likes and dislikes and other characteristics of quiet users – hikers, bikers, boaters, and visitors driving for pleasure.	than any of the BLM's action alternatives. See response to comment 124-2 concerning the BLM's incorporation of NVUM data into the plan.
Glen Canyon Group	209	7	BLM must be much more proactive on this Travel Management Plan, and anticipate the next two decades of motorized recreation. This RMP is the perfect time to actually put some "teeth" into what BLM refers to as a Travel Management Plan, but which appears to be just a Travel Plan. The Final RMP should do more than state where vehicles can go and where they can't go – It needs to provide meaningful management and enforcement. BLM should include in the Travel Plan the possibility of permits and temporary and permanent closures throughout the MFO area. BLM has proved over the past 5 years of the Easter Jeep Safari that they can both monitor usage and manage travel. They set up a monitoring plan with specific goals and objectives, with before and after examination of effects over a 10-day period of high road usage. As they analyzed the results, they instituted one-way travel, exclusive use (ie permitting) and educational tools for keeping vehicles where they are permitted. This experience should be used as a model for monitoring the designated roads in the RMP.	The issues raised by the commentor are implementation issues. See responses to comments 124-120, 124-122 and 120-95.
Glen Canyon Group	209	8	Using Scoping Comments to develop Travel Plan As reflected in the Scoping Process Report, 2004, the great majority of those sending letters and emails called for restrictions on OHV travel, for unambiguous designation "on the ground," education of users, for closing unnecessary routes, and monitoring and enforcement. A small minority asked for increased access, playgrounds and open areas, and for no closure of routes, tracks and trails. Similar sentiments were found in a survey of Grand County residents in February of '05 regarding tourism and off-road vehicle (ORV) activities. The poll	The BLM has addressed the concerns raised in scoping through its Travel Plan formulation. The DRMP/EIS specifically addresses the desires of non-motorized recreationists and the impacts created by OHV use, especially cross-country travel. See responses to comments 124-4 and 124-34.

			showed that 63.5% of residents thought tourists were bothered by ORV activity. Forty percent thought that tourists came to the area for non-ORV recreation; 44.5% thought tourists were evenly divided between motorized and non-motorized sports enthusiasts, while only 6.5% thought most tourists came primarily "to play in an off-road vehicle." ("Results announced from local survey," Moab Times Independent 3/3/2005)	
Glen Canyon Group	209	9	Implementation and Project Planning BLM defers modifications/adjustments of designated routes until "implementation and project-planning " phases through "a collaborative process involving local governments and the public. The impacts to travel management would be beneficial in the long-term because potential travel-related resource use conflicts would be identified and satisfactorily resolved since the route modification process would include interested and/or concerned stakeholders." (Page 4-405) Need we remind the BLM that this approach was tried and failed. Although carefully constructed for proportional representation of all relevant segments of the community, the County's Access Committee was finally dissolved as the members were unable to reach a consensus on anything. BLM needs to reconsider its approach, perhaps going to a public hearing and appeal process or a mediated decision-making process.	This is an implementation issue. See responses to comments 124-120, 124-122 and 120-95.
Glen Canyon Group	209	10	…confusing Table 4.126 OHV Designations by Alternative on page 4-409. The table which contains both acres and miles has four footnotes, of which the second is not referenced in the table itself. "These are the miles of designated routes at time of EISA publication. After the issuing of the ROD, minor adjustments may be made by the MFO to more accurately define the designated routes." BLM should let us know where the superscript belongs in the table, what the definition of "minor" is, and how the public will be involved.	Footnote 2 refers to the bottom two rows of Table 4.126; this has been fixed. The "minor adjustments" that the commentor wishes defined relate to GIS data smoothing issues, which the BLM would expect (but cannot predict with certainty before the data smoothing is completed) to add up to well less than one per cent in either direction. The manner of public involvement is an implementation activity. The process is described on page 2-48 of the DRMP/EIS.

Glen Canyon Group	209	11	…it is not clear how the final acreage and boundaries were determined for: Behind the Rocks, Coal Canyon, Fisher Towers, Goldbar, Gooseneck, and Westwater Creek.	Table P-1 refers exclusively to areas inventoried during the 1999-2003 Utah Wilderness Inventory, the processes and results for which are fully described in the 1999 publication and the 2003 revision document, both of which have been publicly available for several years. Table P-2 refers exclusively to new wilderness proposals submitted to the BLM by external groups; none of these were included in the 1999-2003 inventory. Maps for each of these areas, as well as the decision process undertaken by the BLM for each of these areas, are available on the Moab BLM's planning website.
Glen Canyon Group	209	12	Above all, it is not explained how the title "Non-WSA Lands with Wilderness Characteristics" was arrived at. Wilderness Character is a stronger term than Wilderness Characteristics and is preferable. Most if these lands disappear partially or entirely into SMRA's, ERMA's, and/or ACEC's and the management protocols of these areas do not explain how their wilderness character/characteristics will be preserved, as required by the Handbook, I.e., "avoid or minimize impacts to wilderness characteristics".	Wilderness character is a term which applies to Wilderness Study Areas and designated wilderness, both of which must be managed to maintain wilderness character. The term "Non-WSA Lands with Wilderness Characteristics" was an attempt by the state-wide Utah planning team to aggregate, for clarity, the various categories of lands found to possess wilderness characteristics (Wilderness Inventory Areas, external wilderness proposals, Reasonable Probability Determinations). These lands are then distinguished from Wilderness Study Areas, whose management is beyond the scope of the current planning effort. Those lands which have overlapping management protocols will be managed under the most restrictive protocol, should the various protocols be in conflict. Thus, lands being managed to protect wilderness characteristics will have the necessary protocols to accomplish that objective, regardless of overlapping planning decisions. Under at least one alternative in the DRMP/DEIS, all lands identified by BLM as having wilderness characteristics would be managed to protect the naturalness of the areas and the opportunities for solitude and primitive recreation. Protecting the wilderness

				characteristics would include, among other restrictive management prescriptions, making them unavailable for oil and gas leasing and closing the area to OHV use. The management and level of protection of the wilderness characteristics on Non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). However, the BLM may manage the lands to protect and/or preserve some or all of those characteristics through the land use planning process. In addition, under the land use planning process, the BLM must consider a range of alternatives for the lands identified with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these Non-WSA lands.
Glen Canyon Group	209	13	Map 2-24-B Volume 3 shows WSA's in faint dots and Areas with Wilderness Characteristics in brighter dots and bold outlines. But they are not identified. It would have been easy to put the names of the designated areas on the map, as was done with other maps. (See, for example, Map 2-4 Grazing Allotments.) This very important map must be printed on an 11x14 inch page with all the areas clearly identified.	Detailed maps of each area are available either in the 1999 Utah Wilderness Inventory or (for areas proposed since 1999) on the Moab BLM's planning website. The level of detail suggested by the commentor would be so great as to make any printed map smaller than plotter size almost unreadable. This is because many of the areas in question are quite small "add-ons" to existing Wilderness Study Areas or National Park Service areas that are administratively endorsed for wilderness.
Glen Canyon Group	209	14	…there should be individual maps of each Non-WSA Land with Wilderness Characteristics showing their boundaries and the portions of each which would be covered by SMRA's, ERMA's, and ACEC's, and clearly showing the overlaps, as well as portions which are outside these proposed management designations. Include them in the Final RMP/EIS.	The GIS data underlying this request is available to the public upon request.
Glen Canyon Group	209	15	RE: Impact of Lands and Realty Management Decisions – Section 4.3.8.2.3, Pages 4-113 to 4-117, Table 4.48, Pages 4-114 and 4-115 Table 4.48 makes it clear that Alternative B would exclude all 32 areas from Rights of Way (ROW)	On non-WSA lands with wilderness characteristics that are not in avoidance or exclusion areas for rights-of-way, all applications for rights-of-way would be considered on a case-by-case basis and the project would be analyzed in an appropriate NEPA document to determine if the

			being established under the rubric of Lands and Realty Management Decisions. Under Alternative C, however, only a fourth of the Beaver Creek area would be excluded from ROWs. The rest of Beaver Creek and all of the remaining areas would be ROW "avoidance." In all areas except Gooseneck, Mill Creek Canyon, and Shafer Canyon, the number of acres of avoidance is less than the total acreage with wilderness characteristics. The text does a poor job of explaining what happens to the remaining acreage which would presumably be open to powerlines, pipelines, and othe utility corridors.	project would be authorized and under what conditions.
Glen Canyon Group	209	16	RE: Impact of Lands and Realty Management Decisions – Section 4.3.8.2.3, Pages 4-113 to 4-117, Table 4.48, Pages 4-114 and 4-115 We noticed in the Executive Summary that "rights of way" covered more than these utility corridors, per the sentence. "Other land uses within the planning area include rights-of-way (ROWs) for roads, pipelines, powerlines, and communication sites, film permits, and livestock grazing." (page ES-7) The Glossary similarly includes roads in the definition of ROWs. The Final RMP/EIS should convey the more restrictive definition from the Lands and Realty sections.	Title V of FLPMA provides authority for issuance of rights-of-way for various uses over, upon, under, and through the public lands, including roads, pipelines, powerlines, and communication sites. The definition is beyond the scope of the plan.
Glen Canyon Group	209	17	Impacts of Mineral Resources: Oil and Gas – Section 4.3.8.2.5.1 Pages 4-117 to 4-129. Table 4.53 on pages 4-120 through 4-123 of Leasing Stipulations is very misleading in that it lists all non-WSA areas as "closed" under Alternative B. However, quite a few of these areas contain portions which are currently leased – Arches Adjacent, Coal Canyon, Dead Horse Cliffs, Dome Plateau, Floy Canyon, Flume Canyon, Goldbar, Hatch Wash, Hatch/Lockhart/Hart, Hells' Hole, Hideout Canyon, Horsethief Point, Hunter Canyon, Labyrinth Canyon, Lost Spring Canyon, Mexico Point, Shafer Canyon, Spruce Canyon, Westwater Creek, and Yellow Bird.	The land use plan makes decisions for new leasing actions. Valid existing rights (previous leases) are recognized regardless of plan decisions.

			The Plan should include the number of leases per area and just the acreage.	
Glen Canyon Group	209	18	Impacts of Mineral Resources: Oil and Gas – Section 4.3.8.2.5.1 Pages 4-117 to 4-129. It is good to know that leases that are not developed or held in production will expire after 10 years under Alternative B. Presuming that the 10-year "clock" began running at the time of initial lease, the plan should include information on each current lease in each of the areas listed above, and the year that lease was granted.	The commentor's suggestion to close all areas currently not leased to new leasing "now" would require a plan amendment to the Grand RMP. The current planning effort is a revision of the Grand RMP. What the commentor requests is basically adopting Alternative B without completing the planning process and proceeding to the Record of Decision, which the BLM clearly cannot do. See also response to comment 124-98.
Glen Canyon Group	209	19	Impacts of Mineral Resources: Oil and Gas – Section 4.3.8.2.5.1 Pages 4-117 to 4-129. BLM should improve their "Preferred Alternative" by reducing the acreage designated Standard stipulation and increasing or stipulating No Surface Occupancy in Coal Canyon, Desolation Canyon, Dome Plateau, Floy Canyon, Hatch Wash, and Lost Spring Canyon. We would like to see Behind the Rocks, Fisher Towers, Goldbar, Hunter Canyon, Labyrinth Canyon, Mary Jane Canyon, Mill Creek Canyon, Negro Bill Canyon, and Shafer Canyon closed to leasing. (We have noted that some of the areas which should be closed are projected by BLM to be low productivity for drilling, but when these leases expire, no new leases should be granted in these sensitive and popular areas.)	Some of the areas mentioned by the commentor would be managed as no surface occupancy for oil and gas leasing in Alt C, the preferred alternative. The BLM must manage for multiple uses, only one of which is the protection of wilderness characteristics.
Glen Canyon Group	209	20	Impacts of Mineral Resources: Oil and Gas – Section 4.3.8.2.5.1 Pages 4-117 to 4-129. Since BLM cannot predict the invention of new techniques for extraction of oil, gas and minerals, areas which do not have existing leases should be closed now, while there is no interest in them, to protect them in the future.	The commentor's suggestion to close all areas currently not leased to new leasing "now" would require a plan amendment. What the commentor requests is basically adopting Alternative B without completing the planning process and proceeding to the Record of Decision, which the BLM clearly cannot do. See also response to comment 124-98.
Glen Canyon Group	209	21	Bottom third of page 4-129 and first paragraph on page 4-130 Comment: We cannot determine where this summary referring to Oil and Gas (Section 4.3.8.2.5.1) belongs. If it is intended to come before, not after Section	The wells referred to for coal-bed methane are included in the projection of oil and gas wells in general on pg. 4-119. The Behind the Rocks area would be managed as no surface occupancy in Alt C, thus prohibiting the disposal

			4.3.8.2.5.2 Coal-bed Methane, then the numbers of wells to be drilled in one and 15 years under each alternative, and the amount of acreage disturbed do not correspond with Table 4.52 on page 4-119. This should be corrected or clarified in the Final RMP. Alternative C should echo Alternative B and limit development of salable materials sites in Horsethief Point and Behind the Rocks.	of salable minerals. The Horsethief Point area would be managed as open with timing limitations, allowing the disposal of saleable minerals within certain time frames.
Glen Canyon Group	209	22	4.3.8.2.5.5 Locatable Minerals (Uranium and Vanadium) Page 4-131 Comment: Map 3-6 displays the presence of uranium/vanadium deposits with development potential. Few permitted mines are shown on the map (mostly in San Juan County), but apparently there are many "prospects" for mines. Although eight of the lands in question are located within areas of moderate potential, there are existing claims in only two of them – Beaver Creek and Goldbar. But there are existing claims in an additional four areas - Floy Canyon, Dome Plateau, Hatch/Lockhart/Hart and Hatch Wash. The Map should display the locations of existing claims.	Utanium and vanadium are classified as locatable minerals. A land use plan cannot withdraw lands from locatable minerals operations. This decision requires the action of the Secretary of the Interior.
Glen Canyon Group	209	23	4.3.8.2.5.5 Locatable Minerals (Uranium and Vanadium) Page 4-131 Under all alternatives, such mines (uranium/vanadium) should not be permitted in Non-WSA Lands with Wilderness Characteristics as they are not permitted in Wilderness Areas.	The BLM cannot withdraw from mining any area unless formally approved by the Secretary of the Interior. To even recommend withdrawal from all area with wilderness characteristics across all alternatives would essentially carry the major management decisions of Alternative B across all alternatives. This would overly reduce the range of options for analysis across the action alternatives. Also see response to comment 209-3.
Glen Canyon Group	209	24	Re: 4.3.8.2.6 Impacts of Decisions, 4.3.8.2.6.2 Alternative B, and 4.3.8.2.6.3 Alternative C, Pages 4-132 to 4-133 Eight prescriptions are provided. The first should be "Visual resource management (VRM) no lower than	To even recommend that all areas with wilderness characteristics across all alternatives be managed as VRM II would essentially carry the major management decisions of Alternative B across all alternatives. This would overly reduce the range of options for analysis

			Class II (see comments regarding Table 4.55 on pages 4-154 through 4-156). These prescriptions should also apply to other popular hiking attractions for local residents and tourists alike. To decrease avoidable impacts, Alternative C should specify ROW exclusion, not just avoidance.	across the action alternatives. See response to comment 209-15 for a discussion of avoidance areas.
Glen Canyon Group	209	25	Re: 4.3.8.2.8 Recreation Decisions – SRMAs, Pages 4-134 to 4-138; also, Volume I, Chapter Two, Table 2.1 Pages 2-2-18 to 2-29. The overall management plan described on page 2-18 and corresponding maps 2-8-B and 2-8-C seem well thought out but much too general. Since all 21 non-WSAs Lands with Wilderness Characteristics and portions of seven others are subsumed within SMRAs , it is imperative that their management needs be specifically and separately addressed.	The purpose of SRMA management is to control and provide for recreation use. The management of non-WSA lands with wilderness characteristics is to protect natural values and to provide opportunities for solitude and primitive recreation. Many of the 21 wilderness characteristics areas do lie within the boundaries of SRMAs. Many of these wilderness characteristics areas are proposed to be utilized for hiking and other non-motorized opportunities. See the discussion of Focus Areas for the recreation management proposed for these areas.
Glen Canyon Group	209	26	Re: 4.3.8.2.8 Recreation Decisions – SRMAs, Pages 4-134 to 4-138; also, Volume I, Chapter Two, Table 2.1 Pages 2-2-18 to 2-29….as stated in line 29 of page 2-18 “where a specific RMZ (or Focus Area) is not identified within an SRMA, the focus of that area is motorized, backcountry touring on designated roads.” Why not make it non-motorized? We are greatly concerned that hiding most of the Non-WSA Lands with Wilderness Characteristics within Special Recreational Management Areas will essentially result in their annihilation.	See response to comment 209-12.
Glen Canyon Group	209	27	Re: The Bookcliffs SRMA, There’s an inconsistency in the RMP/EIS making the Bookcliffs SRMA a non-mechanized focus on page 2-18 (Alternative B) and non-motorized per page 4-135?	This is an error in Chapter 4 and has been changed to read “non-mechanized in both chapters.
Glen Canyon Group	209	28	Re: The Bookcliffs SRMA, We see no reason for Alternative C to designate the Bookcliffs an Extension Recreation Management Area (ERMA) rather than a SRMA since –	The commentor's desire to have the Bookcliffs designated a non-mechanized SRMA in Alt. C is noted.

			according to Chapter four, specific management would be the same, and since BLM would avoid having to amend the Plan at a later date to accomplish this change. (page 4-136 and 4-137)	
Glen Canyon Group	209	29	Re: Canyon Rims SRMA, Focus Area: Scenic Driving Corridors on page 2-19: Defining widths of corridors from the centerline – rather ¼, ½, or 1 mile is arbitrary. These corridors should be based on the unique values in each area, including terrain, visibility, and line of sight of scenic vistas.	A distance was provided as a guideline for VRM II management in the preferred alternative. Controlled surface use would be applied for the widths discussed in each alternative.
Glen Canyon Group	209	30	Re: Colorado Rivers SRMA: Alternative C should be expanded to include the entire Top of the World area and….should protect all 12,510 acres of Negro Bill Canyon as a day-use only area set aside for a hiking and ecological study focus. (Alternative C protects only 8,684 acres – page 2-21.) For boating management in the Colorado River, Two Rivers and Dolores River SRMAs, Alternative C should be the same as Alternative B in stating that no restrictions on private use would be established unless unacceptable resource impacts occur.	The commentor gives no reason why this SRMA should be expanded in Alt C. Also see response to comment 209-3. There is no reason given to restrict Negro Bill Canyon to day use only in Alt C. A sentence has been added to alternatives C and D for these SRMAs stating that no restrictions on private use would be established unless unacceptable resource impacts occur.
Glen Canyon Group	209	31	Re: Labyrinth Rims/Gemini Bridges SRMA: Defining widths of scenic driving corridors from the centerlines – rather ¼, ½, or 1 mile is arbitrary. These corridors should be based on the unique values in each area, including terrain, visibility, and line of sight of scenic vistas.	See response to comment 209-29.
Glen Canyon Group	209	32	Re: Labyrinth Rims/Gemini Bridges SRMA: Alternative C should establish the Tenmile Hiking and Equestrian Focus area; Tenmile Canyon should be closed to motorized use to ensure protection of cultural resources. Gemini Bridges is a world-class arch, one of the best outside the National Parks. Protect it by outlawing all vehicles on the bridge itself. Close and restore damaged lands in the Canyon under Gemini Bridges.	The commentor's preferences are incorporated in Alternative B. The BLM can chose from any of the alternatives in formulating the PRMP/FEIS. Also see response to comment 209-3. The spur route to Gemini Bridges and the bridges themselves have been closed to motorized use under all action alternatives. The route accessing the land beneath Gemini Bridges has been closed to motorized use in all

			(page 2-25)	action alternatives. Restoration of this land is an implementation action and does not require a land use plan decision.
Glen Canyon Group	209	33	Re: Labyrinth Rims/Gemini Bridges SRMA: Dee Pass (Alternative C): The Section 106 cultural resources inventory should be done before, not after, designation as a motorcycle/ATV "specialized sport venue," in order to protect all eligible sites. This should apply to existing and new routes as well as granting permits for competitive events. (page 2-25)	As stated in Washington Office Instruction Memorandum 2007-030, Section 106 cultural clearances are only required for decisions proposing new routes or designating new open OHV areas, neither of which is proposed in Alt C. There is no requirement for a Section 106 inventory for competitive events, unless they fall under the exceptions outlined above.
Glen Canyon Group	209	34	Non-mechanized recreation: Steelbender and Pritchett Canyon should be one-way in order to prevent trail widening and damage to vegetation. (page 2-27)	The action requested by the commentor can be done at the implementation level, should the authorizing officer deem it appropriate. Implementation decisions do not require a land use planning decision.
Glen Canyon Group	209	35	Hidden Valley trail should be hiking only to avoid erosion and user conflicts. The trail is not really conducive to bicycling. This is a favorite hiking trail for visitors and should be maintained solely for tourists and local hikers. (page 2-27)	The BLM monitors the condition of this trail on a regular basis, and has not noted any degradation of the trail which is attributable to mountain bike use. The BLM has not received complaints regarding user conflicts between bicyclists and hikers. The trail could be closed to mountain bike use should such use be determined to impair wilderness character. This action could be undertaken under the Interim Management Policy for Lands Under Wilderness Review. It does not require a land use planning decision.
Glen Canyon Group	209	36	The descriptions of all of the potential ACEC's carry the disclaimer that "The occasional presence and noise of OHV use would reduce opportunities for solitude and conflict with primitive forms of recreation." While this is unfortunately true, we expect BLM to develop and implement approaches to eliminate this problem. If the noise of OHV's continues to disturb users, one possibility would be noise limitations in the form of mufflers especially on motorcycles.	The BLM is required to prepare plans subsequent to signing the Record of decision for the RMP to protect the relevant and important vales associated with any specific ACEC. Opportunities for solitude and primitive forms of recreation are not a relevant and important value for any ACEC, and management of these areas would not address the noise issue raised by the commentor. Noise restrictions on mufflers are beyond the scope of the DEIS/RMP. See response to comment. See response to comment 122-7.
Glen Canyon Group	209	37	Re: Highway 279/Shafer Basin/Long Canyon Potential ACEC In addition to managing rock art for public use with	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM's ACEC Manual (1613) requires that all potential

			interpretation, the BLM should acknowledge the national significance of the Wall Street Rock Art Site by preparing a National Register Nomination.	ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/DEIS. Alternative B analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The analyses that will provide the rationale for the final decision to designate or not designate an ACEC can be found in Chapter 4 of the PRMP/FEIS. See also response to comment 124-5.
Glen Canyon Group	209	38	The BLM should acknowledge the national significance of the Wall Street Rock Art Site and rock art sites within Mill Creek Canyon by preparing National Register Nominations.	In keeping with the National Programmatic Agreement and individual state BLM/SHPO protocol agreements, the BLM invites SHPO, public, governmental and Native American participation in all planning efforts. According to the BLM's planning handbook (BLM-H-1601-1), nominating cultural sites to the National Register of Historic Places is not a land use planning decision and is therefore outside the scope of this EIS.
Glen Canyon Group	209	39	Re: Ten Mile Wash Potential ACEC Furthermore, there should be no vehicular travel in Ten Mile at all under any alternative because speed limits cannot be enforced and because it has proven impossible to keep vehicles out of side canyons. For example, repeated re-signing of Trough Canyon has been ineffective. We have hiked the area several times and have seen motorcycle tracks up and down Trough as well as downed signs.	See responses to comments 124-38, 122-18 and 124-21.
Glen Canyon Group	209	40	No new motorized or mechanized travel routes should be established within the Canyon Rims potential ACEC. All or portions of several potential ACECs should undergo a Class III cultural resources inventory. These potential ACECs include Behind the Rocks, Bookcliffs, Mill Creek Canyon, and Upper Courthouse.	This area is limited to designated routes under all alternatives. Identifying any additional routes could be done on a site-specific basis in the future, and would require site-specific environmental analysis. The Canyon Rims Recreation Area Management Plan does not call for new OHV routes in this area. A Class III inventory is not required as part of the ACEC identification or designation process. ACEC designation

				is sought to protect areas of high cultural occurrence. The BLM may prioritize certain ACECs (or other designations) for a Class III inventory, but the inventory itself is not a planning decision.
Glen Canyon Group	209	41	Re: White Wash Potential ACEC …however, we suggest that the BLM retain the option of closing the White Wash Sand Dunes to open use if damage is occurring to the riparian dune system and/or if OHVs are damaging resources outside the open use area. Its proximity to Ten Mile leads to vehicles – especially ATVs, crossing over into more fragile areas. (pages 2-38 and 2-39)	The BLM can change the OHV designation for White Wash from “open” to another category (such as “limited”) if conditions warrant, although such an action would require a future plan amendment.
Glen Canyon Group	209	42	Re: 4.3.8.2.13.1 OHV Travel Management Pages 4-146 thru 4-152, Table 4.5, Page ES-6 This section is very hard to fathom as the frame of reference changes back and forth from acres to miles of routes. Who can understand Table 4.54 (page 4-146 and 4-147) when it seems that Alternatives B, C, and D are identical with the sole exception of Long Spring Canyon? Also, the Table may be meaningless anyway because it does not define “limited.” It would have been meaningful if it had been presented as was done in Table ES1 by categories: Closed, Limited to Existing, Limited to Designated, and Open. Does the BLM intend to mean “Limited to existing/designated routes,” per summary Table 4.59 on page 4-164.	The “frame of reference” changes in the DRMP/EIS from acres to miles of routes because the BLM is required in planning to designate all areas of the planning area as “open”, “limited”, or “closed”. Within the “limited” category, the BLM is encouraged to identify which routes are available for motorized use. These are separate, but related, planning decisions. The commentor is correct in noting that, for most areas in Table 4.54, the acreages are the same across all action alternatives. This is discussed explicitly on page 4-149. The data for Lost Spring Canyon in Table 4.54 is incomplete; alternatives C and Have the same acreage in “limited as in alternative B, and this has been corrected. The term “limited” means “limited to designated routes” for all action alternatives. This is explicitly stated on page 2-48. Table 4.59 includes the “no action” alternative; hence, the use of the label “Limited to existing/designated routes”.
Glen Canyon Group	209	43	Re: 4.3.8.2.13.1 OHV Travel Management Pages 4-146 thru 4-152, Table 4.5, Page ES-6 The paragraph on page 4-149 of impacts common to the “action alternatives” (B, C, and D) states that game	Page 2-48 states under Management Common to All Action Alternatives: “Adherence to the Travel Plan is required for all activities, except where otherwise explicitly permitted”.

			retrieval and antler collection must be done on foot, that vehicles are not permitted to go off designated routes for “such activities.” What about rock collecting, gathering wood, etc? This paragraph should state that cross country travel for any activity would be impermissible.	
Glen Canyon Group	209	44	Re: 4.3.8.2.13.1 OHV Travel Management Pages 4-146 thru 4-152, Table 4.5, Page ES-6 The paragraph beginning at the bottom of page 4-149 also apparently contains an error. Clearly, it means that OHV use will be limited to designated, not existing, routes. The same error is found in the last paragraph on page 4-150. Under all of the action alternatives, vehicles must stay on designated routes.	The commentor is correct, and the wording has been changed to “designated”.
Glen Canyon Group	209	45	Re: 4.3.8.2.15 Visual Resource Management Pages 4-154 thru 4-158, Table 4.55 Regarding VRM decisions reflected in Table 4.55, we reiterate that the Non-WSA Lands with Wilderness Characteristics must be protected to permit future Congressional consideration as designated wilderness; this means that the preferred alternative should re-designate all areas as VRM I or II, allowing no more than minor changes to landforms and vegetation. Permitting major modifications (VRM IV) in Coal Canyon, Floy Canyon and Flume Canyon is clearly incompatible with Handbook dictates.	The commentor is essentially asking the BLM to manage all of these areas to protect wilderness characteristics in Alternative C, and to basically the same degree as in Alternative B. The commentor also asks the BLM to manage these lands in such a way as “to permit future Congressional consideration as designated wilderness.” This is essentially the non-impairment standard applicable only to Wilderness Study Areas. See response to comment 124-53 for a discussion of BLM’s obligation to manage lands for wilderness characteristics.
Glen Canyon Group	209	46	Re: Summary Pages 4-162 thru 4-168 Summary tables 4.57 through 4.60 cover some, but not all, aspects of such surface disturbing activities affecting the 266,485 acres. Examples of these activities under BLM’s preferred alternative: 1) 160,599 acres – 60%, of Non-WSA Lands with Wilderness Characteristics would be open for ROW’s (pages 4-114 and 4-115, Table 4.48); 2) 225 acres would be open to coal bed methane development (page 4-129); 3) Horsethief Point and Behind the Rocks would be vulnerable to mining of salable minerals (sand and	See response to comment 124-53. The fourth sentence in paragraph 1 of page 4-143 has been changed to state: “…same as in Alternative B.”

			gravel, building stone) (page 4-131); 4) No portions of ten areas would be designated SRMA's, and four would not be covered by either SRMA's or ERMA's (pages 4-136 and 4-137); and 5) most would not be within designated ACEC's (pages 4-140 thru' 4-144). (Incidentally, there appear to be errors and/or muddied discussion in the first paragraph, sentences 3 and 4, of page 4-143 attributing to Alternative C comments which apparently refer to another alternative.)	
Glen Canyon Group	209	47	Re: Summary Pages 4-162 thru 4-168 The VRM table (Table 4.58) is incorrect in showing 0% Class I in Alternative B, while Table 4.55 designates some Class I in Beaver Creek, Behind the Rocks, Dead Horse Cliffs, Dome Plateau, Goldbar, Gooseneck, Horsethief Point, Hunter Canyon, Labyrinth Canyon, Mary Jane Canyon, Mill Creek Canyon, Negro Bill Canyon, and Westwater.	The commentor is correct. There are 45,048 acres of non-WSA lands with wilderness characteristics that are designated as VRM Class I in Alt B. The designation is for other reasons, usually the establishment of an ACEC. Table 4.58 has been corrected to show that 45,048 acres are VRM Class I (17%) in Alt. B, while 221,437 acres are VRM Class II (83%) in Class B.
Glen Canyon Group	209	48	Re: Summary Pages 4-162 thru 4-168 Finally, in regard to Table 4.60 which lists 161,327 acres or 61% of woodland acres open to harvest under C, we direct BLM to correct errors on page 4-162 noting that "in the 165,984 acres that remain open for wood-cutting (and where the resource exists), wilderness characteristics may be compromised by surface disturbing activities such as driving cross-country to the trees…"	Driving cross-country in pursuit of wood-cutting activities would be illegal under all action alternatives except in areas designated as "open to OHV use". The areas the commentor describes are all in the "limited to designated routes" category under all action alternatives. See response to comment 209-43.
Glen Canyon Group	209	49	The RMP needs to contain monitoring stipulations which at a minimum contain the following: annual monitoring with photos, mile sections of road with the number of motorized tracks leaving the road, width of road, status of signs (shot, missing, down, defaced). Among actions which could be instituted are: one way travel, noise limitations (muffles), permits with maximum number of vehicles, closed during certain times of the season, closed to recover, closed permanently.	The establishment of monitoring stipulations is not a land use planning decision. The BLM will determine on a site-specific basis the level of monitoring required, and the appropriate response to the information gathered. The commentor provides no evidence to support specific monitoring measures as the only acceptable method.
Glen Canyon Group	209	50	Any route or segment of route which cannot be monitored by BLM should be closed.	See response to comment 209-49.

Glen Canyon Group	209	51	It is understood that only having two BLM rangers is not sufficient for 1.7 million acres. BLM needs to pursue some sort of in-the-field monitoring in highly used areas. People are more likely to behave when there is an official presence (law enforcement or not) then when no one is around.	See responses to comments 124-21 and 124-38.
Glen Canyon Group	209	52	Another area in which the RMP is very weak is how the Travel Plan is going to be implemented. We urge BLM to include in the RMP step they will take to ensure that vehicles stay on designated roads. One rule that could be instituted is: every road is closed unless there is a sign marking it open. Manpower to do this would come from many organizations when they find out that their travel is limited only because signs are not installed. Also, routes that are dead-end should be signed dead-end at the beginning, and the turnaround should also be signed.	See response to comment 120-96.
Glen Canyon Group	209	53	Re: 4.3.22.8 Non-WSA Lands with Wilderness Characteristics Pages 4-494 and 4-495 This section portends many more “costs” than “benefits”, especially in the long-term, which is defined as the 15-20 year life of the Plan. Only prescribed fire for vegetation treatments, and construction of riparian fences or new water developments would enhance the natural character of Non-WSA lands in the long-term. All other uses would “degrade” – in BLM’s terms, wilderness characteristics. To be honest, BLM should admit that these developments/uses would destroy wilderness characteristics, making them ineligible for wilderness designation, not just in the long term, but forever.	The BLM does not deny the negative impacts to these lands under certain alternatives. These impacts are stated explicitly in the section to which the commentor refers. The negative impacts are also included in the discussion of the impacts to wilderness characteristics from the various alternatives throughout Chapter 4. The BLM is not required to manage these lands under all alternatives to protect wilderness characteristics, let alone manage then according to the non-impairment standard required for Wilderness Study areas. See also response to comment 124-53.
Glen Canyon Group	209	54	Re: 4.3.23.6 Non-WSA Lands with Wilderness Characteristics, Page 4-504 According to this section, the analysis of Cumulative Impacts “includes all Federal with wilderness characteristics in Utah that are currently being managed for management of wilderness characteristics to protect	The commentor’s assertion that the referred quote includes non-WSA lands with wilderness characteristics is incorrect. The BLM is unaware of any law or administrative action that that requires this type of management. See also responses to comments 209-53 and 124-53.

			those values." That is, it includes designated wilderness, WSAs and Non-WSA lands with wilderness characteristics, all of which are protected by law or administrative decision. Alternative B would protect a total of 5,932,521 acres or about 4.5% of the statewide total. Alternative C by contrast would protect only 0.8% - less than one per cent of the statewide total acres which are, in BLM's words quoted above, currently being managed for management of wilderness characteristics. The Interim Management Plan for Lands Under Wilderness Review (IMP) should thus govern all of these areas under all – or at least all action, alternatives. As stated in Appendix P, the current Land Use Planning Handbook (H-1601-1, 2005) BLM land use plans must avoid or minimize impacts to wilderness characteristics. Alternative C is incompatible with this charge.	
Glen Canyon Group	209	55	Re: Glossary Pages X-29 thru' X-42 The Glossary is not comprehensive. For example, "way" is defined, but "route" are not. "Mechanized" and "non-mechanized travel" are not defined at all. Attachment A of Appendix G includes additional terms which should be justified with Glossary definitions and/or referenced in the Glossary. It is possible that there are definitions in other appendices or the text of the document itself which, if added to the Glossary, would make it more user friendly.	The BLM has added the referenced words (route, mechanized and non-mechanized) to the glossary. The BLM would need more specifics to address the other glossary changes which the commentor recommends.
Glen Canyon Group	209	56	Re: INDEX Pages X-43 thru' X-46 We cannot discern the criteria used by BLM to decide on which terms to index and which to ignore. The various species of fish and wildlife are indexed. The names of creeks and canyons: of potential ACEC's, SRMA's, and WSA's: and of state/federal agencies are indexed. Non-WSA Lands with Wilderness Characteristics are not. All told, it is of limited helpfulness.	The index is not intended to be complete, but rather helpful to the reader.
Glen Canyon	209	57	Re: Socioeconomic Resources Pages 3-95 thru 3-118,	The BLM is aware of these other data sources, but

Group			4-252 thru 4-277, 4-49 and 4-507 The population data, along with other demographic and housing data in Chapter Three are taken from the 2000 Census, as analyzed by the Sonoran Institute. Had BLM consulted the Utah Governor's Office of Planning and Budget, they could have considered, as well, reliable estimates for year 2005 and projections to 2015 and 2025 for Grand and San Juan Counties. The Governor's Office also makes estimates and projections for employment figures.	incorporating them in the document would make no difference in the impact analysis. This is because growth projections for both Grand and San Juan Counties are well below the projections for Utah as a whole. For example, the growth rate in Grand County is projected at below one percent annually (0.85%) from 2000 through 2025, which is less than half the projected rate for the state of Utah. In terms of population density, Grand and San Juan counties would still have very low population densities by both state and national standards.
Glen Canyon Group	209	58	Re: Socioeconomic Resources Pages 3-95 thru 3-118, 4-252 thru 4-277, 4-49 and 4-507 …the population increases of concern are not of the resident populations of these two counties, but the fast growing Wasatch Front of Utah and all parts of Colorado. According to the National Visitor Use Monitoring study conducted by the MFO in fiscal year 2006, these are the sources of most travelers to the Moab District. The single zip code with the greatest number of visitors, 82, was 84532 which is Grand County. There were an additional 117 from other parts of Utah principally the Wasatch Front. But even more than Utahns were Colorado visitors – there were 210 of them. They come for fun and recreation, for refuge and relaxation, for peace and quiet. Some observers contend that displacement would occur if there were tighter restrictions on OHV travel in the MFO. We would argue that such displacement has already taken place, but in reverse – I.e., tighter restrictions in Colorado have led to their visiting Utah for cross country and other off-highway activities.	The BLM does not dispute the potential growth rates for the Wasatch Front or Colorado Front Range areas. The BLM does not disupte that these areas will continue to provide visitors to the Moab area. The commentor provides no evidence to support the assertion that displacement of OHV users from Colorado to the Moab area has occurred due to tighter restrictions on OHV use in Colorado. Even if this were the case, the action alternatives in the DRMP/DEIS greatly reduce the acreage open to OHV travel, as well as the miles of routes identified for motorized use. To the extent that Colorado visitors come to the Moab area for the types of quiet recreation the commentor describes, the action alternatives should provide more of these opportunities.
Glen Canyon Group	209	59	Re: Socioeconomic Resources Pages 3-95 thru 3-118, 4-252 thru 4-277, 4-49 and 4-507 Chapter four shows relatively few if any differences among alternatives in Socioeconomic impacts, whether beneficial, adverse, or unspecified. No differences were projected in Environmental justice, PILT payments,	The commentor reiterates the BLM's findings and does not suggest any errors in data or analysis. The BLM concurs.

			Population, Fire management, Health and safety management, Lands and realty, Locatable minerals, Salable minerals, Paleontological resource decisions, Riparian decisions, Soil/Watershed, Wilderness Study Areas and Wilderness areas, Special status species, Vegetation decisions, and Woodland decisions.	
Glen Canyon Group	209	60	Re: Socioeconomic Resources Pages 3-95 thru 3-118, 4-252 thru 4-277, 4-49 and 4-507 We were struck by the conclusion in this section comparing Alternatives B and C that "adverse social and economical impacts as a result of decreases in OHV use are not likely regardless of alternative selected." This contrasts with the section on Recreation and Travel, in which they postulated that such a decrease under Alternative B would reduce tax revenues to local governments. This comes with the caveat, however, that it is impossible quantify the proportions of recreational expenditures which are attributed to resident consumers versus non-recreational consumers. (page 4-269) There also socio-cultural and technological trends which impact planning and which BLM did not consider such as inter-peer texting, promotion of more "fun" and capable motor vehicles, or, conversely, a greater concern for the environment by a younger generation.	The BLM's discussion to which the commentor refers is heavily qualified, due to the lack of available data on which to project economic impacts from changes from recreation patterns under the various action alternatives. On pg. 4-269 of DRMP/EIS, the BLM argues that should OHV use decline in the planning area, it is possible that there could be a decline in local revenues. The BLM does not state that such a decline is likely, which is consistent with the statement quoted by the commentor. The BLM agrees with the commentor that there are likely to be a large number of socio-cultural and technological developments which the plan does not (and cannot) consider. Many of these are so speculative as to make their inclusion and subsequent impact analysis equally speculative. A recent (February, 2008) publication of the National Academy of Sciences, for example, showed a very large decline in the pursuit of certain outdoor recreational activities, and postulates that a cause may be the increasing popularity of the electronic media, especially video gaming. The BLM believes that that these trends are almost impossible to predict, let alone quantify. Over the life of the plan there will likely be other developments of which no one is currently aware.
Glen Canyon Group	209	61	Re: Climate change The other big-enormous, really, consideration which lies outside the RMP/EIS planning process is the undeniable reality of global warming. By all reliable measures, the pace is quickening. Planning for the condition of our environment 15 or 20 years down the road must take into account the certainty of drought,	See response to comment 124-115.

			scarcity of resources, and changes in energy production and consumption, as well as related and resultant changes in political environment.	
Blueribbon Coalition, Inc.	211	1	White Wash Dunes Management Plan is unacceptable.	This comment represents the opinion of the commentor. For specific information on White Wash, see response to comments 120-83, 123-10 and 123-35.
Blueribbon Coalition, Inc.	211	2	Please keep the Thompson Loop and Tenmile Wash trails open. They are both widely enjoyed by me, and my friends and family.	See response to comment 122-29 for the Thompson Trail. Tenmile Wash is open to motorized travel in Alts A, C and D.
Blueribbon Coalition, Inc.	211	3	There needs to be a mechanism for new trails and also provisions for competition use trails.	See response to comments 122-15 and 122-30.
Blueribbon Coalition, Inc.	211	4	Many of these areas have been in use for many years by ranching, motorized groups and industries. You are “closing” routes, areas and trails by not including them in your Alternatives.	See response to comment 208-2.
Blueribbon Coalition, Inc.	211	5	Fee system when not in existence starts a plethora of problems for everyone.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	65	I would like for you to consider designating more ATV trails, especially between White Wash and Red Wash.	See response to comment 122-15 and 122-30.
Blueribbon Coalition, Inc.	211	66	Please keep the Gemini Bridges road open. The natural stone bridges are awesome. I would like to be able to ride the Thompson trail and Copper Ridge loop in the future.	See response to 211-55.
Blueribbon Coalition, Inc.	211	67	I also oppose the fee system in C and D alternatives. If existing funding will not cover needs, then any fee system should be managed by all affected, including the public using those areas.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	68	I oppose the fee system proposed in Alternatives C and D. Fee systems are unpopular with public land users.	See response to 123-10.
Blueribbon Coalition, Inc.	211	69	Requiring fences around cottonwood trees is impractical and not a good idea.	See responses to 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	70	BLM’s open areas should be located along existing boundary roads of Duma Point, Ruby Ranch, Blue Hills road.	See response to comment 123-35.
Blueribbon Coalition, Inc.	211	71	The FEIS should designate more ATV trails, between Ruby Wash and White Wash.	See response to comments 122-15 and 122-30.

Blueribbon Coalition, Inc.	211	72	I oppose this camping policy as contained in Appendix E. Further – I support keeping existing campsites open unless closure is accomplished via lawful public planning process.	See response to comment 123-8 and 120-86.
Blueribbon Coalition, Inc.	211	73	Limiting camping to one small designated area in the RMP is not wise not needed.	Camping is not limited to one small area in any of the alternatives to the DRMP/EIS.
Blueribbon Coalition, Inc.	211	74	The White Wash area that is open is too small. The White Wash ACEC is not appropriate. I strongly oppose ACEC Alternative B.	See response to comment 123-35.
Blueribbon Coalition, Inc.	211	75	I oppose closing “the Dunes” to motorized travel as proposed in Alternative B.	The opinion of the commentor is noted.
Blueribbon Coalition, Inc.	211	76	Please keep existing riparian washes open.	See response to comment 122-14.
Blueribbon Coalition, Inc.	211	77	Keep the Copper Ridge loop and Thompson trail open as proposed by Ride with Respect.	See response to comments 122-29 and 122-36.
Blueribbon Coalition, Inc.	211	78	Keep open the last bit of the Gemini Bridges road. I look forward to being able to drive across a natural bridge.	See response to comment 206-14.
Blueribbon Coalition, Inc.	211	79	Although there are many ATV roads open on BLMs travel plan some motorcycle routes should be introduced as ATV routes as well.	See response to comment 120-90.
Blueribbon Coalition, Inc.	211	80	The FEIS should consider designating more ATV trails, especially between White Wash and Red Wash.	See response to comments 122-15 and 122-30.
Blueribbon Coalition, Inc.	211	81	…most of all these roads being closed off are places that the will always exist because of the use of these roads in the past.	See Appendix G of the DRMP/EIS for a description of the Travel Plan alternative formulation process. See also response to comment 208-2.
Blueribbon Coalition, Inc.	211	82	…in White Wash fencing the Cottonwoods doesn’t make any sense to much of an expense to all of us.	See response to comments 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	83	I oppose the camping policy because there are no lists of how many camp sites there are going to be for motorized usage, you cannot park in the road and block it. I believe that we need all campsites left open that exist and are legal campsites.	See response to comment s123-8 and 120-86.
Blueribbon Coalition, Inc.	211	84	I also believe all right-of-ways that would qualify under Rs 2477 remain open and any law under Utah Revised statute.	See response to comment 120-16.
Blueribbon	211	85	The fee system proposed in Alternative C and D are not	See response to comment 123-10.

Coalition, Inc.			only unnecessary but in opposition to federal regulations concerning public use fees.	
Blueribbon Coalition, Inc.	211	86	The notion of fencing trees and water sources is both impractical and unnecessary .	See response to comments 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	87	Another area that we use at present is the Rabbit Valley – Westwater area. It is close to Grand Junction and has long been a multiple use area. No changes in the area are necessary.	See response to comment 122-39. This area, called Utah Rims, is proposed as an SRMA to enhance route opportunities in the preferred alternative.
Blueribbon Coalition, Inc.	211	88	The Yellow Cat area is an area that is very conducive to motorized recreation and multiple use.	See response to comment 122-38. All travel in the Yellow Cat area would be in accordance with the Travel Plan in the preferred alternative.
Blueribbon Coalition, Inc.	211	89	The existing campsites should remain open and available unless closure is through lawful planning process.	See response to comment 123-8.
Blueribbon Coalition, Inc.	211	90	The triangle area on Glade park should remain open to allow public access to the west end of Pinyon Mesa.	The "Triangle" area is proposed to be limited to designated roads and trails under all action alternatives. The commentor should specify exactly which route he is referring to.
Blueribbon Coalition, Inc.	211	91	As for the White Wash Sand Dunes I believe that fencing the cottonwoods and water sources is impractical.	See response to comments 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	92	Alternatives C and D open areas should be expanded with no fees imposed for usage.	See response to comments 123-10 and 123-35.
Californians For Western Wilderness	952	1	It is a travesty that the BLM is releasing six RMP for the state within a short period of time, expecting the public to be able to comment on them in any meningful way, and only giving 90-day periods for each, with the comments periods all overlapping. This violates the spirit of the National Environmental Policy Act (NEPA). The scoping period for the Plan was something like 8 months. A similar time frame should have been established to comment on the _____ we urge you in strongest terms to re-open or extend the comment period now. Otherwise BLM's actions come across as being crass political ploy, despite State Director Sierra's comments to the Salt Lake Tribune to the contrary.	See response to comment 124-1.

Californians For Western Wilderness	952	2	Plan C is supposedly the most balanced plan, according to the executive summary. Balanced with regard to what? Most scoping comments came from people who favored quiet recreational uses: hiking, rafting & canoeing, photography, rock are viewing, rock climbing. That is the makeup of the majority of visitors to the Moab area. Yet the plan gives weight far out of proportion to their number to the interests of off-highway vehicle users and energy companies. If BLM had consulted its own surveys of users it would have seen how the numbers came out. Quiet recreationalists make up the huge majority of users in the Moab area. There cannot be any simultaneous use of an area by quiet recreationalists and OHV users. The OHV users will win out every time, since people who go to enjoy nature's quiet and wildlife will not go to areas where OHV use allowed. The noise is incredibly disturbing.	The DRMP/EIS presents four alternatives which seek to balance competing resources and uses. Alt C balances the needs of motorized and non-motorized users by providing Focus Areas for the needs of both groups. The Travel Plan accompanying the RMP removes 2,500 miles of existing routes from designation, and reduces by 600,000 acres the lands open to cross country motorized travel. For discussion of the noise of OHV's, see response to comment 122-7.
Californians For Western Wilderness	952	3	The Southern Utah Wilderness Alliance estimates that south of Interstate 70, 84% of the land that BLM manages will be within 1/2mile of a designated OHV route. This is incredible and unconscionable. And this doesn't even address the well-known environmentally damaging consequences of OHV use: erosion, crushed wildlife, pollution of streams, destruction of plant life and cryptobiotic crusts.	The Travel Plan accompanying Alt C of the DRMP/EIS eliminates close to 3,000 miles of existing route; in addition, the DRMP/EIS eliminates cross country motorized travel on all but 2,000 acres. See Appendix G for details of how the Travel Plan was formulated.
Californians For Western Wilderness	952	4	Thus it is inexplicable that the Plan fails to offer protections to those areas that both citizens of Utah and BLM itself have identified as having wilderness character. These include Labyrinth Canyon, areas near Fisher Towers, and the Dome Plateau.	The DRMP/EIS provides protections to many lands in the Moab planning area. The prime mechanism for doing this is the imposition of a no surface occupancy stipulation for oil and gas leasing and other surface disturbing activities. Areas that are protected in this fashion include Labyrinth Canyon of the Green River, the entire area near Fisher Towers and the riverside portions of the Dome Plateau. In Alt C, Fisher Towers is proposed to be managed to protect its wilderness characteristics.
Californians For Western	952	5	Instead, the Plan authorizes over 2,600 miles of OHV routes in areas that have wilderness character,	The full sized vehicle routes designated were not illegally made, but are rather constructed routes from the minerals

Wilderness			including areas determined by the BLM to have such character. This is unconscionable. BLM and all the federal land management agencies find themselves strapped when it comes to their budgets, especially budgets for enforcement. It's not clear from the draft how the Moab office will police these routes to ensure that unacceptable damage is not being caused by OHV use. The better alternative would be not to authorize them in the first place. Especially, the office should not authorize any routes that were created by already illegal use. This merely serves to reward the illegal use.	exploration and ranching periods. While over 2,600 miles of route are authorized, an addition 2,600 miles of route are not be designated in the Moab RMP. The routes created by motorcyclists, while user made, were largely made in areas open to cross country travel, thus making the routes legal. The BLM assumes that it will have the resources necessary to implement the plan, including the Travel Plan.
Californians For Western Wilderness	952	6	Back when the lawsuit settelment was enterend into between then- Secretary Gale Norton and the State of Utah regarding BLM's wilderness inventories it was widely stated by officials at the Interior Departement and in the BLM tha the settelment did not preclude protecting areas with wilderness character. So far, BLM has ____ itself of doing that, and this plan reinforces that perception. Lands in the Moab district with wilderness character and that are included in America's Red Rock Widerness Act should be protected as such until Congress decides to act.	The BLM has chosen to protect some of the lands referred to by the commentor. Some of these lands are protected by managing them for wilderness characteristics; others are protected through ACEC designation, and others are protected by imposing a no surface occupancy stipulation in Alt. C. See Chapter 4 of the DRMP/EIS for an analysis of the impacts to lands with wilderness characteristics from the varying alternatives.
Blueribbon Coalition, Inc.	211	6	Camping is a big issue. You show a lack of areas to camp for motorized, but plenty for non-motorized. Is this intentional or an oversight? Where are we supposed to camp? In the middle of roads?	Access to dispersed campsites was considered as a purpose and need for keeping spur routes open. Cross country travel to access campsites is not allowed in areas limited to designated (or existing) routes. Parking in association with dispersed camping may occur on designated routes, or alongside the designated route in previously disturbed areas. See also responses to comments 123-8 and 120-86.
Blueribbon Coalition, Inc.	211	7	Issue – USEA conflict proposal to create exclusive use zones. The final document should not use the term exclusive use zone. This will only create conflict where little or none has existed in the past.	There are no exclusive use zones proposed in the DRMP/EIS. Focus Areas (see definition on p. 2-18 of the DRMP/EIS) are those in which certain types of recreation are encouraged and provided for. All use of all Focus Areas is to be consistent with the Travel Plan.
Blueribbon Coalition, Inc.	211	8	Issue – Special Recreation Management Area: If SMRA are to be used there are several that need to be	See response to comment 122-39.

			expanded. The Utah Rims area needs to be interlaced with Rabbit Valley in Colorado since most of the trails start in Colorado it only makes sense to have only one staging area. The trails of this area should extend further west to include Mel's Loop.	
Blueribbon Coalition, Inc.	211	9	Issue: Some important motorcycle trails are missing from all of the alternatives. Specifically the Copper Ridge Trail should connect to the Thompson Trail. Non-riparian washes should be included in the plan. Additional inventories should be allowed and considered for implementation.	See response to comment 122-36 for discussion of the Copper Ridge route. See response to comment 122-14 for discussion of riding in washes. See response to comments 122-15 and 122-30 for a discussion of adding routes.
Blueribbon Coalition, Inc.	211	10	Issue: Keep White Wash Sand Dunes open. This is an area that has been a very popular area for all people to enjoy. There is not a weekend that goes by that people are not out there enjoying the experience. This is an area that restores itself and should remain as an open area.	White Wash is open in the preferred alternative, Alt. C. In addition, the open area has been expanded to the west to accommodate dispersed camping (see response to comment 120-83).
Blueribbon Coalition, Inc.	211	11	Issue: Trails for competitive use. There is no allowance for competitive events in this area. This absolutely should be allowed on designated routes. The routes should be flexible to allow for connections and loops.	See response to comment 208-7.
Blueribbon Coalition, Inc.	211	12	My first comment regarding your RMP concerns fees. I am definitely opposed to fees.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	13	The White Wash Sand Dunes management does not seem workable. How can it be practicable to fence each cottonwood tree? It would make more sense to put up signage so that users know to stay away from certain areas.	See response to comments 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	14	I oppose the BLM fee system in Alternative C and D. Public land should be free for all. Putting fences around trees is impractical.	See response to comments 123-10, 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	15	Please do not use these issues to effectively close down public land recreation areas such as White Wash Sand Dunes!	White Wash Sand Dunes are open to cross country travel in Alts. C and D.
Blueribbon Coalition, Inc.	211	16	I love to go jeeping in the White Wash Sand Dunes so I would hate to see it closed to us and everyone else who	See response to comment 211-15.

			wheels there.	
Blueribbon Coalition, Inc.	211	17	One of our favorite riding areas is the White Wash Sand Dunes are near Green River. We understand that there is currently a review being done and policy being set for the White Wash area. We are concerned about the proposed fees that maybe charged for the area. We feel that the regulations of the law should be followed involving public input, also, any fees if charged should be used to improve the area and not taken out and used some where else.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	18	Keep Gemini Bridges road (the stone bridge) open.	See respone to comment 206-14.
Blueribbon Coalition, Inc.	211	19	Keep the Thompson Trail and the Copper Ridge Loop as proposed by ride with respect.	See response to comments 122-29 and 122-36.
Blueribbon Coalition, Inc.	211	20	Ten Mile Wash, a popular area, should be accessible from the dunes area and open to the river, areas that have been in use for years should remain open.	Routes are available in all action alternatives of the Travel Plan to enable motorized users to access the dunes area from Ten Mile wash. Ten Mile wash itself remains available for motorized travel on the designated route in Alt. C.
Blueribbon Coalition, Inc.	211	21	We are opposed to the fee system proposed in Alternative C and D. Fees are always unpopular. The White Wash Sand Dune management plan is unacceptable and unworkable. Special permits are unlawful. Any fee system should require involvement of affected user groups.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	22	The proposed fencing around cottonwood trees and water courses is not feasible. The young cottonwoods/water sources vary with the precipitation in the area – in wet years, fencing will be dangerous and impossible to maintain.	See response to comments 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	23	The three alternatives aren't much different from each other. Alternative D fails to provide true motorized focus and renders Rabbit Valley/Westwater non-motorized. This area is a very important area for motorized users from western Colorado.	Alternative D does not identify Utah Rims (which is the Utah side of Rabbit Valley) as an SRMA with a motorized focus. Travel would remain available in Utah Rims in accordance with the Travel Plan accompanying Alt. D.
Blueribbon	211	24	In the Moab BLM's travel plan some ATV trails are not	See response to comment 120-90 for a discussion of

Coalition, Inc.			proposed as open and some of the motorcycle routes should be designated ATV trails as well. More ATV trails are needed in White Wash and Red Wash and we suggest looking closely at the plan.	ATV vs. motorcycle routes. See response to comments 122-15 and 122-30 for a discussion of adding new routes subsequent to the RMP.
Blueribbon Coalition, Inc.	211	25	Campground/campsites are being closed by the BLM. Designated campsites and more of them will control and encourage proper usage of BLM sites.	See response to comments 123-8 and 120-86 for a dicsussion of dispersed camping.
Blueribbon Coalition, Inc.	211	26	We have no objections to multiple use of most trails but realize mountain bike trails are in short supply. Mill Canyon – Sevenmile Rim biking areas should be expanded and the travel plan should extend the south Spanish Valley bike area further south toward Black Ridge if possible.	See response to comments 122-34 and 122-43..
Blueribbon Coalition, Inc.	211	27	We honor “travel limited to designated roads, trails, and areas” wherever we ride but feel some areas could be expanded such as the White Wash open area and the Sand Flats recreation area.	The White Wash open area has been expanded slightly to accommodate a popular hill climb and camaping area. See response to comments 122-42 and 123-35 for a further discussion of expansion of open areas.
Blueribbon Coalition, Inc.	211	28	Please keep the following routes open – Gemini Bridges, the Thompson trail and the Copper Ridge Loop (Ride with Respect) and Ten Mile Wash – we have ridden these trails for many years and feel they should remain open.	See response to comments 206-14 (Gemini Bridges), 122-29 (Thompson Trail), 122-36 (Copper Ridge Trail) and 211-20 (Ten Mile Wash)
Blueribbon Coalition, Inc.	211	29	I am totally opposed to the fee system that is being proposed for the White Wash Sand Dunes without input from the public.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	30	As for camping with trailers, you have not allowed enough area for Holiday camping and not camping 5 feet from their neighbors. You have more camp areas for tent campers.	See response to comments 120-83, 123-8 and 120-86. The BLM is unaware that there is a bias toward tent campers in the DRMP/EIS.
Blueribbon Coalition, Inc.	211	31	I also disagree with the fee areas there. I am not sure this fee system is explained fully in the proposal. Is the fee system proposed for the need to limit use? Or is there a need for funding for the proposed fencing project?	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	32	Fencing the trees off is not a practical or feasible solution to the problem. If the wet areas and trees are	See response to comments 208-3 and 479-6.

			fenced off there will be an ugly maze of dangerous fences in the area. To protect young trees, if that is the purpose, other options should be considered.	
Blueribbon Coalition, Inc.	211	33	The camping policy outlined in Appendix E is vague….Closing off camping areas may not be a good idea because it will push people to areas that have never been camped in before.	No areas are closed to camping by action of the DRMP/EIS. In certain areas, camping is limited to designated sites. See response to comments 123-8 and 120-86 for a discussion of dispersed camping.
Blueribbon Coalition, Inc.	211	34	One of our favorite trails goes to Gemini Bridges. I would hate to see any changes made to that trail. It is such a beautiful area it would be a shame to limit access to that area as it is right now.	See response to comment 206-14.
Blueribbon Coalition, Inc.	211	35	Ten Mile Wash has been an ATV trail for many years and should remain open.	See response to comment 211-20.
Blueribbon Coalition, Inc.	211	36	I strongly oppose the fee system for White Wash Sand Dunes area.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	37	Building fences around the cottonwood trees and seasonal streams is not workable, not accepted, and not necessary.	See response to comments 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	38	I would really be opposed to a fee to be able to ride in this [White Wash Sand Dunes] area. One of my concerns here is that many times the fees collected are not used to benefit the users.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	39	I am definitely against the closing of any OHV trails that are now open.	See response to comment 208-2.
Blueribbon Coalition, Inc.	211	40	The White Wash “area” is much too small and should be expanded. Additionally the idea of closing the White Wash Sand Dunes is truly alarming! Riding the dunes as part of our club’s night ride is a tradition and one that is very important to a lot of people.	See response to comments 120-83 and 123-35. White Wash is available for open cross country travel in Alt. C.
Blueribbon Coalition, Inc.	211	41	I ask you not to close Ten Mile Wash. It has been a popular OHV route for several decades now.	See response to comment 211-20.
Blueribbon Coalition, Inc.	211	42	The plan seems to recommend closure of washes that have had vehicle use for many years.	Certain washes would be designated for travel under Alt. C. All washes, however, are not available for travel. See response to comment 122-14 for more information.
Blueribbon Coalition, Inc.	211	43	The proposed fee area for White Wash should be rejected outright. Paying for the privilege to use public	See response to comment 123-10.

			lands that exist because of public funding is absurd.	
Blueribbon Coalition, Inc.	211	44	Finally, the idea of vehicle camping only in designated campsites makes no sense for BLM managed lands. While it may be appropriate for national parks and monuments, on BLM land it is an unacceptable reduction in the freedom to use the land that is supposedly there to be protected for the public, not from the public.	The great majority of the Moab planning area is available for dispersed camping under all alternatives. Travel associated with dispersed camping must be on designated routes; many spur routes have been left available precisely for this purpose. See also response to comments 123-8 and 120-86.
Blueribbon Coalition, Inc.	211	45	I support leaving White Wash Sand Dunes and surrounding areas open to “open” (cross country) recreation. This is one of few areas left that sustains this type of use. Slickrock is another sustainable terrain of open/cross country travel.	White Wash Sand Dunes is avialable for open travel under Alt. C. See response to comment 122042 for a discussion of slickrock exploration.
Blueribbon Coalition, Inc.	211	46	I do not support the proposed fee system referenced in Alternatives C and D. It does not support the law congress passed regarding fees on public lands.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	47	Fencing off trees and “water sources” is impractical and unnecessary. Use signs/directional arrows in sensitive areas, (that require no activity) to direct travel where it is sustainable terrain.	See response to comments 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	48	I am concerned about designated camping areas – to be decided in the future. This DEIS designation will directly affect that process. It is already required to have a “toilet” when camping. This is a very used area – around the Dunes and areas slated for closure will greatly affect where camping will be permitted.	The BLM must address sanitation issues where they arise. In the White Wash area, the sanitation issues were brought to the agency's attention by the Grand County Sanitarian. However, sanitation issue is a matter of implementation and does not require a land use planning decision. See also response to comments 120-86 and 123-8.
Blueribbon Coalition, Inc.	211	49	I oppose the fee area in the White Wash Sand Dunes in Alternatives C and D. That area in Alternatives C and D needs to be expanded also. It’s much too small. The whole White Wash Sand Dunes management plan isn’t a good plan in my opinion. If you put fences around the trees they will be down the first big rain. It will be a waste of money and you will have to put them back up over and over again. It’s totally unpractical.	See response to comments 123-10 (fees), 123-35 (larger open area) and 208-3 and 479-6 (cottonwoods).
Blueribbon	211	50	The trails need to be for ATV’s and motorcycles both.	The BLM recognizes motorized singletrack as a

Coalition, Inc.			It's too hard to make separate areas for each user group. We sometimes have friends that will come ride with our ATV's and they have a motorcycle. Are they not to ride with me? I hope not. We need more trails not less.	recreation resource. Some routes are to be designated solely for two-wheeled use. However, the issue of shared routes is discussed in response to comment 120-90.
Blueribbon Coalition, Inc.	211	51	I go camping to get away from it all. I oppose the camping policy that is outlined in Appendix E. They should be left open and the public must be involved. You are pushing us to camp on sensitive areas that you are trying to protect if you close the camping off.	See response to comments 211-33, 123-8 and 120-86.
Blueribbon Coalition, Inc.	211	52	I am concerned over several issues surrounding White Wash Sand Dunes. One is the closure and restriction of existing motorcycle single track. Single track should be left open, particularly Copper Ridge and Thompson Trail should be combined. Non riparian washes should be left open. The challenges found on some of these trails are exhilarating.	No specific concern is listed for White Wash Sand Dunes. The BLM designates mileage of motorcycle single track in both Alts C and D. See response to comments 122-36 and 122-29 for Thompson Trail and Copper Ridge. See response to comment 122-14 for a discussion of riding in washes.
Blueribbon Coalition, Inc.	211	53	Camping restrictions concern me as well. I am concerned with the closure of popular camping areas, such as the "Top of the Hill" if these areas are closed where, and how shall we camp. I am concerned that we will be left with nowhere to camp.	See response to comments 123-8 and 120-86. If "Top of the Hill" refers to the White Wash area, the open area around White Wash has been expanded in the preferred alternative to include this popular camping area (see response to comment 120-83).
Blueribbon Coalition, Inc.	211	54	I also oppose the camping policy as outlined in Appendix E. I support a policy where existing campsites are open unless determined closure was necessary via lawful public planning process.	See response to comments 120-86 and 123-8.
Blueribbon Coalition, Inc.	211	55	Please keep the following routes open: The last bit of Gemini Bridges road, the Thompson Trail and Copper Ridge loop as proposed by Ride with Respect. Ten Mile Wash – popular washes that have had vehicle use for many years should remain open.	See response to comments 206-14 (Gemini Bridges), 122-29 (Thompson Trail), 122-36 (Copper Ridge) and 211-20 for Ten Mile wash.
Blueribbon Coalition, Inc.	211	56	We love the Sand Dunes and Ten Mile Wash and all the surrounding areas. Please keep them open.	The sand dunes are open to cross country travel in the preferred alternative, and the route in Ten Mile Wash is designated for travel in that alternative as well.
Blueribbon Coalition, Inc.	211	57	I would like to keep the White Wash area open to everyone.	See response to comment 211-56.

Blueribbon Coalition, Inc.	211	58	I am also against special fees in this area. Special recreation permits and fees are not supported by me. Fees should be implemented by public process. The public lands should be open to the public.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	59	The fencing of trees in the sand dunes is a huge waste of resources. It would be better just to mark the routes in washes to avoid the denser tree areas.	See response to comments 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	60	Your motorized alternative in my opinion is not a motorized plan. You need to keep more of the trails open and use your money to open new ATV trails. Don't close trails and not give us any other place to go. Look at what Grand Junction BLM is doing. Build trails for us. A lot of your two track roads would make really good ATV loops and give us a place to go.	See response to comments 122-15, 122-30, and 208-2.
Blueribbon Coalition, Inc.	211	61	I oppose the fee system. Any fee system that must be instituted needs to involve the affected user group.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	62	Fences around trees and water areas is unnecessary.	See response to comments 208-3 and 479-6.
Blueribbon Coalition, Inc.	211	63	Please keep the following routes open: the last bit of Gemini Bridges road, the Thompson Trail and the Copper Ridge loop as proposed by Ride with Respect, and Ten Mile Wash.	See response to comment 211-55.
Blueribbon Coalition, Inc.	211	64	I feel the camping policy as outlined in Appendix E does not tell us how many dispersed campsites would be closed and why they necessarily should be. There isn't enough areas now for the camping for motorized camping.	See response to comment 123-8 and 120-86.
Blueribbon Coalition, Inc.	211	93	There is no need for change in the White Wash Sand Dunes. Please keep it open as possible for future multiple use.	See response to comments 123-10.
Blueribbon Coalition, Inc.	211	94	I support designating more ATV trails, especially between White Wash and Red Wash. I suggest looking at the proposal made by Ride with Respect.	See response to comments 122-15 and 122-30 as well as the entire response to comments from commentor #122 (Ride with Respect).
Blueribbon Coalition, Inc.	211	95	How do you justify fencing the cottonwood trees and keep ranch cows from the shade. Sometimes we like to have lunch in the shade.	See response to comments 208-3 and 479-6. According to the BLM's range conservationist, cattle do not go onto the dunes as there is very little feed.

Blueribbon Coalition, Inc.	211	96	Currently the White Wash, Ten Mile, Dead Cow loop provide a great experience for motorcycle riding. These routes have been long time favorites.	All three routes (with the exception of the low water variant of the Dead Cow route along the Green River) are in the preferred alternative.
Blueribbon Coalition, Inc.	211	97	The multiple small campsites and pullout areas along roads provide dispersed camping and keeping as many open as possible is important to me.	An express purpose and need to retaining routes in the Travel Plan was "Recreational opportunities and experiences", which included dispersed camping. Spur routes were retained that accessed dispersed sites. See response to comments 123-8 and 120-86.
Blueribbon Coalition, Inc.	211	98	Appendix E: because there is nothing that tells how many or what campsites will be closed and it says nothing about public involvement. This needs to be changed.	See response to comments 123-8 and 120-86.
Blueribbon Coalition, Inc.	211	99	We strongly oppose the fee system. There is no way that the fees would be enough to even administer the program without being prohibitively high, and this country is PUBLIC LAND.	See response to comment 123-10.
Blueribbon Coalition, Inc.	211	100	We have camped with our 5th wheel in the same area for twenty years. When we go back the next year we can’t see any damage from where we were the year before.	See response to comments 120-83, 123-8 and 120-86.
Blueribbon Coalition, Inc.	211	101	The idea of making the White Wash Sand Dunes into a hiking and equestrian area is ridiculous! How many people or horses would have the strength or stamina to hike or travel through loose sand that is 6-12 inches deep? Making this an exclusive use area of this nature would effectively close the area.	There is no mention of White Wash as an equestrian area in any of the alternatives accompanying the DRMP/EIS. The White Wash area is proposed as a hiking area in Alt. B only.
Blueribbon Coalition, Inc.	211	102	…be sure that 80% of your fees collected in the charging areas should be used for upgrading travel trails, roads, camping areas, and toilet facilities.	See response to comment 123-8. The fees collected in the Moab Field Office are used for operations of this type, in accordance with FLREA.
Blueribbon Coalition, Inc.	211	103	If there is an existing two track to a site that has been historically used (for camping) it should not be closed.	Many such spurs to dispersed sites are available in the preferred Travel Plan alternative. Access to campsites was considered an express purpose and need for designating a route.
Utah Rivers Council	213	1	…a pending or potential water resource development project on an eligible river would in fact make it that much more important to include the river in the National	The BLM did not remove any rivers from a suitability determination based on any pending or potential water resource projects, potentail projects, or any other

			Wild and Scenic River System because without such protection the values of the river may be lost forever or be negatively impacted by the project. In other words, eligible rivers upon which there is a pending or potential water resource development or other project definitely and clearly make said river suitable to become a Wild and Scenic River. Therefore, a pending or potential water resource development or other project leads towards a positive suitability finding. Actual case examples back this up. For example, in 1993 in Arizona the Santa Maria River was evaluated for suitability by the BLM Phoenix District. The rational for finding the segment suitable states, "The downstream terminus of this segment coincides with an existing Corps of Engineers withdrawal for the floodwaters of the Alamo Dam. If the spillway height of Alamo Dam were ever significantly raised, the newly created floodwaters would inundate the stream's important riparian values (one of the outstanding remarkable values of this river)." This same discussion on a potential water resource development project leading to a positive suitability finding can be applied to other suitability factors with potential development projects, potential transportation projects, and facilities or other developments such as a nuclear power plant that will take water out of the river since they would irreparably harm the values of the eligible river. The Council urges the Moab F.O. to consider eligible rivers upon which there is a pending or potential water resource development project, potential development project, potential transportation project or other developments as suitable to become a Wild and Scenic River under all alternatives. At the very least, potential projects can not be used as a reason to find a river segment not suitable.	developments.
Utah Rivers Council	213	2	The preferred alternative in the Draft on page 2-41 changes the classification of one segment of the Green	The BLM has reevaluated the determination of the classification of the Green River from Coal Creek to

			River, from Coal Creek to Nefertiti from its original classification of ‘Wild’ in the eligibility study to ‘Scenic’ under the preferred alternative. There is no basis for such a change due to a manageability issue. The Council urges the Moab F.O. to find the Coal Creek to Nefertiti segment of the Green River as a ‘Wild’ river in the preferred alternative, as it was in the eligibility study and in Alternative B. There is nothing in the Wild and Scenic Rivers Act nor the BLM guidelines that state it is impossible to have a ‘Wild’ segment located adjacent to a ‘Recreational’ segment. These different classifications are based on the current development and accessibility to the particular river segment. While one segment may have a paved road paralleling it, the next segment may have no roads and no development. The different segments qualify for these classifications because of the development and accessibility in the different river segments. These segments have been managed with these differences in the past and designating adjacent segments as ‘Wild’ and ‘Recreational’ does not present any management issues. Several rivers in the National Wild and Scenic System do consist of a ‘Wild’ segment adjacent to a ‘Recreational’ segment. For example, on the North Fork of the Kern River (CA) there is a 13.2 mile ‘wild’ segment adjacent to a 17.8 mile ‘recreational’ segment. Also, the South Fork of Kern River (CA) has a 27 mile ‘wild’ segment adjacent to a 3 mile ‘recreational’ segment, which is then bordered by a 14.3 mile ‘wild’ segment, and the Wilson River (North Carolina) has a 4.6 mile ‘wild’ segment adjacent to a 15.8 mile ‘recreational’ segment. Therefore, the Council urges the Moab F.O. to find the Coal Creek to Nefertiti segment of the Green River as a ‘Wild’ river in the preferred alternative, as it was in the eligibility study and in Alternative B.	Nefertiti. The classification of this segment in the proposed alternative for this river segment has been changed to "wild".

Utah Rivers Council	213	3	Classification of River Segments Should Not be Downgraded from Eligibility Study to Sustainability Study. The classification of several river segments in the preferred alternative was downgraded from the original classifications given to them in the eligibility study. In Table 2.1 pages 2-39 to 2-42 of the Draft the following segments were downgraded in the preferred alternative from the classifications given in the eligibility study (J-67 to J-68): Colorado River – Segment 5: 'Scenic' in eligibility study to 'Recreational' in preferred alternative; Segment 6: 'Wild' in eligibility study to 'Scenic' in preferred alternative; Dolores River – Segment 1: 'Scenic' in eligibility study to 'Recreational' in preferred alternative; Segment 2: 'Wild' in eligibility study to 'Scenic' in preferred alternative; Segment 3: 'Scenic' in eligibility study to 'Recreational' in preferred alternative; Green River – Coal Creek to Nefertiti: 'Wild' in eligibility study to 'Scenic' in preferred alternative. The Council urges the Moab F.O. to give all of these segments the classification that they were given in the eligibility study, which is the same as that given in Alternative B on pages 2-39 to 2-41. Classification of rivers as wild, scenic, or recreational is an assessment of the degree of development in the river corridor. The Draft acknowledges this reality in Appendix J where it states "Tentative classifications are based on the type and degree of human evaluation." But then the Draft goes on to muddle the clear language of the Wild and Scenic Rivers Act by finding segment 1 of the Green River "wild" in alternative B and "scenic" in Alternative C. Similarly, segments 5 and 6 of the Colorado River are found to be "scenic" and "wild" respectively in Alternative B and "recreational" and "scenic" in alternative C. All of these segments are downgraded in the preferred alternative, Alternative C.	According to the Wild and Scenic Rivers - Policy and Program Direction for Identification, Evaluation, and Management (BLM Manual 8351) at least one alternative analyzed in detail shall provide for designation of those eligible river segements in accordance with the tentative classifications which have been made. Another alternative shall provide for no designation. The no-action alternative, i.e., a suitability determination is not made, should provide for on-going management, including continuation of protective management of eligible segments. Additional alternatives may be formulated for any combination of designations and/or classifications. Under Alt B of the DRMP/EIS, all eligible river segments were determined suitable in accordance with the tentative classifications. Under Alt C, the classification along the Colorado River for segment 6 was downgraded to a classification of scenic from its tentative classification in Alt B as wild. This classification in Alt C was in line with the theme of the alternative and would provide more flexibility in considering future uses in comparison to Alt B while still providing a wild and scenic river designation proposal. Segment 5 along the Colorado River was classified as recreational in Alt C of the DRMP/EIS. This classification has been changed to scenic in the PRMP/FEIS to be consistent with the classification proposed by the BLM Monticello Field Office. See response to comment 124-88.

			Classification is a relatively straightforward review of the degree of development in the river corridor, and not open to the degree of interpretation exercised here by the BLM Moab F.O. There is no basis in statute for the alternative classification schemes proposed under different Alternatives in the Draft. The classifications in Alternative C – the preferred alternative – are particularly ill founded and not at all based in the reality of development on the ground. Much of the Green River area is undeveloped and primitive as references time and again throughout the Draft itself. Classification is not to be used to address political concerns or other factors – it is simply a way of representing the extent of development in the river corridor. Downgrading the classification of river segments simply opens up these sections that are being downgraded to further developments or threats that are not in existence today. The entire point of the Wild and Scenic Rivers Act is to preserve certain select rivers as they are today. The tentative classification given to these segments is based on the actual development and accessibility to the river at the current time. Thus, this is the classification that these segments should be given in the suitability determination. Downgrading the classification of these segments is not consistent with the current development of these rivers and simply opens them up to future threats that may negatively harm the outstanding values of these rivers. We respectfully request that the Moab F.O. use the classifications documented in Attachment 3 of Appendix J, pages J-67 to J-68, for the various segments listed above of the Green, Colorado, and Dolores Rivers.	
Utah Rivers Council	213	4	Existence of Road Affects Classification of River Segment Rather than Suitability	The Moab Field Office (MFO) has coordinated with the Price Field Office (PFO) to ensure that the suitability

			The Council would like to stress that the presence of a paved or dirt road affects the classification of a segment rather than the suitability of a segment. The preferred alternative finds two segments of the Green River as not suitable: from Swasey's to I-70 and from I-70 down to River Mile 91. There are paved or dirt roads along sections of both of these segments. However, the mere presence of these roads does not make these segments not suitable. The Council urges the Moab F.O. to find these two segments suitable with a 'Recreational' classification for the segment from Swasey's to I-70 and 'Scenic' for the segment from I-70 down to River Mile 91. The existence of a paved or dirt road along the river segment or in a river corridor is something that must be considered when studying the potential for a river to be added to the National Wild and Scenic River System. However, it is important to note that the mere existence of a paved or dirt road does not disqualify a river segment from becoming a Wild and Scenic River. In other words a river segment that has a road adjacent to or in the corridor is not automatically determined to be not suitable. Instead the presence of a road or dirt road would affect the classification of the river segment. Table 2 in Appendix J, page J-10, the classification criteria for Wild, Scenic, and Recreational River Areas, makes it very clear that a road simply affects the classification and has nothing to do with the suitability of a segment. In the row 'accessibility' the table states under 'Wild', "No roads, railroads or other provisions for vehicular travel within the river area." Then in the next column, 'Scenic', it states, "Roads may occasionally reach or bridge the river. The existence of short stretches of conspicuous or longer stretches of inconspicuous roads or railroads is acceptable." In the final column, 'Recreational', it states, "The existence of parallel roads or railroads on one or both banks as well	determination for this segment of the Green River in the preferred alternative is consistent on both sides of the river. It was determined that the PFO would change their suitability findings to match that of the MFO. The Green River between Swasey's Rapid and river mile 91 contain a large amount of private land. This large amount of private ownereship along these river segments would make manageability difficult. The roads along the Green River were not a factor in this suitability decision. The presence of roads affects the classification but not the suitability.

			as bridge crossings and other river access points is acceptable." This table lays out clear standards as to how an eligible river should be classified based on the accessibility. The Moab F.O. has no justification based on the Wild and Scenic Rivers Act and its own documents to determine a river segment not suitable based on the presence of a paved or dirt road. Therefore, the Council urges the Moab F.O. to find the segment from Swasey's to I-70 suitable with a 'Recreational' classification and the segment from I-70 down to River Mile 91 suitable with a 'Scenic' classification.	
Utah Rivers Council	213	5	Coal Creek to Nefertiti should be classified as 'Wild'. This segment of the Green River is not paralleled by any roads (see map 2-11-C Designated Routes Alternative C) nor is there any development in the river corridor. Additionally, this area is proposed to be closed to OHVs in the preferred alternative (Map 2-10-C Off Highway Vehicle Categories – Alternative C). Therefore, this segment should keep its wild classification in order to maintain the river corridor in its current state and because a wild classification is consistent with other management objectives.	The classification of the Green River from Coal Creek to Nefertiti has been changed to wild in Alt C. The classification of wild is consistent with the management objectives for this alternative.
Utah Rivers Council	213	6	River mile 91 to Hey Joe Canyon segment should be classified as 'Wild'. This segment is also not paralleled by any roads nor is there any development corridor. There is a dirt road that heads up Hey Joe Canyon. his dirt road does not go into this segment, but heads south from Hey Joe Canyon. However, there are a few roads that lead to the boundary of the river area, but do not actually lead all the way to the river (see map 2-11-C Designated Routes Alternative C). As Table 2: Classification Criteria for Wild, Scenic, and Recreational River Areas on page J-10 states regarding a Wild river, "A few existing roads leading to the boundary of the river area is acceptable." Therefore, this segment should keep its 'Wild' classification in order to protect	The BLM has determined that the Green River is suitable for designation in Alt C from River Mile 97 (the confluence of the San Rafael River) downstream to Canyonlands National Park. The classification of the Green River from River Mile 97 to Canyonlands National Park is scenic throughout the entire segment in Alt C. The classification of the entire segment as Scenic is compatible with the other management objectives along the river in Alt C. These include travel limited to designated routes, and no surface occupancy for oil and gas leasing and other surface disturbing activities. The Green River is within the Labyrinth Rims/Gemini Bridges SRMA and the Labyrinth

			the river corridor as it currently exists today.	River Canoe Focus Area. The BLM asserts that the Green River from River Mile 97 to the Canyonlands National Park boundary is more manageable with a consistent classification throughout. The BLM does not see the need to further segment this portion of the Green River so that small reaches can be classified as "wild".
Utah Rivers Council	213	7	Majority of land in Green River corridor from I-70 bridge to River Mile 91 is public land. As stated earlier, this segment of the Green River is part of the incredible Green River corridor and should be found suitable as a Wild and Scenic River with a Scenic classification. Discussions with the various BLM Moab F.O. point out that one of the reasons this section was found not suitable in the preferred alternative was the amount of private land in the corridor complicating manageability of the segment. However, a careful analysis of the amount of private land versus public land shows that by far the majority of the land in the river corridor between river mile 119 and 99 (Ruby Ranch property) is public land. Based on a review of the map provided in the Moab Draft, 18 of the 28 miles or 64% is public land and only 10 miles or 36% of the land is private. This clearly shows that the majority of the land in the corridor is public, the manageability of this section of the corridor should not be an issue, especially considering that some of the private landowners support the river being designated as a Wild and Scenic River. Furthermore, the Wild and Scenic Rivers Act provides for collaboration between public agencies and state and local governments in order to manage the river. Thus, the issue of manageability of the river is simply not an over-riding concern because the Moab F.O. can collaborate with the private land owners (through the form of the local government or even via a	See response to comment 213-4. The BLM stands by its assessment that the mix of private and public lands creates a manageabilty problem.

			resource advisory committee) in the area to best manage the Wild and Scenic Green River. Section 11 (b)(1) of the Wild and Scenic Rivers Act specifically allows any Federal agency to cooperate with state and local governments to plan, protect, and manage river resources. Therefore, the Moab F.O. should find the segment of the Green River from I-70 bridge down to River Mile 91 suitable to become a Wild and Scenic River with a scenic classification.	
Utah Rivers Council	213	8	It simply does not make any sense to protect the upper and lower sections of the Green River in the Moab F.O. and not include the middle section. Failing to include this section opens the Green River up to possible threats that would then impact and harm all other stretches of the river. Furthermore, anything that happened on this unprotected stretch of the Green River would impact any suitable or designated sections of the Green or Colorado Rivers downstream and possibly upstream. Giving these river segments a positive suitability factor for their contribution to the river system and river basin integrity is consistent with the goals of the Wild and Scenic Rivers Act – to preserve select rivers in their free-flowing condition. River systems are interconnected wholes. Main stems of rivers can provide habitat for core populations of aquatic organisms. Migration of organisms up and down stream along this river is often critical for the persistence of these populations, many of which on the Green River are now endangered species. The core populations serve as stable sources of dispersers that can recolonize habitats (such as after flood or drying events) and help to maintain genetic diversity. River are the circulatory system of landscapes. They filter and distribute nutrients, as well as pollutants, as they transport water throughout the river network.	See response to comment 213-7.

			Degradation in one location can adversely affect habitat or populations of organisms downstream. For example, in-stream gravel mining can increase turbidity downstream of mining operations. Also, the loss of riparian vegetation in headwater streams due to overgrazing or development can lead to an increase in nutrients, pollutants, and sediment entering streams and rivers. All of these effects reduce water quality and are detrimental to the health of many aquatic organisms. Finally, it is vital to find every river segment suitable along the river system due to the importance of an interconnected river system and adverse effects that could arise due to fragmentation of a river. For example, finding one segment of the Green suitable and another not suitable could allow a dam or other project to be built on the non-suitable segment in the future. Dams are known to have adverse effects in downstream locations via changes in the timing, magnitude, duration, and frequency of flood events. Thus, a future dam or diversion on the Green River could present a significant threat to the integrity of a downstream segment designated as a Wild and Scenic River. This would be counter to the purposes of the Wild and Scenic River Act by destroying the natural character of the designated river. This demonstrates the importance of designating all eligible components of the Green River as suitable to become a Wild and Scenic River in order to maintain the connectivity if the river system and to protect and maintain the integrity of the river system with its myriad values. Without this Wild and Scenic River designation it is impossible to guarantee the future of the Green River and to guarantee the protection of these outstanding values, such as scenic, recreation, and endangered fish species.	
Utah Rivers	213	9	The list of eligible segments of the Green River and the	There are 6 river segments along the Green River and

Council			segments that are analyzed for suitability are inconsistent. In Appendix J, seven suitability factors were considered for each of the different rivers, including the Green River. Attachment 2 in Appendix J, pages J-61 to J-64, shows that 6 segments of the Green River are eligible to become a Wild and Scenic River. However, attachment 4, pages J-81 and J-82, lists the suitability considerations for the, “Green River – Segments 1 through 5”. Thus, the suitability analysis fails to even include all 6 eligible segments in the analysis. It is impossible to determine which of the 6 eligible river segments were not included in the analysis because they are not listed nor mentioned.	this error has been corrected in the PRMP/FEIS. The heading on pg. J-81 of the DRMP/EIS has been changed to "Green River segments 1 through 6".
Utah Rivers Council	213	10	The suitability analysis of the Green River includes segments 1 through 5 together. The response to each of the seven suitability factors does not make it clear which of the segments the response applies to. This completely muddles the entire suitability analysis as it is impossible to determine why some segments were found suitable and others were found not suitable.	There are 6 river segments along the Green River and this error has been corrected in the PRMP/FEIS. Attachment 4, Suitability Considerations by Eligible River Segment, has been augmented for the Green River and this augmentation makes the suitability determinations more clear.
Utah Rivers Council	213	11	There is a paucity of information included in the suitability analysis in Attachment 4 on pages J-81 to J-82. A total of 7 factors are listed. T he only response to a factor that has some decent information in the response for land ownership and current use. However, even this response does not provide enough information to make a decision regarding the suitability of these five segments. For example, one of the responses to the suitability factors is not included in Attachment 4 on page J-81. The response to the factor – Uses, including reasonably foreseeable uses, that would be enhanced or curtailed if designated; and values that would be diminished if not designated, states, “Uses and values affected will be addressed in the impact analysis for the Price RMP/EIS.” This provides absolutely no information to a reader and does not	See response to comment 213-10.

			adequately address the suitability factor, which therefore provides no indication if this leads to a finding of suitable or not suitable for each of the different eligible segments of the Green River. At a minimum the response to this factor should at least include a summary of the referenced impact analysis so that the Moab F.O. can make an informed decision and so that a reader may understand the justification for the decision reached. For the factor – the estimated costs of administering the river, including costs for acquiring lands, the response has no information. It simply is a blank space. This is yet another example of the paucity of information and demonstrates the incomplete and inconclusive suitability analysis. Additionally, the response to the factor – Characteristics which would or would not make it suitable, is not understandable. The statement lists, “These values are listed in detail in Table 3.” Table 3 in Appendix J is on page J-13. This table, Suitability Study Interdisciplinary Meetings, has nothing to do with the values of the Green River. This is yet another example of the incomplete nature of the suitability analysis. In other words the suitability analysis in the Draft fails to provide accurate information for 2 of the 7 suitability factors, and does not include any information on 1 of the 7 factors. In addition, the seven factors that were considered are incomplete. For example, it does not appear that the Moab F.O. considered the support of the public for designation nor is there any sign that the contribution of the river segment to the overall integrity of the river system was considered. This is an excellent example of the incomplete and confusing nature of the suitability analysis. The suitability recommendations reached from an incomplete and confusing suitability analysis are not justified.	
Utah Rivers	213	12	Nowhere in the draft document does the Moab F.O.	According to the Wild and Scenic Rivers - Policy and

Council			share how they evaluated the factors in order to come to a decision about suitability. Nowhere in the Draft does it state how each of the seven suitability factors were evaluated. It is impossible to determine why the Moab F.O. determined that certain segments of the Green River were suitable and other segments of the Green River were not suitable. For example, how does the Moab F.O. interpret the response on page J-81 that states, "Uses and values affected will be addressed in the impact analysis for the Price RMP/EIS." What does that actually mean in terms the suitability of the different segments of the Green River? Does that lead to or against a suitable finding for segments of the Green River? Another example of the vagueness in interpreting the suitability factors relates to the response on page J-81, "State and local governments are unsupportive of any determination of suitable. There is likely support from the environmental community for determinations of suitability." What does that mean for the suitability of these different segments of the Green River? Does that lead towards or away from a suitable finding? Despite the confusion and lack of information in the suitability analysis the Draft includes recommendations for which segments are suitable under the different alternatives in Table 2.1, page 2-41 of the Draft. These recommendations for suitable and non suitable segments are given no justification based on the documentation in the Draft. Therefore, it appears that the Moab Field Office's suitability recommendations are completely arbitrary in nature. Because of this disconnect, the Draft RMP's suitability determinations are not supported by substantial evidence on the record and so are not defensible. Furthermore, the public has not been given a meaningful opportunity to provide substantive	Program Direction for Identification, Evaluation, and Management (BLM Manual 8351) at least one alternative analyzed in detail shall provide for designation of those eligible river segements in accordance with the tentative classifications which have been made. Another alternative shall provide for no designation. The no-action alternative, i.e., a suitability determination is not made, should provide for on-going management, including continuation of protective management of eligible segments. Additional alternatives may be formulated for any combination of designations and/or classifications. Under Alt B of the DRMP/EIS, all eligible river segments were determined suitable in accordnace with the tentative classifications. Under Alt Ct the classification are in line with the theme of the alternative and would provide more flexibility in considering future uses in comparison to Alt B while still providing a wild and scenic river designation proposal. Appendix J of the DRMP/EIS provides the BLM's Suitability Study. This study was completed in accordance with BLM Manual 8351. The study is explained on pg. J-11 and is attached in its entirety on pgs. J-69 through J-82.

			comments on the suitability analysis due to the paucity of information in the Draft and the vagueness in terms of interpreting the different factors. The public would simply be taking a shot in the dark due to the confusing and incomplete nature of the suitability analysis in the Draft.	
Utah Rivers Council	213	13	Table 2.1, page 2-41, creates new segments for the Green River. This further confuses the suitability analysis. These new segments are not consistent with either the six eligible segments of the Green River (J-61 to J-64) nor to the five segments of the Green River that were included in the mixed up suitability analysis (J-81 to J-82). These new segments of the Green River are not consistent with the segmentation of the Green River in the Price Draft RMP. Therefore, any justification for creating new segments for the Green River does not exist nor does the suitability analysis cover these new segments. This is yet another example of the incomplete and inconclusive nature of the suitability analysis preformed by the Moab F.O. In conclusion, we respectfully request that the Moab F.O. conduct in depth suitability analysis of all segments of the Green River found eligible for protection using the approach recommended by the Interagency Wild and Scenic Rivers Coordinating Council (page 17 of “The Wild and Scenic River Study Process”) and involving the public throughout the process.	The reference to 5 river segments along the Green River was in error and has been corrected in the PRMP/FEIS to 6 segments. The Price and Moab PRMP/FEIS's are now consistent in proposed management for Wild and Scenic Rivers. The suitability analysis for all segments of the Green River has been augmented and information added to the PRMP/FEIS.
Utah Rivers Council	213	14	The resegmentation of the Green River in the Draft RMP is not justified, explained, and is inconsistent with the segmentation of the Green River in the Price Draft RMP. The Moab Draft resegments the Green River in the preferred alternative (see Table 2.1 page 2-41_. The rationale for this resegmentation is not explained nor justified anywhere in the Draft. Appendix J of the Draft documents the Wild and Scenic River Study	See response to comments 213-12 and 213-13.

			process, including eligibility, tentative classifications, and the suitability study. Attachments 2 and 3 in Appendix J both have 6 segments of the Green River. These segments are consistent with the segments of the Green River in the Price Draft RMP. We urge the Moab Field Office to change the resegmentation of the Green River in the preferred Alternative in Table 2.1 back to the original segments identified in the eligibility study (attachments 2 and 3 in Appendix J) and in alternatives B and D in Table 2.1.	
Utah Rivers Council	213	15	Inconsistency with Price BLM Draft RMP The West side of the Green River is managed by the Price F.O. an the East side is managed by the Moab F.O. It is important that the decisions reached by the two offices regarding the Green River are consistent. The Price F.O. released its draft RMP in July 2004, in which recommendations were made regarding the Green River as suitable to become a Wild and Scenic River. Unfortunately, the Moab Draft and the Price Draft differ in their preferred alternative. It is vital that both sides of the Green river are managed in the same manner so as to ensure cohesion and consistency. The table below summarizes the discrepancies between the two field offices for the Green River. (See Comparison of Price Draft RMP and Moab Draft RMP table included in the Utah Rivers Council comments, page 15.) It is vital that the two BLM field offices are consistent in terms of their recommendations for the Green River as a Wild and Scenic River. We have taken this into account in our recommendations for the Green River. Please see our recommendations for a Wild and Scenic Green River above to see a consistent approach between the two field offices for a suitable Wild and Scenic Green River.	See response to comments 213-12 and 213-13.
Utah Rivers Council	213	16	We are extremely concerned with the approach to suitability reviews provided in the Draft for these	See response to comment 124-88, 213-12 and 213-17.

			segments (from page 22: Mill Creek – National Forest Boundary to private property below diversion: Recreational, Mill Creek – T26S, R23E, Section 19 to Power Dam: Scenic, Onion Creek – Source to Onion Creek Road: Wild, Onion Creek – Beginning of Onion Creek Road to Colorado River: Recreational, Professor Creek – National Forest and state land boundary to diversion near private land: Wild, Beaver Creek – Forest Service boundary to one mile from Dolores River: Wild, Beaver Creek – One mile to Dolores River: Scenic, Negro Bill Canyon – from state land below rim to ¼ mile from Colorado River: Wild, Negro Bill Canyon – last ¼ mile to Colorado River: Recreational) due to the paucity of information provided in the suitability analysis, lack of justification for the conclusions reached regarding the suitability of the different segments, and vagueness in interpretation of each suitability factor. Based on these the Moab Draft does not provide adequate justification for finding these segments not suitable and we are at a loss as to how to refute the conclusion that these segments are not suitable. Therefore, the Moab F.O. should find all of these suitable under the preferred alternative with the classifications listed above. First, nowhere in the draft documents does the Moab F.O. share how they evaluated each of the seven listed suitability factors in order to come to a decision about suitability of the segment. It is impossible to determine why the Moab F.O. determined that these rivers were not suitable. For example, how does the Moab F.O. interpret the response on page J-75 regarding Negro Bill Canyon for the factor, 'Land ownership status and current use of the area', which states – 100% BLM? Does that lead to or against a suitable finding for segments of the Green River? This response appears to lead toward a positive suitability finding.	

			Another example of the vagueness in interpreting the suitability factors relates to the response on page J-76, “Interest/Support from some local residents, and environmental organizations.” What does that mean for the suitability of these segments of Mill Creek? Does that lead towards or away from a suitable finding? This response appears to lead towards a positive suitability finding. Despite the lack of information and vagueness in interpretation of the suitability factors in the suitability analysis the Draft recommends that all of these river segments are not suitable in the preferred alternative in Table 2.1, page 2-41 of the Draft. These recommendations for non suitable segments are given no justification based on the documentation in the Draft. In fact, a review of the limited information presented on these segments in Appendix J Attachment 4 argues FOR suitability, rather than against it. For all of the segments we listed above, the only information listed in Appendix J that could possibly be interpreted as negatives is the occurrence of grazing on some stretches and the fact that some of the segments are open to mineral leasing and/or oil and gas leasing. Grazing or some oil and gas leasing are not a bar to suitability, nor would Wild and Scenic status necessarily harm those activities (for example, grazing can continue on Wild and Scenic stretches as long as the ORVs are protected). Most of the presented information actually argues in favor of suitability for the stretches, including the descriptions of the values, the public (particularly the local) support described, and even the lack of acquisition costs associated with the stretches. So, even with the extremely limited data presented in the Draft, the evidence argues for suitability. Therefore, it appears that the Moab Field Office’s suitability recommendations are completely arbitrary in nature. Because of this disconnect, the Draft	

			RMP's suitability determinations are not supported by substantial evidence on the record and so are not defensible. The Council urges the Moab F.O. to find all of these segments suitable to become a Wild and Scenic under the preferred alternative with the classifications listed above.	
Utah Rivers Council	213	17	Finding these segments suitable is consistent with other management objectives These river segments all have other protective measures that are consistent with being found suitable to become a Wild and Scenic River. Therefore, all of these segments should be found suitable with the classifications listed above. First, the preferred alternative on page 2-16 recommends that nearly 26,000 acres in Beaver Creek, Fisher Towers and Mary Jane Canyon be managed as non WSA lands with wilderness characteristics. Beaver Creek, Professor Creek, and Onion Creek all fall within these areas. Therefore, managing Beaver Creek, Professor Creek, and Onion Creek as a Wild and Scenic River is consistent with managing the area as a non WSA land with wilderness characteristic. Secondly, the preferred alternative on page 2-36 to 2-37 recommends a Mill Creek Canyon ACEC. Such management is consistent with managing Mill Creek as a Wild and Scenic River. Therefore, Mill Creek should be found suitable as a Wild and Scenic River, Third, the preferred alternative on page 2-43 recommends that both Mill Creek Canyon and Negro Bill Canyon should be managed as wilderness study areas, which closes the area off to OHVs. Therefore, managing Mill Creek and Negro Bill Canyon as Wild and Scenic Rivers is consistent with this type of management. In summary, all of these segments are being recommended under the preferred alternative to be managed with these different types of protections.	The segments mentioned by the commentor are managed in the preferred alternative with other protective measures in place. It is because of these protective measures (WSA, ACEC or wilderness characteristics) that the BLM chose not to find these streams as suitable. Only rivers having a Recreation ORV which included boating and rafting were placed in Alt.C. Only a Wild and Scenic River proposed designation can protect a river from upstream federally-funded damming. Wild and Scenic River designation, in assuring downstream flows, would protect the Recreation ORV of floating and rafting by assuring instream flows. The streams mentioned by the commentor do have non-boating Recreation ORVs. These Recreation ORVs involve hiking in riparian areas. The Recreation ORVs in these smaller streams can be protected by the imposition of other management actions.

			Therefore, this type of management is consistent with finding all of these rivers suitable to become Wild and Scenic Rivers.	
International Mountain Bicycling Association	217	1	IMBA supports the Grand County Non-Motorized Trails Master Plan recommendations for alternate routes in these areas. IMBA also supports the recommendations of MTA that the Green Dot (Gemini), Blue Dot (Gold Bar Singletrack listed in "D"), and Wags Way (Poison Spider) trails be identified as critically in need of work to reduce damaging user-created routes, Projects to rehabilitate trails and provide high-quality experiences often attract many volunteers from the mountain biking community.	The Green Dot and Wags Way were not analyzed in the current RMP effort. At the conclusion of the planning effort, the Moab Field Office will entertain proposals for new trails. See response to comment 122-15 and 122-30.
International Mountain Bicycling Association	217	2	IMBA objects to the term "mechanized" when describing bicycles because this definition is unclear. Some pages in the draft RMP correctly categorize mountain biking as non-motorized, while other create this third category of recreation. By doing so, travel management is needlessly complicated and the agency unfairly and incorrectly implies the impacts of mountain biking are similar to motorized travel and more than other non-motorized uses	Mountain bikes are restricted to designated routes within the DRMP/EIS. The BLM uses the term "mechanized" to distinguish those routes that are open to mountain bike use, but not to motorized use. This term is used in the National Mountain Bike Strategy.
International Mountain Bicycling Association	217	3	IMBA requests that the Moab RMP adopt a management policy that would permit bicycling on some trails in non-WSA (ACEC) areas. While bicycling may not be appropriate on some trails in these areas, others can provide a welcome relief from front-country and motorized areas. A decision to ban this use should be based on scientific reasoning	The policy referred to by the commentor is not a land use planning issue. New bicycle trails outside WSAs can be considered in any area of the field office. Only hiking focus areas would be excluded from new bike trail construction.
Utah Farm Bureau Federation	219	1	In the Taylor Grazing act, Congress gave the agency at the local, state and national levels, the obligation and responsibility to protect and safeguard livestock grazing rights. Any decisions by the agency that would impact the economic contribution, jobs, culture, and historic use must be consistent with congressional mandates.	FLPMA provides for BLM's land use planning process and the allocation of resources. The BLM has followed the dictates of the Taylor Grazing Act. No specifics are provided of violations of this act.
San Juan Public Entry	267	1	The Cameo Cliff area should be designated as a focus area for ATV use.	Cameo Cliffs is to be managed to provide "sustainable opportunities for road-related motorized recreation on a

and Access Rights				marked route system" (DRMP/EIS, pg. 2-18). These opportunities include ATV use.
San Juan Public Entry and Access Rights	267	2	We do not agree with BLM's position on pursuing more wilderness. FLPMA provided a time frame for BLM to inventory wilderness. That time frame has long ago come and gone. BLM was forced to rescind their Wilderness Inventory and Study Procedures Handbook because it was inappropriate. In Oct 2003, BLM came out with an instruction memo 2003-275 Change 1 that says BLM may consider wilderness characteristics in preparing their RMPs. This sounds almost like abuse of Congress intent of FLPMA.	See response to comments 121-10, 120-8, 120-9, 121-61, 121-71 and 121-58.
San Juan Public Entry and Access Rights	267	3	We must admit we did not read your document verbatim, but we could find no reference to The American Disability Act of 1990, the Discrimination Act of 1991, or even the Age Discrimination Act of 1967. You are not providing for the elderly or the disabled in your plan. The only thing we are aware of that you do is provide disabled access to your outhouses. Some where in this plan you should be doing something special for the disabled and elderly. By shutting down certain areas to motorized use you are discriminating against the elderly and disabled. We realize it is impossible to provide access to every spot but if roads or trails exist, leave them so those who can't enjoy the values by hiking, can still see them by motorized access. We therefore recommend all existing roads be left available for the elderly and handicap to use by motorized methods.	The BLM worked with Grand and San Juan counties to provide a transportation plan that meets the access needs of recreationists. The plan designates over 3,000 miles of road for travel.
San Juan Public Entry and Access Rights	267	4	On page 4-253 you make the statement that it is not likely that BLM-related management decisions (apart from recreation decisions that could increase revenues to recreation based businesses) would result in significant changes to current population trends I don't know where you got your data for this statement.	Population data were obtained from the U.S Census Bureau. Population trends in Grand county have not been tied to BLM actions in past years; it is therefore assumed that BLM actions will have little to do with shaping population trends in the future.
San Juan Public Entry	267	5	Do you have scientific data to support the large deer and elk habitat areas? We do not think so. We had a	BLM has utilized data from the Utah Division of Wildlife Resources, the state agency with jurisdictional authority

and Access Rights			member of our organization accompany the wildlife biologist (Charles Kay), hired by San Juan County to look at your proposed habitat areas in San Juan County. We observed that he found no scientific data or need for these large habitat areas. Studies paid for by San Juan County, and done by Charles Kay supports this statement.	on wildlife.
Theodore Roosevelt Conservation Partnership	288	1	Need for Upfront Comprehensive Planning Prior to Leasing: The Moab DEIS generally ignores timely scientific studies and does not provide adequate assurances for mule deer, desert bighorn sheep, Rocky Mountain bighorn sheep, pronghorn, elk, sage grouse, and Colorado cutthroat trout. The Moab DEIS fails to adequately address oil and gas development and how it can be conducted in a way that does not unnecessarily impact fish and wildlife in their habitat. I am concerned that the DEIS would enable energy leasing in crucial wildlife habitats without the necessary upfront conservation planning. All areas of crucial fish and wildlife habitats available for oil and gas leasing and without NSO stipulations should have upfront planning prior to the leasing stage to ensure that energy development will be conducted responsibly. While timing stipulations are important, they do not address how an area will be developed in order to minimize impacts to wildlife. Once a lease is sold, a contractual obligation to develop the energy resources is created and the BLM forfeits most of its right to plan energy developments. The impacts of development on big game and fisheries populations should be weighed in advance so that fish and wildlife losses can be prevented or minimized. While timing stipulations are important, they do not address how an area will be developed in order to minimize impacts on wildlife. Upfront planning prior to	The DRMP/EIS provides a range of alternatives that allows the BLM to develop management prescriptions to protect wildlife resources as energy development occurs. The action of leasing itself does not provide the site specific details necessary for extensive analyses of oil and gas development. Upon actual development of leasing tracts, environment analyses will be conducted to determine what the specific conflicts, impacts and mitigation will be. Cumulative impacts will also be determined and mitigation measures developed. Public lands are managed under a multiple use mandate. All resources are considered, including wildlife. The BLM has a obligation to ensure that wildlife is protected. Stipulations that have been developed in the preferred alternative will be attached to leases so that the leasee is aware of potential restrictions that may be applied when development occurs. If new information is presented at the time of development, the analysis will also include this new informatio

			leasing is a necessary component of responsible energy development. Below are some elements to upfront planning that should be seriously considered by the Moab FO for incorporation in the FEIS alternatives.	
Theodore Roosevelt Conservation Partnership	288	2	Geographically Phased Development: The Moab FO should consider geographically-phased energy development prior to leasing stage to responsibly balance the needs of fish and wildlife with natural gas excavation. Large geographic areas to be offered for oil and gas leasing first should be subdivided into smaller parcels to be leased. Those parcels should be developed fully and completely restored (with respect to fish and wildlife habitat) one at a time before subsequent parcels are developed. That way, wildlife displaced from the developed parcel can migrate to equal value habitat on adjacent lands. When the wildlife habitat on the developed parcel is restored, displaced wildlife can return, and the next parcel can be made available for development. In this way, smaller parcels are developed and restored over a longer period of time, not in the current mode of field development that is too fast. Species of interest to hunters that could be especially helped by geographically phasing are mule deer, pronghorn, elk, bighorn sheep, and sage grouse. For geographically phasing to be effective in reducing adverse impacts on wildlife populations, the species-specific life stage habitat requirements must be known for the impact area so that all life-stage requirements are provided for; even in the face of parcel subdivision and development. Baseline conditions and future objectives should also be known before development proceeds. Corridors providing wildlife with access to seasonally-required habitat must remain intact and functional at a level acceptable to sustain populations. The area to be developed should be determined for each geographic area based on species present and an	The action proposed by the commentor is not within the scope of the DRMP/EIS. At the oil field development stage, there may be an opportunity to utilize the concept of geographically phased development. Prior to the development phase, there is no ‘purpose and need ‘ for the level of analysis suggested by the commentor.

			assessment of overall habitat conditions in a larger, surrounding area including what is needed to sustain the populations through the development period.	
Theodore Roosevelt Conservation Partnership	288	3	Upfront Commitment of Funds for Management, Monitoring and Restoration: The DEIS fails to provide a commitment to adequate funding of wildlife management, monitoring, and restoration for oil and gas development projects. In times of increasing pressure from energy development on our public lands – fish and wildlife management needs more funding, not less. Funds targeted for fish and wildlife are being redirected to the processing of permits for expanded energy development or planning for large scale energy projects. Providing long-term funding to monitor, evaluate and protect fish and wildlife populations influenced by energy development through post-development habitat and population restoration is essential. Funding appropriated for fish and wildlife management should be used to proactively manage habitats and populations, not just mitigate damage, process energy permits or plan for energy projects. Funding increases for energy development must be matched by increases for fish and wildlife management. Funding assurances should be given for the duration of the development and subsequent restoration. Included with increases in funding should be provisions for ongoing, intensive monitoring of fish and wildlife species and their habitats to facilitate alterations in development if unintended adverse impacts occur.	Funding for various projects is not an objective for the Resource Management Plan. The RMP is not a funding tool. The RMP assumes that the BLM will have the funding and personnel necessary to undertake the actions mandated by the decisions in the RMP.
Theodore Roosevelt Conservation Partnership	288	4	Mitigation Plan: Given the nature of leasing and the need for upfront comprehensive planning, it needs to be known during the RMP process how the Moab FO will establish plans for mitigation, including detailed monitoring and the use of adaptive management strategies to prevent, minimize or mitigate impacts of oil and/or gas exploration and development for future parcels offered for leasing. It needs to be known what	The RMP is landscape level planning tool to which site-specific proposals are tiered. There must first be a proposed project prior to developing site specific mitigation. Leasing itself is not a proposed action with a purpose and need, therefore, developing mitigation is not within the scope of this document. Site specific mitigation is developed at the time of the oil and gas development project, which is subject to site-specific NEPA analysis.

			the BLM will do to ensure that the areas that are developed get restored so that they can be hunted again during the lifetime of Utah hunters and anglers Prior to leasing, it needs to be known how long these potential energy developments will take to be implemented, recovered, and mitigated. The Moab FO also needs to know how the amount of money suggested for mitigation will relate to the revenues that will come from the developed area, and how it relates to the habitat base and to the biological needs of wildlife populations being affected. Under the current practice of leasing prior to planning, the Moab FO is sacrificing their ability to adequately plan energy development and accomplish the mitigation tactics of avoiding, minimizing, and reducing impacts on the public's fish and wildlife habitat.	
Theodore Roosevelt Conservation Partnership	288	5	Multiple Use Management: The BLM should detail in the Moab RMP how public lands proposed for leasing and development within the Moab resource area will be managed for a balance of uses, as required by FLPMA. FLPMA sets for a multiple use mandate [The Organic Act for the BLM] that federal agencies must not ignore. With regards to energy development in the Moab FO, this means that the BLM must consider effects on outdoor recreation and the conservation of fish and wildlife species and habitat, notably mule deer, elk, desert and Rocky Mountain bighorn sheep, pronghorn, Colorado Cutthroat Trout, and sage-grouse in determining appropriate natural gas extraction management. All alternatives should retain sufficient management discretion for BLM to permit development of the gas resource without improperly committing itself to wholesale conversion of the area from lands containing wildlife habitat, rangeland, watershed, and energy resources, into a single-use industrialized zone	The DRMP/EIS proposes many broad management prescriptions to protect wildlife and their habitats. The specific issues raised by the commentor will be taken into consideration at the lease development stage. Planning is a tiered process, with the RMP setting the broad general guidelines. Site specific NEPA analyses develop the mitigations that are to be imposed upon the specific project.

			effectively committed to natural gas extraction to the exclusion of most other uses. Given the lack of upfront planning within the DEIS, it is concerning to us that the draft RMP is on track to such single-use zones.	
Theodore Roosevelt Conservation Partnership	288	6	Commitment to UT Division of Wildlife Resource's Management Objectives: The BLM fails to show how it will work to maintain wildlife objectives set by the UT Division of Wildlife Resources (UT DWR). Any determination of areas available for leasing and the appropriate development of these leases should be done with careful consideration of wildlife management objectives set by the UT DWR. All important habitat areas should not be opened for leasing until the Moab FO develops a plan for development that uses science based measurable benchmarks to allow the development to take place in a way that will not considerably impact UT DWR's ability to meet management objectives for fish and wildlife and provide public opportunities for hunting and fishing. This planning should incorporate a specific conservation strategy in concert with UT DWR on how to maintain current big game and upland game-bird population objective in the areas that will become available for leasing.	The Moab BLM has worked with the Utah Division of Wildlife Resources (UDWR) throughout the development of this RMP. A specific plan of development is required once exploration determines the need for oil or gas field development. The plan of development is not developed at the leasing stage, as at this time, there is no 'purpose or need' for field development. All leases are offered with stipulations to protect known resource values. Upon exploration, an environmental analysis is conducted to determine the specific impacts of the project. Also taken into consideration at this time is any new information that has developed since the time of the RMP. This new information will also be analyzed, and mitigation measure will be developed. Once field development needs have been established, the Plan of Development further addresses impacts, mitigation and cumulative effects on a site-specific level.
Theodore Roosevelt Conservation Partnership	288	7	The BLM fails to correctly acknowledge crucial wildlife habitats that UT DWR has developed based on more than 20 years of data collection and wildlife observations by field biologists. These data are available to the public on the UT DWR website (http://dwrcdc.nr.utah.gov/ucdc/DownloadGIS/disclaim.htm) and should be considered under all RMP alternatives. Failure to consider these data and potential impacts to crucial deer and elk habitat under all alternatives will result in an incomplete NEPA analysis. Alternative B is the only alternative that correctly	The BLM has worked closely with Utah Division of Wildlife Resource (UDWR) biologists in developing and correctly mapping ALL big games habitats, especially deer & elk winter ranges. This cooperation resulted in the BLM using the exact habitat coverages recommended by UDWR. Many UDWR habitat areas have been expanded as a result of BLM wildlife biologist recommendations. RMP decisions were made that protected these habitats. Alternatives C & D propose seasonal restrictions on winter ranges that were rated by UDWR as "crucial', whereas the 'high value' winter habitats are only restricted in Alternative B. Most of these 'high value' winter habitats are protected by seasonal restrictions (winter) for wet

			acknowledges crucial mule deer and elk winter ranges. The proper description of crucial winter habitats should occur regardless of alternatives. The removal of habitats based on alternative is arbitrary – habitat either is crucial or isn't. Rocky Mountain bighorn sheep habitat differs among the alternatives. Crucial sheep habitat identification is based on years of observational data by UT DWR and should not be subject to an administrative decision that could be altered by mapping. There currently are no bighorn sheep inhabiting the easternmost portion of the Book cliffs, due to the presence of domestic sheep. However, adequate bighorn sheep habitat exists along the entire Book Cliffs face, and alternative B is the only alternative which correctly describes this information. UT DWR recommends that BLM utilize the best information available to describe the wildlife occurring within the resource area. Therefore, the wildlife habitat data should be presented consistently within the given Alternatives and only the differing impact scenarios will differ among alternatives.	soils, steep slopes, or are in areas that are virtually inaccessible in winter months. The BLM worked closely with UDWR on Rocky Mountain Bighorn Sheep habitat. The BLM took full advantage of the decades of information and knowledge gathered by UDWR. Much of this habitat is within a Wilderness Study Area, and is completely protected from all surface disturbing activities. Rocky Mountain Bighorn are moving eastward. The habitat the BLM has defined in Alternative C represents 100% of the UDWRs designated 'crucial habitat' as well as a large portion of UDWR's 'substantial habitat'. Before we can even consider the eastern portion of the Bookcliffs as potentially suitable habitat for bighorn occupation, the domestic sheep conflicts must be removed or the entire bighorn population may be at risk. This conflict is being addressed; however, it will take time to resolve this issue. Until the issue is resolve, the main focus for both the BLM and the UDWR is the habitat proposed in Alternative C.
Theodore Roosevelt Conservation Partnership	288	8	Given the long-term nature of energy development, the BLM should include a plan in the FEIS for compensating hunters for the loss of big game that might occur as a result of energy development. The Moab FO must identify the hunting values of the areas being considered for energy development and then determine how subsequent development will impact the uses sportsmen make of our federal public lands during oil and/or gas exploration and development of these lands. Because energy development might keep our members from being able to hunt for the rest of their lives in areas of the Moab FO, it needs to be determined what the Moab FO will do to provide our members and UT sportsmen with alternative locations where they can continue hunting during the appropriate	Compensating hunters for the loss of big game due to energy development is not within the scope of the RMP. Upon site specific analysis for specific oil and gas project proposals, hunting values will be considered if impacted. Mitigation may be developed at the project development stage. Most public lands are open to hunting; therefore providing alternative locations on public lands is not applicable mitigation.

			lease-area determination process.	
Theodore Roosevelt Conservation Partnership	288	9	Under CEQ NEPA regulations, BLM must make use of all the best available scientific information to assess the effects of land management actions, including cumulative effects from existing, proposed, or foreseeable development projects in the resource management area. Referenced below are peer-reviewed scientific studies on the impacts on sage grouse, elk, and mule deer from vehicle traffic, roads, and oil and gas development. The information from these studies should be incorporated into the FEIS. Big Game: Rowland, M. M., M. J. Wisdom, B.K. Johnson, and M.A. Penninger 2005. Effects of roads on elk: Implications for management in forested ecosystems. March 20, 2004. Transactions of the North American Wildlife and Natural Resources Conference 69. http://www.fs.fed.us/pnw/lagrande/starkey_na/PDFs_Preprints/ms-04_Rowland.pdf Sawyer, H., R. Nielson, F. Lindzey, and L. McDonald. 2006. Winter habitat selection of mule deer before and during development of a natural gas field. Journal of Wildlife Management 70:396-403. http://www.bioone.org/perlserv/?request=get-abstract&doi=10.2193%2F0022-541X(2006)70%5B369%3AWHSOMD%5D2.CO%3B2 Sawyer, H., R. Nielson, D. Strickland, and L. McDonald. 2005. Annual Report, Sublette Mule Deer Study (Phase II): Long-term monitoring plan to assess potential impacts of energy development on mule deer in the Pinedale Anticline Project Area. Western Ecosystems	There is a great amount of data available that presents the best scientific information concerning the impacts of oil and gas development on wildlife. ALthough the BLM may not have used the specific article listed by the commentor in development of the DRMP/EIS, the BLM appreciates the commentor supplying the recommended articles. The BLM will review them and use them as needed in the development of oil and gas NEPA analyses.

			Technology, Inc. Cheyenne, WY. http://www.Ist-inc.com/PAPA_2005_report_med.pdf Sawyer, H., and F. Lindzey. 2001. Sublette Mule Deer Study. Wyoming Cooperative Fish and Wildlife Research Unit, University of Wyoming, Laramie. 51 pp. http://www.uppergreen.org/library/docs/Muledeerstudy1.pdf Wisdom, M.J., N.J. Cimon, B.K. Johnson, E.O. Garton, and J.W. Thomas 2005. Spatial partitioning by mule deer and elk in relation to traffic. March 20, 2004. Transactions of the North American Wildlife and Natural Resources Conference 69. http://www.fs.fed.us/pnw/lagrande/starkey_na/PDFs_Preprints/ms-05_Wisdom.pdf Sage Grouse: Holloran, Matt J. 2005. Greater sage-grouse (Centrocercus urophaisianus) population response to natural gas field development in Western Wyoming. PhD Dissertation, Univ. of Wyoming. Laramie, WY. 211 pp. Available at: http://www.sagebrushsea.org In Press. Walker, B.L., D.E. Naugle, and K.E. Doherty. Greater sage-grouse population response to energy development and habitat loss. Journal of Wildlife Management. Available at: http://www.forestry.umt.edu/personnel/faculty/dnaugle/pdfs/Sage-grouse%20Lek%20Analysis_JWM(in_press).pdf	

			In Press. Doherty, K.E., D.E. Naugle, B.L. Walker, and J.M. Graham. Greater sage-grouse winter habitat selection and energy development. Journal of Wildlife Management. Available at: http://www.forestry.umt.edu/personnel/faculty/dnaugle/pdfs/Sagegrouse%20winter%20habitat%20and%20energy_JWM(in_press).pdf	
Grand County Backcountry Council	289	1	Two summers ago BLM instigated a study of the kinds of recreational use that occurs around Moab. This study, a part of the National Visitor Use Monitoring Program (NVUM), found that while 49.3 percent of visitors engaged in hiking as a part of their Moab experience, and 17.9 percent engaged in cycling activities, only 7.7 percent reported driving a 4WD vehicle and 3.8 percent rode dirt bikes or ATVs. Despite this data, BLM is designating 2,642 miles of motorized routes in its preferred alternative, an approach that is detrimental to quiet users (i.e. the majority of recreationalists). These NVUM results appear to make the RMP's recreation planning priorities null and void.	See response to comments 124-2, 124-133 and 124-134.
Grand County Backcountry Council	289	2	The results of the NVUM survey have not been released to the public by BLM, and they wont' be until after the RMP's public comment period is over with. Why is BLM withholding information that would help the public make more knowledgeable comments on the RMP? The public deserves to a clear picture of actual on-the-ground use, and BLM needs to use those stats-even if they're unrefined – in its planning process. Otherwise, this recreation planning is invalid.	See response to comment 124-2.
Grand County Backcountry Council	289	3	In the travel-planning process, BLM did little ground-truthing of potential designated routes. Thus determining only the existence of the routes. Surveys were not conducted to determine on-the-ground conflicts with archeological sites, riparian areas, or other sensitive resources. Only it is BLM's job to know the resources under its charge, but under the provisions	The BLM verified the existence of over 6,000 miles of route in the Moab planning area. After the initial verification, over 2,500 miles of route were deleted from the designated system as having no purpose and need. An additional 500 miles of route were deleted because they posed resource conflicts with riparian, recreation, wildlife or cultural resources. The result is a Travel Plan

			of FLPMA, these resources must be preserved and protected. Unknowable future recreational uses should not trump unknown existing finite resources.	which designates a finite number of roads. The Travel Plan provides fewer than 2,000 acres for cross country motorized travel.
Grand County Backcountry Council	289	4	Many routes on the travel plan map (Alt C run within a half-mile or less from one another and arrive at the same destination. (See areas north of Dead Horse Point SP, Mineral Point, Gemini Bridges area, Black Ridge and Canyon Rims, for instance.) There cannot possibly be a defined purpose and need (as required by the BLM instruction memoranda on designating routes) for each of these redundant routes. If there is a low purpose and need for a route, even if there are not resource conflicts present, the route should be closed. Its mere existence is not grounds for designation. A purpose and need must be present.	Purpose and ned for the routes was determined on the ground by seeing if travel had occurred on the routes in question. In other words, if the route had been used, it was determined that there was some purpose for the route. "Superfluous" routes included over 2,500 miles of route that are not designated for travel because there was no use on these routes. Once a route was determined to have been used, a resource conflict was required in order to not designate a particular route. See Appendix G of the DRMP/EIS for a detailing of the Travel Plan process.
Grand County Backcountry Council	289	5	While travel planning looks at impacts generated by each individual route segment, the cumulative impact of a 2,642-mile route network (Alt C) is not addressed. Even though the impacts of road construction already exist out there, BLM is not taking into account he additional and probable impacts of the people traveling off-trail, not he benefit to wildlife, soils and habitat of allowing currently constructed and little-used roads to reclaim themselves.	The route network to be designated under Alt C represents a reduction of over 2,500 miles of existing route, and a reduction of over 620,000 acres that are currently open to cross country travel. The cumulative benefits to wildlife, soils and habitat of disallowing cross country travel is the largest benefit gained by travel restrictions. The BLM does make the assumption that users will stay on the designated routes. An RMP/EIS cannot analyze the effects of illegal activity.
Grand County Backcountry Council	289	6	Of specific concern are routes in Tenmile Canyon, Hell Roaring Canyon, and Spring Canyon – all tributary canyons of the Green River – and all along the Green River itself. Routes in these canyons and along the river pose threats to fragile riparian resources and numerous undocumented archaeological and historic sites. At the very least, extensive archaeological surveys should be conducted before route designation occurs in such areas.	The routes mentioned by the commentor are all constructed routes. Damage to archeological resources may have occurred at the time the route was constructed. Continued legal use of the routes does not further impact these sites. Any new routes considered for construction would require archeological clearances.
Grand County Backcountry	289	7	Routes in the Labyrinth Canyon area also conflict with current river management and use. The Price FO wrote	The Green River in Desolation and Gray Canyons, as well as from the San Rafael River to Canyonlands National

Council			the plan for the river and found it to have Wild and Scenic Values, but such values are blatantly ignored by the Moab FO which plans to designate routes along the river, from Mineral Bottom upstream. Nothing precludes motorized recreationalists from camping on the river – in direct conflict with existing river use – and motorists aren't required to follow the same rules as river users.	Park, has been determined to be suitable for Wild and Scenic River status in the preferred alternative. The existence of routes along the Green River does not disqualify the river for Wild and Scenic status. The route from the Mineral Bottom boat ramp upstream to Hell Roaring Canyon was constructed in the 1950's. If vehicle camping should prove to be a problem in this section, it could be restricted. In the BLm's experience, very few people (either in vehicles or in boats) camp just upstream from the Mineral bottom boat ramp.
Grand County Backcountry Council	289	8	As motorized use continues to impact the river experience – and many visitors stop running the Green for a quieter experience elsewhere – local businesses that rely on river runners (shuttles, equipment suppliers, guide services, etc) will be adversely impacted, negating the benefit of dollars motorized use might bring to town.	The BLM has monitored vehicle use along the Green River (at Spring Canyon) and has not found this use to be excessive. There is far more vehicle use on the White Rim Road in Canyonlands National Park (along the Green River). The BLM is aware of the economic values that river running (including the Green River) brings to the local economy.
Grand County Backcountry Council	289	9	Also on the subject of local business, BLM makes blanket assumptions about the economic impacts of its plan (i.e.: that more motorized access and extractive industry opportunities will enhance Moab's economy) with no study to back up these postulations. In fact, in looking at the NVUM data, more motorized use and extractive industry will drive away the bulk of Moab's visitors who come here for a quiet, natural experience.	See response to comments 124-133 and 124-134.
Grand County Backcountry Council	289	10	As the BLM turns more backcountry areas into frontcountry managed recreation sites (Alt C creates five new campgrounds in areas farther afield than current sites), visitors are setting up camp and recreating farther away from Moab and are less likely to even come into town and spend money.	The BLM does not intend to detract business from Moab. The campgrounds that are the closest to town fill up first -- campgrounds that are further afield will undoubtedly prove to be popular only when all sites near town are full. The campgrounds proposed in Alt C are still well within the range of Moab, which is still the only place near by in which to spend money.
Grand County Backcountry	289	11	Alternative C identifies only 47,761 acres of roadless backcountry that should be managed to preserve	Chapter 4 of the DRMP/EIS points out that, of the 266,485 acres of wilderness characteristics lands, over

Council			wilderness character while 266,485 acres of wilderness-quality land are identified in the RMP. Why should over 200,000 acres with wilderness character be sacrificed?	40% of these are protected through no surface occupancy stipulations in the Preferred Alternative. For instance, while Gooseneck and Shafer are not labeled "WC" in the preferred alternative, they are protected through ACEC designation, managed as no surface occupancy for oil and gas leasing and all other surface disturbing activities, and thus are not "sacrificed" in Alt. C.
Grand County Backcountry Council	289	12	Mill Creek is not recognized as eligible for Wild and Scenic Designation. This is a popular gem close to town that deserves recognition and protection.	Both the North and South Forks of Mill Creek are proposed to be managed as an ACEC, and as no surface occupancy for oil and gas leasing and other surface disturbing activities. In addition, portions of the North Fork of Mill Creek are contained within the Mill Creek WSA. These two designations are sufficient to protect the resources of Mill Creek in the preferred alternative.
Grand County Backcountry Council	289	13	BLM currently does not have the staff or resources to enforce any regulations outlined in the RMP. If the resource area is to be effectively managed, there needs to be a greater on-the-ground presence.	Enforcement is not a planning issue. The BLM assumes that it will be given the staff needed to enforce its regulations.
Grand County Backcountry Council	289	14	Although it is a moot point now, the 90-day comment period was entirely too brief to allow the average public time to peruse the draft RMP. Furthermore, the comment period occurred largely during local business owners' busy fall season, leaving outfitters, restaurateurs, and other affected parties with little time to devote to the document.	See response to comment 124-1.
Sportsmen for Fish and Wildlife	296	1	The bighorn herd in the "Rattlesnake herd" is expanding east past Hay Canyon and Cottonwood Canyon, and this RMP does not adequately address the current and future expansion of this bighorn herd, east to the Colorado Border, nor does this proposed alternative adequately prevent the potential destructive loss of the entire herd of 250 plus bighorns. The BLM has specific guidelines requiring the separation of wild sheep and domestic sheep, and there are at least two domestic sheep allotments in the ledges and bighorn habitat that must be addressed, that the current RMP fails to address.	The DRMP/EIS encourages the conversion of sheep allotments to cattle allotments. Furthermore, at the time of the permit renewal, the issue of livestock class may be addressed. It would be consistent with the RMP to convert these allotments to cattle allotments.

Sportsmen for Fish and Wildlife	296	2	There needs to be an adequate mechanism in place for future hunting guides and outfitters to be able to obtain the appropriate permits from the BLM to be able to guide hunters on lands within the RMP.	Hunting permits are granted through the Special Recreation Permit process out;lined in Chapter 2. These permits continue to be issued in accordance with Handbook 2901-1.
Sportsmen for Fish and Wildlife	296	3	Since the BLM planning process started, and draft alternatives identified, President Bush issued an Executive Order on August 16, 2007, directing federal agencies to: a) evaluate the effect of agency actions on trends on hunting…And implement actions that expand and enhance hunting opportunities for the public b) consider the economic and recreational values of hunting in agency actions c) manage wildlife and wildlife habitat on public lands in a manner that expands and enhances hunting opportunities d) work with the states to manage and conserve game species and their habitats in a manner that respects private property rights and state management authority e) establish short and long term goals to foster healthy and productive populations of game species and appropriate opportunities to hunt those species	Nothing in the DRMP/EIS is inconsistent with this Executive Order.
Sportsmen for Fish and Wildlife	296	4	The Utah DWR and Utah Wildlife Board will most likely approve a Bison Management plan for the Book Cliffs on Nov. 28, 2007, and this RMP must recognize this new addition of an animal on these lands and assure adequate forage for Bison in the future.	The DRMP/EIS states that the BLM would work with the UDWR on plans for reintroductions.
Sportsmen for Fish and Wildlife	296	5	Since the last RMP, the Utah DWR and BLM have approved a plan for dramatic expansion of the elk and deer herds, along with flocks of turkey and Bison in the South Book Cliffs portion of the RMP area. This RMP needs to ensure that sufficient forage is made available for such herd expansion.	Forage allocation decisions are made using Standards for Rangeland Health and Guidelines for Grazing Management at an allotment level.
American Motorcyclist Association	302	1	We suggest that they [Moab Field Office] continue to look for opportunities to streamline and simplify the permitting process within the RMP. For example, the	The Dee Pass motorized Focus Area is identified for competitive events in Alts C and D of the DRMP/EIS. Any routes not specifically identified on the Travel Plan

			Bookcliff Rattlers have funded several archeological inventories. Those routes should be identified in the RMP as being available for competitive events under standard stipulations.	accompanying the DRMP/EIS may be considered on a site-specific basis at a later date (see pg. 2-48 of the DRMP/EIS).
American Motorcyclist Association	302	2	Cottonwoods are found all over the Moab Field Office, including along the Colorado River corridor where “non-OHV use” is intensive and impacting soils near mature and young cottonwood trees. Yet the Draft Plan suggests no fencing in these areas. If BLM is concerned about the cottonwood trees, this concern should in fact be addressed in the RAMP.	See response to comment 208-3.
American Motorcyclist Association	302	3	Fees at White Wash Sand Dunes: The AMA strongly opposes the proposed fee system at White Wash Sand Dunes in Alt C and D. We question the need to implement a fee system at White Wash and believe a fee system will be difficult to implement because of the distance from the Moab Field Office and the ease of access to Dunes and nearby trails. That is in fact one of the most common reasons fee systems fail, and it was one of the main reasons Congress passed the Federal Land Recreation Enhancement Act (FLREA).	See response to comment 123-10.
American Motorcyclist Association	302	4	The travel plan alternatives along the Ruby Ranch Road hear White Wash have not proposed to designate any routes to the existing campsites along the road. So in all of the alternatives you close nearly all of the existing camping opportunities by default. This plan cannot be successfully implemented, and clearly demonstrates the flaw in attempting to limit vehicle camping to designated sites only.	The open area to the west of White Wash Sand Dunes has been expanded to accommodate dispersed camping. See response to comment 120-86.
American Motorcyclist Association	302	5	The DEIS does not sufficiently analyze the impacts to dispersed camping, nor does it provide a wide range of Alternatives to address dispersed camping. If BLM is taking site specific actions such as closing campsites, the public deserves the opportunity to comment and suggest alternatives to these closures.	See responses to comments 123-8 and 123-9..
American Motorcyclist	302	6	Insufficient quantity of OHV routes: all of the action Alternatives fail to supply a sufficient number of OHV	See responses to comments 123-13 and 208-8.

Association			routes to meet existing demand.	
American Motorcyclist Association	302	7	The AMA understands the reluctance to consider “new” routes for inclusion within the Travel Plan as described in the DEIS. However, this problem cannot be addressed without some process to consider adding routes to the Travel Plan, either in the FEIS or under subsequent site specific planning.	See responses to comments 122-30 and 208-8.
American Motorcyclist Association	302	8	Wash Bottoms- The plan should allow that wash bottoms be open to OHV use.	See response to comment 122-14.
American Motorcyclist Association	302	9	AMA also requests that BLM consider an additional SRMA in the Final Plan. We believe that there is a need to plan for a motorized single-track system surrounding Wild Cow Wash beneath the Bookcliffs. This area is entirely within a gas field, which stretches from Hay Canyon to the state line, which should significantly reduce the environmental analysis required to establish a SRMA there. If the BLM lacks resources to formally establish the SRMA in the RMP process, we request that it be referenced as a potential SRMA and include guidance to coordinate with other stakeholders in an effort to conduct the process necessary to get it done.	Wild Cow Wash was not brought up during the scoping period as an SRMA. The area was not placed into SRMA status in any alternative in the DRMP/EIS. See response to comment 208-13 regarding SRMA designation of Wild Cow Wash.
American Motorcyclist Association	302	10	Wild Cow trails. Moab BLM should consider designating this trail system in the Travel Plan.	See responses to 122-15 and 122-30 regarding the addition of new routes to travel plan.
Western Wildlife Conservancy	311	1	The Moab RMP, especially under the “preferred” alternative, gives far too much weight to mineral exploration and motorized recreation at the expense of intrinsic values and the experiences of quiet recreationists.	See response to 124-9.
Western Wildlife Conservancy	311	2	WWC recommends that the entire length of the Green River within the Moab BLM District be granted wild or scenic status, including Labyrinth Canyon and the entire stretch between Swasey’s and the Colorado influence.	Large portions of the Green River within the Moab planning area have been found suitable for Wild and Scenic River designation in the preferred alternative. The portion between Swasey's Rapid and the San Rafael River confluence were not found suitable in Alt C because of the conflicts with private land.

				It should be noted that throughout its length, the Green River will be managed as No Surface Occupancy for oil and gas in the preferred alternative, thus protecting many of the outstandingly remarkable values.
Western Wildlife Conservancy	311	3	We wish to point out that the Moab RMP is inconsistent with the Price RMP with respect to this section of the Green River: The Price RMP recommends the west bank of the river for inclusion within the wild and scenic rivers system, while the Moab RMP does not. There is no significant difference between the east and west side of this river segment that would warrant this difference in status. Furthermore, the mere existence of a paved road or dirt road along a river segment or in a river corridor does not disqualify that river segment from being included in the wild and scenic river system. The presence of the road potentially affects only the classification of the river segment. (see Table 2, Appendix J, page J-10 of the classification criteria for Wild, Scenic, and Recreational River Areas.) Again, BLM seems to misunderstand this point.	The Moab BLM is aware of the inconsistency with the Price RMP. This inconsistency has been resolved as both plans move toward their final formulation.
Western Wildlife Conservancy	311	4	WWC finds the method employed by the Moab BLM for identifying possible archaeological sites-namely a computer program-to be a poor person's substitute for the real thing, which in this case would be on-the-ground surveys. Not only will a computer program inevitably fail to include some archeological resources, it cannot rank sites by importance or vulnerability. Any potential additions to the motorized trail system in the District should be held in abeyance until such surveys are completed.	The cultural model referred to in the DRMP/EIS was not a method of identifying sites, but rather a methodology for identifying those portions of the planning area where there was high, medium or low site densities. This allowed analysis of the potential impacts to cultural resources within the planning area. Travel Plan formulation is described in Appendix G. Each of the 33,000 routes was evaluated for its possible impacts to cultural resource, using Class I inventory methods. Many routes were deleted from Travel Plan alternatives due to conflicts with cultural resources.
Western Wildlife Conservancy	311	5	Mill Creek Canyon: Both forks of Mill Creek Canyon are rich with archaeological sites and should be given maximum protection.	The North Fork of Mill Creek Canyon is largely within the Mill Creek WSA. This designation means that the North Fork of Mill Creek is managed according to the Interim Management Policy for Lands Under Wilderness Review.

				The remainder of the North Fork of Mill Creek, and the South Fork of Mill Creek, are within the Mill Creek ACEC, which is designated in the preferred alternative. The area is to be managed as No Surface occupancy for oil and gas drilling and all other surface disturbing activities, providing protection for Mill Creek. In addition, all archaeological sites are fully protected by law.
Western Wildlife Conservancy	311	6	Behind the Rocks: We strongly advocate that this area be given continued protection as a wilderness study area. The entire 17,836 acres contain high archeological site density and have potential for inclusion on the National Register of Historic Places as an Archaeological District. Rock art in this area is extensive, spanning multiple cultures over thousands of years, and is acknowledged as being of national significance. We believe all the roads should be closed beyond the existing spur road to “Olk Folks Home.” Additional protection as described in Alternative B (page 2-33) is appropriate.	Behind the Rocks continues as a WSA regardless of any planning decision. In addition, 5,000 acres beyond the 12,000 acre WSA are designated an ACEC to protect relevant and important values, of which cultural resources are one. The entire area is managed as no surface occupancy for oil and gas drilling in Alt C. The Behind the Rocks area has very few routes designated within it in Alt C. The route to which the commentor refers has been removed from designation in Alt. C.
Western Wildlife Conservancy	311	7	Upper Courthouse: We recommend Alternative B for this proposed ACEC. Upper Courthouse, with its riparian areas has a high density of archaeological sites. Known sites exist near Hidden Valley, Brink Spring, Bartlett Wash, and unnamed drainages to the north. The Courthouse Rock area has already experienced vandalism to rock art panels (The Blue Buffalo was rubbed out several years ago) and recreational use in this area continues to be high and is increasing in intensity each year. We believe the active protection of archaeological sites needs to extend beyond grazing to also include visitation.	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. The BLM’s ACEC Manual (1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the DRMP/EIS. Alternative B analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the PRMP/FEIS will be provided in the Record of Decision (ROD). The analyses that will provide the rationale for the final decision to designate or not designate an ACEC can be found in Chapter 4 of the PRMP/FEIS. See also response to comments124-68 and 124-82.

				Archaeological damage violates Federal law. Violations of law are beyond the scope of the land use plan under consideration.
Public Lands Equal Access Allaince	346	1	Designated routes called “training trails” offer a significant length of sustainable trail within a confined area that provide the experience these young riders are seeking. Off trail riding has become almost non-existent since these trails were put in place. Some provision for addressing this issue should be mentioned in Appendix G.	See response to comment 120-81.
Public Lands Equal Access Allaince	346	2	Many designated OHV routes cross properties owned by SITLA. To avoid having these routes closed in the future by sale of these lands, rights-of-way should be placed in public ownership. Programs and funding are in place to accomplish this goal. This opportunity should be noted in the plan.	See response to comment 120-82.
Public Lands Equal Access Allaince	346	3	Requiring fences around the cottonwood trees and “water sources” is both impractical and unnecessary.	See response to comment 208-3.
Public Lands Equal Access Allaince	346	4	In several cases, motorcycle trails shown in Alternatives C and D have been used for several years, and are currently being used, by ATVs and or 4x4s as integral segments of longer loop routes. Most all of these routes have been used by ATVs, from the mid 1980s. We feel these routes should be designated as motorized, or ATV/OHM routes, with some as 4x4. When we contacted your office we were told that the ATV community did not as for any routes. This is not true PLEAA used your TRIMBLE GPS and did this inventory for the Moab Field Office. Putting these routes as motorcycle only on this draft RMP shows a bias and a predetermination of the outcome.	See response to comment 120-90. The commentor worked as a short term volunteer for less than a week well before initiation of travel management planning undertaken in conjunction with the DRMP/EIS. The Trimble GPS was returned in poor condition to the Richfield BLM office and the data were not utilized.
Public Lands Equal Access Allaince	346	5	The initial inventory and subsequent designation of motorcycle routes was incomplete. Recommended additions are also shown on the attached map.	See responses to comments 122-15 and 122-30.
Public Lands Equal Access	346	6	We agree duplicate routes are generally not needed. However, they may be desirable when they provide	Alternative riding experiences were considered when formulating the alternatives to the Travel Plan

Allaince			different riding/driving experiences or require very different user skills. Also, washes are not always reliable routes because of weather events. If these washes become temporarily impassible, the alternative route would still allow a person to complete a loop. A case in point would be the road adjacent to Salt Wash.	accompanying the DRMP/EIS.
Public Lands Equal Access Allaince	346	7	We have looked at your maps and can't tell if the campsites we use are going to be open or closed.	No new campsites have been closed in the DRMP/EIS. The open area near the White Wash Sand Dunes has been expanded to accommodate the camping that occurs to the east of the Ruby Ranch Road (see response to comment 120-83). The commentor provides no specifics about campsites that he uses.
Public Lands Equal Access Allaince	346	8	Yellowcat/The Poison Strip/Dome Plateau is increasingly popular for four wheeling and ATV riding. Designating a SRMA there would utilize the dense network county and of mine roads that already exist.	See response to comment 122-38.
Public Lands Equal Access Allaince	346	9	Page G11, 7.1 OHV Designation Criteria, 2. Wildlife: Does the reference to wildlife habitat include habitat for all species or is it intended to apply to habitat for more significant species or groups of species? This should be clarified.	This wording is contained in the Federal regulations at 43 CFR 8342.1. The Moab Field Office has no authority to clarify the wording of federal regulations.
Public Lands Equal Access Allaince	346	10	Page G11, Public Safety: The term "extreme" should be further defined. What is an extreme hazard to one person may not be extreme to another, depending on their riding/driving skills.	The wording on page G-11 is directly from the BLM Manual at 8340. The Moab BLM has no authority to change the wording of BLM Manuals.
Public Lands Equal Access Allaince	346	11	Moab Jeep Safari Trails. When we take our ATV/dirt bikes, we enjoy riding in the White Wash Sand Dunes, 10 Mile Wash, Little Grand Wash, the Tubes, Red Wash, Oil Well Wash, Salt Wash.	In Alt. C of the DRMP/EIS, White Wash Sand Dunes remains available for open ATV/dirt bike travel. The other routes mentioned by the commentor are available in one or more alternatives of the DRMP/EIS.
	408	3	Failure to adequately consider beneficial impacts when considering whether Alternatives B, C, and D significantly impact the environment when additional acres are closed or limited to OHV use, or when fewer miles of routes are designated. The agency is required to consider both the adverse and the beneficial effects	See responses to comments 408-1 and 408-2.

			likely to occur when fewer acres are closed or limited to OHV use or when more miles of routes are designated. The DEIS fails to evaluate the beneficial impacts of an alternative where areas that are closed or limited are more than Alternative A but significantly less than the proposed alternatives. For example, the number of miles designated for OHV use in Alternative B, C, and D are similar in mileage to each other and all drastically differ in number of miles designated when compared to Alternative A. The DIES fails to analyze the beneficial impacts on the environment which are likely to occur when access is better dispersed, as would occur with a modified Alternative C.	
New Mexico OHV Alliance	411	1	Existing campsites should remain open unless closure was determined necessary through individual assessment and a lawful public planning process. The Final RMP must include full public involvement in any decisions to create “restricted camping areas” or “controlled camping areas.”	See response to comment 123-8.
New Mexico OHV Alliance	411	2	Travel Plan Alternative D: This alternative fails to provide enough motorcycling opportunities. The analysis is deficient since you do not have an inventory of single-track routes. Therefore, the BLM should continue accepting data on existing routes and consider them for implementation.	See response to comment 122-15.
New Mexico OHV Alliance	411	3	Unused Roads: Roads and trails that are not used in the final version of the system should be retained in the inventory for future consideration. Some may be needed as re-routes, loop connectors, and to provide more recreation opportunities for the future needs. The unused routes should NOT be made to ‘go away,’ or disappear from the records as if they never existed, or as if they don’t continue to exist. They should be classified as currently closed but retained in the system inventory.	The BLM worked with Grand and San Juan counties in developing the Travel Plan alternatives. Grand County and the BLM agreed that 2,500 miles of largely unused routes had no purpose and need and should not be designated for motorized travel. If any of these routes is found to be needed in the future, it could be added to the Travel Plan using site specific NEPA analysis. See response to comment 122-30 for the process of adding new routes.
New Mexico OHV Alliance	411	4	Fee System: Any fee area proposal must now be reviewed under the Recreation Enhancement Act	See response to comment 123-10. Wording has been added to clarify that fees would be instituted consistent

			(REA). Imposition of fees on unimproved areas, without the specific improvements listed in the REA is not allowed under the new act.	with the Federal Recreation Land Enhancement Act (FLREA).
Rising Sun 4x4 Club	413	1	Managing increasing acreage of BLM land as 'wilderness-like' not only is a violation of the BLM's mandate, but marginalizes legitimate motorized users into a smaller 'piece of the pie' with increasing per-mile impact. Ironically, this degrades the remaining OHV areas even more.	See responses to comment 121-10, 120-8 and 121-63.
Rising Sun 4x4 Club	413	2	Management objectives that use such things as primitive recreation zones, Areas of Critical Environmental Concern, and so-called "areas with wilderness character" to create a de-facto Wilderness management are unlawful. Managing increasing acreage of BLM land as 'wilderness-like' not only is a violation of the BLM's mandate, but marginalizes legitimate motorized users into a smaller 'piece of the pie' with increasing per-mile impact. Ironically, this degrades the remaining OHV areas even more.	The BLM manages for multiple uses, including all types of recreation, Areas of Critical Environmental Concern and non-WSA lands with wilderness characteristics. See response to 121-10 and 120-8 for a discussion of wilderness characteristics. The BLM has provided many opportunities for motorized users within Alt. C of the DRPM/EIS.
Rising Sun 4x4 Club	413	3	Please do NOT put the Rabbit Valley/Westwater area under custodial management with a hiking and equestrian emphasis.	The Rabbit Valley area is part of the Utah Rims SRMA, which is designated in Alt C for motorized and mechanized trail use. The Westwater area (outside the Wilderness Study Area) is within the Moab Extensive Recreation Management Area (ERMA). It is not managed for a hiking and equestrian emphasis. All recreation activities can occur in the ERMA consistent with the Travel Plan.
Rising Sun 4x4 Club	413	4	An existing and documented route exists on the southern side of the Colorado River within the boundaries of the Westwater WSA. The route begins outside the WSA and terminates near Star Canyon. This route has been open for decades, and it appears on USGS topographical maps from the 1970's.	The Star Canyon route was within the Travel Plan inventory. Grand County recommended to the BLM that the route be removed from all alternatives because it had no demonstrated purpose and need. The BLM included the Star Canyon route in Alt D; the BLM eliminated the Star Canyon route in Alts. B and C. The BLM knows that the Star Canyon route is on the USGS map. It is an inventoried way within the

				Westwater WSA and presents conflicts with wilderness values.
Rising Sun 4x4 Club	413	5	Several short route segments associated with permitted Easter Jeep Safari routes are missing from the proposed Travel Plan maps. The segments are located on Flat Iron Mesa, Strike Ravine, and 3-D. We understand that the Utah Four Wheel Drive Association has been informed this is merely an accidental omission, but we would like to formally request that these segments be included on the final maps.	See response to comment 206-11,
Rising Sun 4x4 Club	413	6	Any fee system should require the full involvement of the Recreation Fee Advisory Council, BLM's Resource Advisory Council, and the affected user group.	See response to comment 123-10.
Rising Sun 4x4 Club	413	7	The current proposal is unworkable because it confines a huge amount of vehicle use into a very small area and the area's boundaries are not well defined and cannot be easily identified on the ground. This will have the ironic effect of increasing environmental impact mentioned earlier, as well as creating user confusion.	The commentor does not explain exactly what the small area is. The BLM assumes that it is White Wash Sand Dunes. For a discussion of the open area at White Wash, see response to comment 123-35.
Rising Sun 4x4 Club	413	8	BLM's open area at White Wash Sand Dunes should include the popular and challenging hill-climb on the West of the Sand Dunes. It should also be located along easily identified geologic features, or preferably along boundary roads of Ruby Ranch Road on the West, Blue Hills Road on the North, and Duma Point/Ruby Ranch (back way) on the East.	See response to comment 123-35. In addition, the White Wash area has been expanded to the west to include the camping area and the hill climb mentioned by the commentor. See response to comment 120-83 for discussion of the expansion of the White Wash open area.
Rising Sun 4x4 Club	413	9	How should recreational uses be managed to limit conflicts among recreational users? BLM's draft plan indicates that your answer is to create "exclusive use zones." This is not the only answer to user conflict, and is, in fact, unworkable. Currently there is a large amount of Wilderness land appropriate for 'quiet use' advocates, but creating "exclusive use" zones in areas currently open for OHV use will concentrate increasing use on a smaller footprint, increasing impact.	Focus Areas are not intended to be for the exclusive use of any one group of recreationists. The BLM's Land Use Planning Handbook (H-1601-1) directs the BLM to designates Recreation Management Zones (which are called focus areas in the Moab DRMP/EIS). These areas are defined on pg. 2-18 in the DRMP/EIS as those that "emphasize particular types of redreation activities while still allowing for other uses in accordanced with the Travel Plan. Focus areas are established as a mechanism for enhancing specific recreation opportunities through facilities and education."

Rising Sun 4x4 Club	413	10	Keep Behind the Rocks area, OHV trails in Pritchett Canyon, also near Golden Spike/Gold Bar Rim, Rusty Nail 4x4, Goldbar/Corona Arch open to motorized vehicles.	The Golden Spike, Pritchett Canyon, Rusty Nail and Goldbar Rim routes are in the Travel Plan for Alternative C, the preferred alternative. There are additional routes in the "Behind the Rocks Area", but without specifics, it is impossible to say which ones the commentor refers to. The route to Corona Arch is confined to hikers only.
Rising Sun 4x4 Club	413	11	Also at issue is the lack of information about campsite closures; the analysis does not tell us how many campsites would be closed under each alternative. This makes it very difficult to gauge the impact of the alternatives on dispersed camping. For instance, it appears that the Appendix E rule change would effectively eliminate all camping in the Bartlett Wash area, at least in the interim until and if it is developed. We support a policy where existing campsites are open unless determined closure was necessary via lawful public planning process including specific impact analysis. This should include full public involvement with adequate information specific to each area.	See responses to comments 120-86 and 123-8. Bartlett Wash is available for dispersed camping presently, although campers are restricted to designated sites and are required to carry out solid human waste. Camping at Bartlett Wash remains as is under the DRMP/EIS; should a developed campground be proposed at Bartlett Wash, site specific NEPA analysis would be undertaken. Full public involvement would be part of the NEPA analysis.
Rising Sun 4x4 Club	413	12	We do believe that all SRMAs with a motorized focus should include direction regarding when and how additional or expanded routes/areas would be provided should there be a need.	The DRMP/EIS specifically allows for routes to be added to the Travel Plan at later dates (see pg. 2-48 of the DRMP/EIS). See also response to comment 120-30.
Rising Sun 4x4 Club	413	13	Please clarify, up front, via signage or other on-the-ground means, that SRMA may emphasize a particular use without excluding other uses.	Signing on the ground is not a land use planning decision. See Chapter 1 of the DRMP/EIS on page 1-11, which clarifies which actions are administrative ones.
Rising Sun 4x4 Club	413	14	The BLM should also consider a SRMA in the Yellowcat area. Yellowcat is increasingly popular for four wheeling and ATV riding.	See response to comment 122-38.
Utah Rock Art Research Association	415	1	We believe that the BLM has done a poor job of cultural resource management associated with this RMP. We are especially concerned with the use of computer modeling to determine cultural resource locations. A limited percentage of lands within the MPA have been physically inspected for the presence of cultural resources, and such an effort is cost prohibitive as part of preparing the RMP. Therefore, the relative site	The commentor misunderstands the use of the computer modeling of cultural resources. The model (described on pg. 4-30 of the DRMP/EIS) was developed by a professional BLM archaeologist, and used only to "analyze potential relative involvement of cultural resource sites in management decisions." It is not used to predict site numbers involved in decisions, nor is it a replacement for full inventory for sites prior to surface

			density potential for areas within the MFO was estimated using environmental factors known to influence site location and type. All areas of the MFO were then ranked as having either high, medium, or low potential for containing cultural sites. (page 3-19) This problematic approach does not acknowledge that people and their archaeological footprint are not entirely predictable. Nor does it consider the significance of sites, only density. We recognize that complete surveys have not been done. However, there has been extensive documentation of cultural resources. “The MPA has approximately 5,200 inventoried cultural sites.” (Page 4-253) It is not clear to us that these documented site locations have been given consideration in the RMP. We do not support a decision-making process which is not based on actual rock art and archeological site inventories.	disturbance. In other words, the model was used to make comparison among the alternatives as to which alternative would be most beneficial or potentially adverse to cultural resources. The model was constructed by using the 5,200 known sites in the Moab planning area, and by constructing polygons of "high", "medium" or "low" potential for cultural resources. These areas were then compared by alternative to see which alternative affected high and medium areas more intensively. Site specific decisions in the DRMP/EIS (for instance, route designation) were made using the actual cultural resource inventories that have been performed in the Moab planning area. As stated in the DRMP/EIS, all future surface disturbing activities will be required to have an archaeological clearance. See also response to comment 124-25.
Utah Rock Art Research Association	415	2	The RMP is bereft of information regarding the amount of protection that will be provided to cultural resources. Pages 2-2 through 2-6 provide helpful information regarding the coverage of Off-Highway Vehicle designations, Special Recreation Management Areas, Oil and Gas Leasing and Development, River Classifications, Wildlife, and Wilderness under the various proposed alternatives. No information is provided for cultural resources. There is no way to determine what percentage of the modeled high, medium, or low site probability acreage (table 3-7, page 3-19) is covered by an ACEC or special management consideration. Nor is there anyway to determine how many of the 5,200 inventoried cultural sites are protected.	All cultural sites are protected by law, and will continue to be protected regardless of decisions made in this RMP effort. Three ACECs, Ten Mile, Behind the Rocks and Mill Creek, were designated in the preferred alternative to provide additional protection for cultural resources.
Utah Rock Art Research	415	3	Maps need to be larger with better defined borders and known archeological sites need to be considered in the	Known archeological sites were considered in the DRMP/EIS. However, these sites were not placed on a

Association			management plan.	map for public viewing in order to protect the integrity of the site. The maps in the text of the DRMP/EIS are also available on the internet. In their electronic format, it is possible to enlarge and zoom in on each of the maps on the DRMP/EIS.
Utah Rock Art Research Association	415	4	We believe all roads should be closed beyond the existing spur road to “Old Folks Home.”	The BLM believes that the commentor is referring to the archeological site near the end of the Moab Rim route. The route past the existing spur road to this site has been closed to motorized use in Alt C. The route remains open to hiking and mountain biking use.
Utah Rock Art Research Association	415	5	The current maps appear not to include the rock art at Crescent Junction. These are significant sites and should be included.	The maps in the DRMP/EIS do not include rock art sites. The BLM is aware of the rock art at Crescent Junction. No disturbance of cultural sites is allowed under any alternative. All surface disturbing activities would be required to have a cultural clearance. It is required to avoid or fully mitigate cultural sites.
Utah Rock Art Research Association	415	6	It is difficult to determine the boundaries of this district [Canyon Rims] from the maps provided.	The maps can be enlarged in their electronic format. The boundary of Canyon Rims SRMA is along the cliff above Lockhart Basin to the west, along the rim above Kane Creek to the north, along U.S. Highway 191 to the east, and along the grazing allotment boundary and the rim of Harts Draw to the south.
Utah Rock Art Research Association	415	7	Mill Creek Canyon: The supplied maps are insufficient to indicate whether the culturally rich uplands are included.	The Mill Creek Canyon ACEC includes much of the culturally rich uplands. This ACEC has been established to protect the cultural resources found in this area. The maps can be enlarged in their electronic format.
Utah Rock Art Research Association	415	8	Upper Courthouse: We believe the active protection of archaeological sites needs to extend beyond grazing to also include visitation.	The BLM protects all cultural sites. This is required by law. In the Upper Courthouse area, cultural resources have been fenced to protect them from OHV users. Dispersed campsites have not been designated because they are on cultural sites. The imposition of SRMA management, as is provided for in Alt C, will allow the BLM to impose other restrictions on visitors for the protection of cultural resources.

Utah Rock Art Research Association	415	9	We do not see any proposed protection under ACEC for the BLM land along the south side of the Colorado River downstream from Moab and up Kane Creek. This area is dense with rock art and other archeological sites of national register quality. It is being documented as part of the proposed Wall Street rock art district. This area receives high visitation, is experiencing non-approved off-road vehicle use, and needs appropriate protection and interpretation at highly visible rock art sites. We believe this area from the Moonflower Site up canyon for approximately 6.5 miles needs to be protected under an archeologically focused ACEC. Page 2-8 proposes scientific restoration of archeological sites from Highway 191 to Kane Creek canyon. We see no reason to stop at Kane Creek Canyon and suggest that this restoration continue within our proposed area.	The Kane Creek Road is in the Behind the Rocks ACEC, which is proposed for the protection of cultural resources. Travel is limited to designated routes in the DRMP/EIS, although it should be noted that this has been the case in this area since 1992.
Utah Rock Art Research Association	415	10	Seven Mile Canyon is an area with many national register quality rock art sites spanning thousands of years. The Inestine Man site is one of the finest examples of Barrier Canyon Style and world famous. This extraordinary site needs to be part of a thoughtful management plan. The campground located at the mouth of the canyon and the road through the canyon recently washed out. We recommend that this road and campground should not be reestablished. We also recommend that this area be included in an archeologically focused ACEC.	Seven Mile Canyon, although not proposed as an ACEC, is specially mentioned in the DRMP/EIS. It is prioritized for Class II and Class III surveys in Alt. C. The camping sites at the mouth of the canyon have been decommissioned. It is now illegal to camp in the mouth of Seven Mile Canyon. This has been imposed to protect cultural resources.
Utah Rock Art Research Association	415	11	Hellroaring Canyon. An unauthorized off-road vehicle road has been created from the Green River to the Barrier Canyon Style pictograph site in this canyon.	The route in Hell Roaring Canyon was constructed during the uranium mining of the 1950's. Off road travel off this route is illegal and will continue to be so under the DRMP/EIS, which limits travel to designated routes.
Utah Rock Art Research Association	415	12	Klondike Bluffs. It is not clear from the maps if there is any special protection for the rock art sites located at Klondike Bluffs outside of Arches National Park. We	All rock art sites in the Moab planning area were not proposed as cultural ACECs. All rock art is protected by law. The Klondike Bluffs area is proposed to be managed

			recommend an archeological focused ACEC for this region if it is not protected.	as part of the Lavyrinth Rims/Gemini Bridges SRMA, which will allow the BLM to manage recreation users more directly.
Utah Rock Art Research Association	415	13	We are concerned about a road segment that bisects an area with a high archeological site density. It is south of Levi Well located in the south half of section 25 Township 23S, Range 18E.	All routes designated as part of the Travel Plan were analyzed for cultural resource conflicts. The BLM professional archeologist noted which routes posed unacceptable cultural resource conflicts. These routes were not designated in the preferred alternative unless the purpose and need outweighed the cultural conflict. Any routes included in the Travel Plan may be reconsidered at a future date for designation or non-designation.
Utah Rock Art Research Association	415	14	Rock Art Nomination Districts, Mill Creek Canyon needs to be added to this list.	The Mill Creek Rock Art is sacred to many Native American tribes. These tribes do not wish this rock art to be publicized by nomination to a Rock Art district.
Utah Four Wheel Drive Association	420	1	An existing and documented route exists on the southern side of the Colorado River within the boundaries of the Westwater WSA. The route begins outside the WSA and terminates near Star Canyon.	See response to comment 413-4.
Utah Four Wheel Drive Association	420	2	Several short reroute segments associated with permitted Easter Jeep Safari routes are missing from the proposed Travel Plan Maps. The segments are located on Flat Iron Mesa, Strike Ravine, and 3-D. We have been informed this is merely an accidental omission, but would like to formally request that these segments be included on the final maps. Maps detailing the missing segments are included at the end of this letter. [See attachments]	See responses to comments 206-11 and 206-17.
Utah Four Wheel Drive Association	420	3	The Gemini Bridges natural arch is one of the few natural bridges in the entire country that can still be driven. We feel that this route offers a unique driving opportunity that will be lost of the proposed closure is enacted. Please include this route in the Final RMP and Travel Plan.	See response to comment 206-14.
Utah Four Wheel Drive	420	4	White Wash Sand Dunes. This area is of particular concern to our members. First, the open travel area as	See response to comment 120-83, explaining that the open area has been expanded to the west to

Association			proposed under Alternative C is too small. The open travel area should be expanded, and determined by easily identifiable geological boundaries or existing roads to make adherence to the new restrictions easy for all users. Second, the open travel area should include the challenging hill climb on the northwest portion of the sand dunes. Third, we oppose the proposed fee system described in Alternatives C and D. The proposed system seems to indicate that individual use and camping permits would be required for individuals and groups of any size. We strongly oppose such a fee system, and would encourage that a more appropriate fee system be established if it is necessary.	accommodate camping. This expansion would include the challenging hill climb on the west side of the dunes. See response to comment 123-10 for discussion of a proposed fee system at White Wash.
Moab Area Climbers Association	434	1	The map for Option C shows a number of areas, most notably upper Kane Creek and Tusher Canyon/Mill Creek, as VRM-1. These areas are important to climbers. As such, we of course want them to be as beautiful as possible. Unfortunately, the VRM-1 status, being the highest level of visual resource management, could be construed in the future to curtail any activity, including climbing. If the VRM-1 status would mean changing the conditions that make climbing safe and enjoyable in those areas, then we are opposed to it.	Kane Creek and the Tusher Canyon Mill Creek area are both designated as VRM II in the preferred alternative (Alt. C). The Behind the Rocks WSA is VRM I.
Moab Area Climbers Association	434	2	To have such a large area be deemed off-limits for a species [Mexican Spotted Owl] that none of us have ever seen seems out of character with the way a habitat management plan is established. If this area is deemed critical to the currently nesting birds, we understand the need for a limited closure. However, it would not be acceptable to close such a large section of cliff simple because it might be a future nesting area. A copy of the habitat management plan, which would explain how the areas were designated to be so large, would greatly aid in the public's understanding.	No specific recreation activities are proposed to be curtailed because of Mexican Spotted Owl habitat. The Protected Activity Center for the nesting pair of owls in the planning area is not in a popular recreation area. No sections of cliff have been proposed to be closed. The habitat management plan for Mexican spotted owl is administered by the U.S. Fish and Wildlife Service.
Moab Area Climbers Association	434	3	The MACA would like to see the DRMP formally acknowledge that climbing is a legitimate use of the public lands around Moab.	The DRMP/EIS mentions climbing several times throughout the document.(e.g., p. 3-80). In addition, Focus Areas are proposed specifically for climbing

				activities. Climbing is acknowledged as a legitimate use of public lands.
Moab Area Climbers Association	434	4	We also feel that certain areas in Kane Creek and on Potash Road are popular enough that toilet facilities are warranted. We would be able to work with the BLM, as the Access Fund and Friends of Indian Creek have done in the past, to help aid the building of these much-needed facilities.	Installing toilet facilities is not a land use planning decision.
Environment Preservation Foundation	478	1	…the Draft RMP/EIS completely overlooks the growing body of research completed in neighboring Wyoming that demonstrates unequivocally that impacts go way beyond just the surface of roads, utility corridors, and well pads. As an example, the studies show that a single 10 acre well pad will result in significant "avoidance behavior" for a radius of nearly 1 mile around the pad by a variety of wildlife species. Linear impacts from recreation trails, OHV trails, mineral development access roads and utility corridors, and grazing activities have the same effect. Computations of lost habitat based only on direct surface disturbance are completely inadequate when considering the altered behavior brought about by these developments and the loss of critical habitat is far greater than suggested in the various tables.	See respone to comment 124-39, 124-40, 1025-14, and 1025-15. The commentor has not provided the specific study mentioned in the comment.
Environment Preservation Foundation	478	2	To address the limited direct surface impact only, the BLM turns to standard Timing Limitations as a mitigation measure (see Section 3.8.1). In addition, the BLM suggests the possibility of vegetation manipulation, and/or restoration of surface impacts by re-vegetation over the lifetime of a given project such as mineral development, but that does not address adequately the loss of habitat from other activities that have indefinite lifetimes such as public hiking/OHV trails, roads, grazing and the like. Nor does Timing Limitations or restoration of surface impacts over several years life of a project such as oil or gas development address the much larger impact resulting	See response to comment 124-7.

			from avoidance behavior that increases habitat loss.	
Environment Preservation Foundation	478	3	When any project is approved and carried out, the impact is immediate, the habitat lost. It takes years to replace or restore lost habitat but the impact on the wildlife is immediate. Loss of habitat from direct impact and avoidance behavior result in concentrated competition in restricted habitat by more wildlife. Timing Limitations and long-term vegetation manipulation have not proven to be effective in addressing the “immediate” impact to wildlife and the BLM needs to give consideration in the RMP/EIS to other mitigation measures such as permanent off-site habitat development in conjunction with and prior to project approvals to off-set the immediate and understated impacts from those developments.	See response to comment 120-33.
Environment Preservation Foundation	478	4	There is some information on projected emissions from a variety of equipment used in a variety of ways in the Draft in Section 3.2. What the section does not address is the fact that most of the sources of hazardous emissions are small individual sites like compressors at well sites. Under existing law, emission control equipment at these locations can be shut down and not monitored if the source falls under certain thresholds of emissions.	See response to comment 214-10.
Environment Preservation Foundation	478	5	Given the projections for continued growth in the mineral extraction activities within the Moab District, it is safe to assume that single sources of undesirable emissions will increase significantly. The Draft fails to consider the cumulative impact from these sources from what is really a single source or project (oil and gas extraction). The BLM needs to take a broader view of the cumulative impact from these sources and insist upon the use of newer technologies that are now coming available to reduce or eliminate these hazardous air pollutants.	See response to comment 214-10 and 214-11.
Environment Preservation	478	6	While the Draft notes the need to protect surface watersheds and water resources in general, there is no	Produced water from oil and gas development was not raised as an issue during the scoping period for the land

Foundation			consideration of a significant planning issue that can result from mineral extraction such as oil and gas-produced water. Produced water is more often than not of significantly reduced quality and often contains hazardous pollutants that are detrimental to all forms of life, especially wildlife. Typically the treatment of produced water is accomplished by evaporation, treated on or off-site with filtering, or subjected to deep-well injection. All three methods have advantages and disadvantages. Impounding for evaporation or filtering can result in difficulties keeping wildlife at bay. Trucking or piping the water to off-site facilities can be expensive; impacts other habitat, can result in air quality issues, and travel safety hazards to wildlife. Deep well injection is expensive. It could result in additional impacts to air quality from high-pressure compression needs and possibly migrate into higher quality aquifers. Contamination of better quality aquifers would be nearly impossible to correct and could have negative, long-term impacts on surface waters and all biological species. The BLM needs to significantly upgrade their efforts on planning for and mitigating impacts from all activities that could have long-term detrimental effects on the water resources (ground and subsurface) within the planning area.	use planning process. See response to comment 124-7.
Center for Water Advocacy	481	1	The federal Wild and Scenic Rivers Act requires the BLM to either list as eligible or make suitablitlity recommendations as part of the RMP process regarding the above rivers and river sections before further development and impacts from man irretrievable eliminates the suitability criteria for such water bodies. In addition, during the September forum on Wild and Scenic Rivers, the BLM also told CWA that the agency will not make a recommendation in favor of suitability without local support. *Mill Creek Canyon Upper and Middle Sections, Green River through Labyrinth	The DRMP/EIS lists 14 rivers that were found eligible for Wild and Scenic river status. Alt. C proposes that the Dolores, Colorado and portions of the Green River are suitable for wild and scenic river status. The BLM has completed its suitability recommendations as part of this RMP process. Beaver Creek, Professor Creek and Onion Creek are all within areas that are to be managed to protect their wilderness charactersitics, thus affording protection to these streams. For a discussion of Mill Creek, see

			Canyon, Colorado and Dolores River, Onion Creek and Professor Creek, Beaver Creek all meet the eligibility requirements.	response to comment 289-12.
Back Country Horsemen of Utah	482	1	In general the RMP is very specific and detailed in what is planned. However, it leaves questions as to what you are planning and the expected impact on the stock use in the area. Some specific questions are: Negro Bill Canyon – This trail was originally constructed be livestock operators who utilized horses to move cattle. Under alt B, C, and D; you propose the closure of this trail to horse use. However, I cannot find the reason for this closure. Have you talked with horse users to determine If there is an alternative and will this closure block horse use from accessing other lands. There also seems to be some disconnect because you propose the designation of 2.5 miles of road for motorized travel in Negro Bill Canyon but are closing it to equestrian use. Can stock use of this canyon be determined by either improving the existing trail or constructing a new trail in the canyon?	There is no road proposed for motorized travel in Negro Bill Canyon. The BLM is aware that the trail was originally utilized for livestock operations. However, there has been no cattle grazing in Negro Bill Canyon since 1997. The foot trail currently in the canyon receives over 50,000 people per year. The trail is not maintained so that it can sustain horses. The trail was removed from equestrian use because each time a horse goes on it, the trail is severely compromised and needs repair. Horses may still access the canyon from the stock trails in the upper portions of the canyon. The only portion of the trail that is forbidden to horses is the 2 miles in the lower part of the canyon. The BLm does not believe that the need for horse use there is great, nor is there an alternative location in which to build an equestrian trail. Each and every other part of the Moab Field Office remains open to equestrian use.
Back Country Horsemen of Utah	482	2	In general the RMP is very specific and detailed in what is planned. However, it leaves questions as to what you are planning and the expected impact on the stock use in the area. Some specific questions are: The Chapter 3 Existing Environment lists Negro Bill Canyon as being limited to hiking only, while Chapter 2 Alternatives 2 states that equestrian use is discouraged in Negro Bill Canyon. Which is correct?	In practicality, Negro Bill Canyon is limited to hiking only. The RMP proposes to close the 2 miles at the very mouth of Negro Bill Canyon to horse use because of the damage that the trail sustains when it is traversed by horses.
Back Country Horsemen of Utah	482	3	In general the RMP is very specific and detailed in what is planned. However, it leaves questions as to what you are planning and the expected impact on the stock use in the area. Some specific questions are: General – Common to all the non-mechanized recreation travel section in chapter 2 states “limit non-	No other trails are closed to horses other than Negro Bill Canyon in the DRMP/EIS.

			mechanized travel on specific lands to designated trails and managed routes for resource protection purposes." No where can we find what this might refer to with the exception of Negro Bill Canyon. Chapter 3.11.1.2.1.8 Popular Hiking Trails does identify some trails that are presently open only for foot traffic. Are you planning to close additional areas or trails to horse use? If so we would request that it is done with a public process and a minimum of 30 day comment period. The public process should identify the trails being closed and the resource concerns for the closure.	
American Rivers	483	1	I was surprised to note the following: A lack of consistency between the Price and Moab decisions on suitability. Does the BLM seriously believe that one side of the Green River can be suitable for Wild and Scenic designation and the other side not? This oversight must be corrected, or clearly explained. At the very least, the BLM needs to address how it will manage one side of the Green River to protect Outstandingly Remarkable Values, yet not the other.	The Price and the Moab field Offices have coordinated on management of the Green River for suitability.
American Rivers	483	2	I was surprised to note the following: The BLM seems to misunderstand the W&S river evaluation process with regards to classification of the river segments under study. The "classification" of a river is a fact based on current river conditions: an eligible segment is "recreational," "scenic," or "wild." Once an agency has made a determination that a river segment is eligible and a classification has been determined, the BLM's Manual directs that the agency has an obligation to manage the river segment to maintain that level of classification until the status of the river is resolved. A segment's classification should not vary between one alternative and another. The classification should not be "downgraded between the eligibility study and the preferred alternative unless the	The tentative classification was established along each river segment during the eligibility review. This tentative classification is based on an inventory of existing characteristics of a river resulting from human caused change or level of development. The tentative classification is considered in Alternative B. However, because a river's tentative classification provides a framework for the management prescriptions applied within the area, some flexibility is allowed to consider a range of tentative classifications in the alternatives. Alternative C provides for a balance between protection and other land uses. Therefore, the classifications in Alternative C have been adjusted to provide for a wider range of alternatives (Manual 8351.32). The tentative classification established through inventory

			BLM can demonstrate that the quality of the river has changed to justify this downgrading, and explain how they failed to manage the river to maintain the previously determined classification.	for an eligible river will be considered in at least one alternative; however, because a river's tentative classification provides a framework for the management prescriptions applied within a river area, some flexibility is allowed to consider a range of tentative classifications in the alternatives. The BLM's Wild and Scenic River Manual (Section 8351.33C) states: "Additional alternatives may be formulated for any combination of designations and/or classifications. Whenever an eligible river segment has been tentatively classified, e.g. as a wild river area, other appropriate alternatives may provide for designation at another classification level (scenic or recreational)." Reasons for considering alternative tentative classifications include resolving conflicts with other management objectives (whether BLM's or those of another official entity), continuity of management prescriptions, or other management considerations.
American Rivers	483	3	I was surprised to note the following: The RMP finds any eligible river in an area of proposed development to be unsuitable, essentially claiming that this foreseen development precludes designation. This is an erroneous interpretation of the Wild and Scenic Rivers Act. The reason for including rivers in the National Wild and Scenic Rivers System (NWSRS) is to protect them before development occurs – to protect outstanding rivers that are threatened by development. See 16 USC § 1271 (purposes); § 1275 (only if development was undertaken (as opposed to threatened) would river be deemed unsuitable); HR Rep 90-1623 at 3808 ("priority shall be given to studying rivers that are most threatened by developments which, if they materialize, would render the rivers unsuitable for inclusion in the [NWSRS]").	The eligibility study undertaken by the Moab Field Office is described in Appendix J. Remarkably Outstanding Values were identified for each segment of river that was found eligible.
American Rivers	483	4	We are concerned by the process undertaken by the BLM to determine suitability for the Moab area. In the WSRA, the Secretary of the Interior (or where National	The BLM has followed the procedures outlined in the "Wild and Scenic river review in the State of utah, Process and Criteria for Interagency Use" (July 1996), as

			Forest lands are involved the Secretary of Agriculture) "shall study and submit to the President reports on the suitability or nonsuitability for addition to the [NWSRS] of rivers which are designated herein or hereafter by the Congress as potential additions to such system." 16 USC § 1275 (a) (emphasis added). The President "shall report to the Congress his recommendations and proposals with respect to the designation of each river or section thereof under this chapter…In conducting these studies the Secretary of the Interior and the Secretary of the Agriculture shall give priority to those rivers (i) with respect to which there is the greatest likelihood of developments which, if undertaken, would render the rivers unsuitable for inclusion in the [NWSRS]." Id. (emphasis added). In terms of the content Congress stated that each suitability report, including maps and illustrations, shall show, among other things: (1) the area included within the report; (2) the characteristics that do or do not make the area a worthy addition to the NWSRS (i.e., the eligibility criteria); (3) the current status of land ownership and use in the area; (4) the reasonably foreseeable potential uses of the land and water which would be enhanced, foreclosed, or curtailed if the area where included in the NWSRS; (5) the Federal agency administering the area; (6) the extent to which it is proposed that such costs of administration be shared by State and local agencies; (7) the estimated cost to the United States of acquiring necessary lands and interests in land and of administering the area should it be added to the NWSRS; and (8) a determination of the degree to which the State might participate in the preservation and administration of the river should it be proposed for inclusion in the NWSRS. 16 USC § 1275 (a) ; § 1276 (c) (hereinafter "the eight suitability factors").	well as the congressional legislative direction for Wild and Scenic river planning. The BLM recognizes that congressional discretion is up to Congress itself. All streams in the Moab Field Office were given consideration (including riparian areas) for their potential designation as a Wild and Scenic River. Appendix J fully discloses the review and evaluation process for determining which are eligible and suitable for such designation. Designation of any streams and tributaries or drainage areas used as a municipal water source as Wild and Scenic Rivers could result in assertions of minimum water flows, which could affect the water rights and water flows to the communities. The BLM has worked with cooperators to ensure that any effects of decisions regarding Wild and Scenic Rivers are considered. Barring congressional action, there is no effect on water rights or instream flows related to suitability findings made in a land use plan decision. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no effect on existing water rights. Section 13(b) of the Wild and Scenic River Act states that jurisdiction over waters is determined by established principles of law. In Utah, the State has jurisdiction over water. Although the Wild and Scenic Rivers Act implies a Federal reserved water right for designated rivers, it does not require or specify any amount, and instead establishes that only the minimum amount for purposes of the Act can be acquired. Because the State of Utah has jurisdiction over water, the BLM would be required to adjudicate the right, as would any other entity, by application through State processes. Thus, for congressionally designated rivers, the BLM may assert a Federal reserved water right for appurtenant and unappropriated water with a priority date as of the date of

			In the WSRA, Congress explicitly limited the suitability study to the eight factors. See 16 USC § 1275 (a); § 1276 (c). Once the suitability report is completed, and submitted to various officials for review and comment, it is submitted to the President who must then “report to the Congress his recommendations and proposals with respect to the designation of each such river.” 16 USC § 1275 (a). Here the BLM’s application of the suitability standard is arbitrary because 1) it lacks a clear presentation of the decision-making process and ultimate unsuitability determination for the rivers, and 2) it appears to consider factors well beyond the 9 enumerated in the WSRA. The BLM repeatedly contends that the suitability determination is simply an analysis of whether they “should” designate the rivers. By adopting this vague approach the BLM is transforming the straightforward objective suitability standard outline in the WSRA (8 factors to be considered) into an amalgam of subjective criteria. The BLM is standing in Congress’ shoes, seemingly rejecting rivers as unsuitable on purely political grounds. While it is true that factor number 4 of section 4 (a) of the WSRA does open the door to some balancing of competing uses by allowing consideration of “the reasonably foreseeable potential uses of the land and water which would be enhanced, foreclosed, or curtailed” if included in the NWSRS, the BLM is taking it too far. Putting together an objective list of uses that will be enhanced or foreclosed (the good and the bad) does not equate to a river being deemed “unsuitable” because the BLM thinks other uses are more important than river protection or because the river is already “provided protection” by other management prescriptions. Indeed, any interpretation to the contrary would undermine the very purposes of the	designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. In practice, however, Federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values.

			WSRA to preserve the Nation's outstanding rivers under the threat of development and regardless of their location. In fact, the plain language of section 4 (a) of the WSRA., the legislative history, the 1982 43 Guidelines, and express policy goals of the WSRA suggest that some threat of future development does not, and should not, render a river "unsuitable." See 16 USC § 1275 (a)(i) (only those "developments which, if undertaken, would render the rivers unsuitable."); see also HR Rep No 90-1623 at 3808 (seeking to protect rivers that "are the most threatened by developments which, if they materialize, would render the rivers unsuitable"). White it is Congress' prerogative to make purely political decisions – as it has in the past with respect to various rivers (i.e., the Snake in Idaho) – it is not the Federal agencies' prerogative under the WSRA. Moreover, any final suitability decision at this early stage in the NEPA/RMP process is premature. Pursuant to the BLM's own policies, final suitability determinations can only be made after completing the NEPA process and receiving and considering public input on the matter. See BLM Manual 8351 §§ .33 (A), .34 (B), and .42. We strongly urge the BLM to reconsider the suitability findings and issue a revised Draft RMP to address the concerns raised by American Rivers and the Utah Rivers Council.	
Center for Native Ecosystems	485	1	The BLM must disclose why ACEC designation is not necessary for the Cisco Complex under some of the proposed alternatives. Only alternative B, which is not the preferred alternative, would designate the Cisco White-tailed	General information has been added to Appendix I which explains the rationale for designating or not designating ACECs under the preferred alternative. The Cisco Complex ACEC is not designated an ACEC in Alt C because, under Alt C, there are management

			prairie dog complex ACEC. Even when potential ACECs are not recommended for designation in the preferred plan alternative, the rationale for doing so must be included: The rationale for ACEC designations in the preferred alternative must be discussed. The rationale for not proposing designation of a potential ACEC in the preferred alternative must also be provided. In other words, if the proposed plan does not call for special management attention of a potential ACEC in the preferred alternative (and therefore, it is not proposed for designation), the reasons for the decision not to provide special management attention must be clearly set forth. BLM Manual 1613.33.E We were not able to locate such a discussion in the DEIS. The BLM has determined that “the habitat within this area is essential for maintaining this species” (I-10, 3-126), so it is difficult to understand why the agency would not designate this area as an ACEC. FLPMA requires that the BLM give priority to the designation and protection of ACECs, so this is a responsibility that the agency should take seriously	prescriptions that will protect the relevant and important values of the area; therefore, ACEC designation is not required. The BLM will manage habitats within the proposed ACEC boundaries in coordination with UDWR and according to management guidance recommended in any state recommended management plans. • Alternative C makes specific provision for avoiding active colonies that can be implemented on new and existing leases. By surveying areas planned for surface disturbing activities and by avoiding disturbance and destruction of active colonies, ensuring grazing practices that promote seed production and restricting travel to designated roads, the integrity of the relevant and important values of the occupied prairie dog habitats within the proposed ACEC would be preserved. Much of the 177,481 acres of this area is currently not occupied, thus large tracts of land are available for population expansions. Although there may be alteration to some of these unoccupied habitats, the management prescriptions will ensure that once these habitats become occupied, management prescriptions will also protect newly occupied areas in the future. Although the prescriptions listed above are standard operating procedures, by presenting them in the proposed management prescriptions under Alternative C, the BLM has the ability to implement buffers on all leases. Currently prairie dog numbers are low, but if numbers approach those of earlier decades, it may become impossible to develop a lease and adhere to these stipulations. For that reason, exception language was developed to ensure there would not be a taking on a lease holding. Although the buffers are not those recommended by CNE, the BLM worked closely with

				USFWS and UDWR to develop management prescriptions that satisfy both of these agencies.
Center for Native Ecosystems	485	2	Half of the Cisco complex is already leased for oil and gas drilling – the BLM must adopt strict protections on the remaining acreage. Table 4.87 indicates that half of the area within the Cisco White-tailed Prairie Dog ACEC has already been leased for oil and gas drilling. The BLM must act now to conserve the remainder of this area. One of the factors for listing a species under the Endangered Species Act is inadequate regulatory mechanisms. Since valid, existing rights have been granted for half of the Cisco Complex already, the BLM will be hard pressed to demonstrate that it is able to provide adequate management for this species even if it adopts stringent protections via this RMP. Instead, the BLM proposes to apply only a CSY with considerable leeway for exceptions and modifications to the remainder of the habitat that the agency still fully controls. As Table 4.117 indicates, under the preferred alternative 100% of the white-tailed prairie dog habitat in the Moab Field Office would be open to oil and gas leasing. This is unacceptable.	As mentioned in comment 485-1, Alternative C makes specific provision for avoiding active colonies that can be implemented on new leases. Because the buffer is within the parameters of Standard Operating Procedures, the stipulation can be applied to existing leases as well. The Controlled Surface Use stipulation proposed in Alternative C is essentially No Surface Occupancy within 660 feet of an active town. The BLM, in coordinating with USFWS and UDWR determined that the prescription developed in Alternative C will adequately protect active colony integrity. Due to the nature of prairie dog population growth and declines, it was not practical to identify all active colonies and place a No Surface Occupancy stipulation in these specific areas. The BLM, in conjunction with USFWS and UDWR, developed a flexible stipulation that will allow for adaptive management.
Center for Native Ecosystems	485	3	The BLM must disclose how it determined that proposed buffers are adequate, and why different buffers are applied in different situations. The DEIS proposed buffers of differing sizes for prairie dogs, yet we were not able to locate an explanation of how any of these buffers were chosen and why they are believed to be adequate. Alternative B applies a 1300' buffer for white-tailed and Gunnison's prairie dog habitat (C-22, 4-57). Alternative C applies a 660' buffer within white-tailed and Gunnison's prairie dog habitat (2-34, 2-47, 2-48, 4-57,	The buffer was listed wrongly page 2-84 & 4-316 of the DRMP/EIS. The buffer is 660 feet, no 600; these errors have been corrected. In coordinating with the USFWS, a single research report was located that disclosed the distance from disturbance to prairie dogs. This study was conducted on the endangered Utah prairie dog; 1300' was the distance where prairie dogs reacted to events near their colony. As Alternative B presents the most protective management, 1300' was felt to be appropriate, given the lack of documented data on White Tailed or Gunnison's prairie dogs.

			4-394). However, pages 2-84 and 4-316 refer to a 600' buffer for Alternative C. Page 4-395 seems to indicate that under Alternative D, white-tailed prairie dog habitat will be granted a 660' buffer while Gunnison's prairie dog habitat will not be conserved. This is confusing, and could easily be considered arbitrary and capricious. In comparison the Utah BLM uses the following buffers for Utah prairie dogs in the T&E stipulations applied to oil and gas lease parcels in habitat for this species: -Surface occupancy of other surface disturbing activity will be avoided within .5 mil of active prairie dog colonies. -Permanent surface disturbance or facilities will be avoided within .5 mile of potentially suitable, unoccupied prairie dog habitat, identified and mapped by Utah Division of Wildlife Resources since 1976. Half-mile buffers would be 2640', twice what the BLM is proposing even under the more conservative option in the DEIS. In its set of comments to the Utah BLM from May 28, 2004 regarding a proposed oil and gas leasing in white-tailed prairie dog habitat, the US Fish and Wildlife Service stated: We recommend lease notifications identifying the occurrence of white-tailed prairie dog colonies or habitat be added to all the parcels that either contain existing or historic prairie dog habitat. Stipulations should specify a no surface occupancy of at least 500 meters surrounding the prairie dog colonies (page 10) This is equivalent to 1640', again, larger than any of the	Alternative C imposes a buffer that can be implemented on all leases, including active and existing leases, thus allowing the BLM to protect active colonies consistently throughout the entire area. Alternative D presents the least protective management measures. The Moab BLM includes only small portions of the Gunnison prairie dog range. Much of the habitat indentified in Map 2-21 was delineated by soil and vegetative conditions that may have the potential to support active prairie dog colonies which are located on adjacent private and state lands. Currently, active colonies are very limited on public lands and few historical colonies have been identified. Due to the limited potential for Gunnison prairie dog expansion on public lands, it was determined that mitigation measures could be developed on a site specific basis and the development of protective measures was not applicable in the D Alternative. The USFWS has developed specific protective measures to recover the once endangered, but now threatened Utah prairie dog. Of the four species of prairie dogs found the western US, the original range of Utah prairie dogs was less than 500,000 acres. The range of the white-tail prairie dog encompasses almost 50,000,000 acres and the Gunnison prairie dog encompasses over 65,000,000 acres. To recover a listed species that occupies a relatively small range, such as the Utah prairie dog, requires extreme protection measures. Both the White-tailed and Gunnison prairie dog are BLM state sensitive species that require the BLM to manage their habitat in a way that will not lead to listing. However, imposing the same protective measures that have been developed for the Utah prairie dog is overly restrictive to the multiple uses which are mandated for public lands. The Utah prairie dog is a threatened species that occupies less

			proposed buffers in the DEIS. It is important to note that the Service recommended No Surface Occupancy stipulations rather than Controlled Surface Use, as well. In our ACEC nominations we advocated for NSO stipulations for prairie dog complexes plus .5 mile buffers, and we still believe that this is what the BLM should adopt.	than 1% of the range occupied by the White tailed and Gunnison prairie dogs.
Center for Native Ecosystems	485	4	The Cisco Complex is on the short list of sites that have been considered for ferret reintroduction and should be managed as such. When I attended last spring's stakeholder meeting for the Utah Gunnison's Prairie Dog and White-tailed Prairie Dog Conservation Plan, I was surprised that UDWR was still talking about black-footed ferret reintroduction in the Cisco Complex. The BLM should be doing everything it can to facilitate prairie dog recovery in this area so that ferret reintroduction may become a reality. UDWR recently adopted the Northeastern Region Black-Footed Ferret Management Plan, and the BLM should carefully consider its management recommendations. These include: -Place roads and well pads outside prairie dog complexes. -If avoidance is not possible, place roads and well pads close to colony edge or in areas that keep surface disturbances of colonies to a minimum. -After drilling activities cease, reduce well pad size to the smallest possible size (tear-drop shape). -Keep road size width to a minimum. -When roads/well pads are no longer needed, reclaim disturbed areas with suitable seed mix. This will also help control the spread of noxious weeds. -Where possible, bury power lines to reduce raptor perching/hunting sites. -Drill multiple wells from one pad where opportunities	The USFWS has reviewed the management prescriptions and land management decisions developed in Alternative C and the Cisco Desert still remains a viable black footed release site. By policy, the BLM is required to support ESA recovery of species and will continue to coordinate with the USFWS in the ferret recovery program. Though the BLM refers to 'colonies', proximity of colonies in relationship to the size of the disturbance will determine the site specific mitigation. The PRMP/FEIS will provide general management prescriptions that will be tailored to site specific needs.

			exist. (pp. 13-14) It is important to note that UDWR has recommended that disturbances be kept out of complexes as a whole, rather than just outside of individual colonies.	
Center for Native Ecosystems	485	5	The BLM must ensure that it manages white-tailed prairie dogs appropriately – the agency should not rely on UDWR to take care of this. In several places, the DEIS simply states that the BLM will manage white-tailed prairie dogs according to UDWR's plans or recommendations. For example, page 2-45 states, "Manage both prairie dog species and their habitats in coordination with the UDWR. Apply habitat management guidance and population monitoring strategies as recommended in the newly developed multi-agency white-tailed and Gunnison's prairie dog management plan." However, this plan has not yet been completed or adopted. In fact, on of our criticisms of the plan was that rather than reviewing what the BLM actually proposes to do in all of the DEISes out for plans under revision, it only listen options that may appear in the RMP alternatives. Here is the discussion for the white-tailed prairie dogs: The WTPD in Utah is also considered a "State Sensitive Species" by the BLM. The BLM in Utah is currently revising land us plans in Moab, Vernal, Price and Salt Lake Field Offices, covering the entire range of the WTPD in Utah. In the revised land use plans, BLM will recognize the WTPD as a State Sensitive Species, and will address WTPD habitat conservation measures through a range of alternatives. Because the WTPD is considered a State Sensitive Species, the Bureau's 6840 Policy requires that the Bureau "…ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for the species to become	The responsibility of the Utah Division of Wildlife Resources (UDWR) is for the animals themselves. The BLM is entrusted with the management of the habitat that supports animals residing in a given area. As stated in response to comment 485-1, he BLM works in coordination with the UDWR, not only in the development of the DRMP/EIS, but also in the development of conservation plans and management guidance for varying species. The DRMP/EIS is a landscape level management plan that provides the BLM a general framework within which to work. As various plans are developed, the PRMP/FEIS will provide the needed direction and authorization to implement recommendations from other state and federal agencies as applicable. The BLM's Special Status Species Management Manual 6840 Policy functions as an implementation mechanism to adequate conserve sensitive species, including the prairie dog. Manual 6840 directs the BLM to "…ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for the species to become listed." The BLM intends, by the management prescriptions imposed in the DRMP/EIS, to follow state and federal recommendations where applicable.

			listed." Within these new plans, the BLM may propose to manage habitat for WTPDs according to UDWR recommendations, by; developing cooperative agreements with UDWR or other agencies to inventory WTPD habitat, consider suitable unoccupied habitat for population expansion, develop conservation measures to protect active WTPD colonies, mitigate impacts from new roads, oil and gas developments, and rights-of-way, adjust livestock grazing to favor spring plant growth where feasible, limit OHV use to existing roads and trails, and/or propose establishment of Areas of Critical Environmental Concern (ACECs) where WTPD habitat would receive management priority over other resource uses. (p. 20) Most of these measures only appear in Alternative B, not the preferred alternative, in the Moab DEIS. There is a bit of a shell game going on – UDWR tries to reassure the Service in its plan that the BLM will take care of managing prairie dog habitat, and the BLM does the same by pointing to the UDWR plan as the one that will conserve the species. In reality, neither plan does much of anything to change the status quo. The current draft of the UDWR plan also only proposes to implement management changes once a prairie dog species has registered a 40% decline range wide based on occupancy monitoring data. Here is an excerpt from our comments on the draft UDWR plan explaining why this is inappropriate: Finally on page 37 we get to actions, and the plan straight out says "Implement actions … when/if a 40% decline [sic] (95% CI) range-wide occupancy decline is detected from the baseline survey; short-term trigger) [sic] or ongoing as appropriate." This is garbled to begin with, but it seems to state that nothing in Appendix C, or	

			the Assessments, or the Strategies, or the ferret plan will actually be implemented until we see this further 40% range-wide crash in one of the species. This also means that nothing could possibly be implemented until 2011 for white-tailed prairie dogs because this is the first year that such a decline could be registered based on the monitoring strategy. Perhaps the authors would argue that the “as appropriate” allows discretion to implement actions earlier, but the realities of budgets and program priorities will come into play and if you do not actually call for the implementation of actions in this plan, they will not occur. Because the plan ties conservation measures to a 40% decline in occupancy range wide, it is doomed to be ineffective. If prairie dogs disappear from 40% of plots occupied in 2007 or 2008 in a three-year period, it is hard to imagine that the State of Utah would be able to do anything meaningful to bring these species back from the brink. Management in Utah itself also does not really factor into the trigger for conservation actions. For example, if Utah poisons every prairie dog in the state, the 40% decline threshold may still not be met range wide. There still has been no attempt to show that a 40% decline in occupancy range wide would not be catastrophic for these species, and WAFWA and the states are wasting their time in developing these plans that evidentially will do nothing to change the status quo for prairie dogs. This is terribly disappointing, especially because, as the plan notes, conserving prairie dogs offers tremendous hang for the buck – you have the opportunity to bolster populations of many imperiled associated species at the same time. Neither the BLM nor UDWR have shown in the plans	

			that they have drafted that existing regulatory mechanisms are adequate to conserve either the white-tailed or Gunnison's prairie dog. This violates the BLM manual.	
Center for Native Ecosystems	485	6	The DEIS does not provide the type of protections that were promised to the US Fish and Wildlife Service according to their 90-day white-tailed prairie dog petition finding. The language in the current draft of the UDWR plan was tempered from an earlier draft that (over)stated: Within these new plans, the BLM proposes to manage habitat for prairie dogs according to USFWS and UDWR recommendations, develop cooperative agreements with other agencies to inventory prairie dog densities, and provide a suitable habitat for expansion, protect active colonies, and require buffer zones from new road and oil and gas development, and adjust grazing to allow spring plant growth (P. Riddle, BLM, Moab Field Office personal communication). In addition, the BLM restricts off-highway vehicle (OHV) use to designated roads, which benefits WTPDs. (April 5, 2007 draft) The BLM keeps backpedaling on what it will actually do for prairie dogs. The Service's 90-day finding on our Endangered Species Act listing petition reported that neither the Price nor Moab RMPs currently specifically address white-tailed prairie dog protection (69 Fed. Reg. 649899 (Nov. 9, 2004)), but that the revised RMPs will include "protections similar to those for species protected under ESA." Unfortunately, almost all of the protections in the DEIS are only found within Alternative B, which is not the preferred alternative, and these pale in comparison to the protections that listing under the Act would convey.	Both the U.S. Fish and Wildlife Service (USFWS) and Utah Division of Wildlife Resources (UDWR) have reviewed the DRMP/EIS. Neither agency has provided comments as to any deficiencies in Alternative C in relationship to prairie dog habitat management prescriptions. The BLM worked closely with both agencies. Although the BLM did not completely adopt the initial recommendations from either agency (which were not identical), the BLM did use both USFWS and UDWR recommendations, giving consideration to the BLM's multiple use mandate. The BLM developed a set of management prescriptions for the prairie dog, and these prescriptions met the approval of both agencies. In 2004 (after the initiation of the RMP process), the Moab BLM has implemented and funded an agreement with UDWR to inventory all sensitive species (prairie dogs, ferruginous hawks, burrowing owl, kit foxes and bats) within the area encompassed by the ACEC proposal, as well as in wildlife corridors from other important habitats into this area. Upon completion of the DRMP the Moab BLM is planning to develop a Habitat Management Plan in this area to address not only prairie dog habitat management, but all other sensitive species in the area. The Moab BLM recognizes the importance of this area and the potential impacts of energy and recreational development and will use the HMP to future implement any management prescription that may be needed as new information is gather and developed. There is expansive unoccupied prairie dog habitat within the area that will be protected as populations increase. Page 4-316 discusses the requirement for surveys and

			The BLM should be aware that the Service has admitted that the petition findings for both the white-tailed and Gunnison's prairie dogs were illegally tampered with by political appointee Julie MacDonald, and the agency intended to move forward with listing under the Act by completing a status review for each species. Again, the agency has the perfect opportunity to provide adequate management via all of the RMPs that are under revision, but this DEIS does not indicate that the BLM is prepared to do so.	buffer zones that have been developed for the White tailed and Gunnison prairie dogs. Although these buffers are not as large as recommended for the Utah prairie dog (a threatened species), they are sufficient to facilitate colony protection. Grazing practices that will support spring plant growth and seed development, and travel management that will restrict travel to designated roads are also discussed in this section. Two of the biggest threats to prairie dog populations are Bubonic plague and drought. The BLM cannot develop land management prescriptions that will offset the declines that plague and drought can cause. As long as plague remains a threat, prairie dog populations will remain very cyclic.
Center for Native Ecosystems	485	7	The BLM must analyze impacts to all Special Status Species. The DEIS states, "It was determined that quantitative analyses would be made for Federally listed species as well as a few BLM sensitive species selected as representative of a variety of vegetation types." (p. 4-354) However, the BLM has considerable direction to address Special Status Species management during plan revision. For example: -For priority plan species and habitats, "identify the actions and area wide use restrictions needed to achieve desired vegetative conditions." BLM Land Use Planning Handbook H-1601-1, Appendix C at 3. -For priority populations, species, or habitats of fish and wildlife, "identify actions and area wide use restrictions needed to achieve desired population and habitat conditions while maintaining a thriving natural ecological balance and multiple-use relationships." BLM Land Use Planning Handbook H-1601-1, Appendix C at 7. -Also, BLM must "identify site-specific actions, such as riparian fencing, guzzler placement, etc. needed to	The BLM has analyzed impacts to Special Status Species in Chapter 4 where impacts are expected. Each of the special status species was aggregated by habitat type for purposes of analysis. Actions to achieve desired vegetation conditions have been developed in the alternatives. Actions and restrictions for priority fish and wildlife species have been developed in the alternatives. See Chapter 2 and Appendix C for these restrictions. The BLM has not determined the need for site specific management needs for prairie dog habitats, but rather has developed prescriptions that will offer protection throughout large tracts of habitat. Site specific habitat improvements will be developed subsequent to the PRMP/FEIS and will be analyzed, using the NEPA process, on a case-by-case basis. Strategies and decisions to conserve and recover special status species have been developed in the alternatives. Conservation Strategies for special status species are

			manage ecosystems for all species and habitat for special status species." BLM Land Use Planning Handbook H-1601-1, Appendix C at 7. Additionally BLM must: Identify strategies and decisions to conserve and recover special status species. Given the legal mandate to conserve threatened or endangered species and BLM's policy to conserve all special status species, land use planning strategies and decision should result in a reasonable conservation strategy for these species. Land use plan decisions should be clear and sufficiently detailed to enhance habitat or prevent avoidable loss of habitat pending the development and implementation of implementation-level plans. This may include identifying stipulations or criteria that would be applied to implementation actions. Land use plan decision should be consistent with BLM's mandate to recover approved recovery plans, conservation agreements and strategies, MOUs, and applicable biological opinions for threatened and endangered species. BLM Land Use Planning Handbook H-1601-1, Appendix C at 5. Although neither the BLM manual nor the land use planning handbook appear to explicitly require the development of Conservation Strategies, such a responsibility is clearly inferred. The BLM Manual's definition of a "Conservation Strategy" further underscores this understanding: A strategy outlining current activities or threats that are contributing to the decline of a species, along with the actions or strategies needed to reverse or eliminate such a decline or threat. Conservation strategies are generally developed for species of plans and animals that are designated as BLM Sensitive Species or that	developed on a state wide basis, in cooperation with the U.S. Fish and Wildlife Service (USFWS), the Utah Division of Wildlife Resources (UDWR) and the surface-managing agencies that manage the habitat for the species. Once these Conservation Strategies are developed, the BLM's field offices are mandated to implement these strategies. Until such time as Conservation Strategies are developed, the BLM will defer to the prescriptions that have been developed in the DRMP/EIS. The BLM will also continue to coordinate with UDWR and USFWS on all actions, as applicable.

			have been determined by the Fish and Wildlife Service or National Marine Fisheries Service to be Federal Candidates under the Endangered Species Act. BLM Manual § 1601, Glossary at 2. Instead, the BLM seems to have chosen the species that it feels are receiving the most scrutiny these days and included them in the DEIS while basically ignoring the other Special Status Species in the Field Office.	
Center for Native Ecosystems	485	8	The DEIS does offer some hope. Alternative B would go a long way to conserving prairie dogs – the BLM even appears to be considering a year-round shooting closure in the Cisco. And even Alternative D would require 660' buffers around active colonies. But all of the stipulations are much too weak now because of the broad exceptions and modifications that can be applied. The BLM should step back and consider how this RMP could foster recovery of the white-tailed prairie dog, Gunnison's prairie dog, black-footed ferret, ferruginous hawk, and burrowing owl – the entire prairie dog ecosystem – and then provide a more comprehensive conservation strategy in the FEIS.	The Moab BLM, in coordination with the Utah Division of Wildlife Resources and the U.S. Fish and Wildlife Service, plans to develop a Habitat Management Plan in the Cisco area to address not only prairie dog habitat management, but the management of all other sensitive species in the area.
NOLS/ Outdoor Industry Association	487	1	NOLS is compelled to participate in many of them [FO plans], including the Price Supplemental Environmental Impact Statement (EIS) due on December 13, the Vernal Supplemental EIS due on January 3, the Richfield Draft EIS due on January 23, and the Monticello Draft EIS due on February 8. Having so many comment periods open within the same limited time frame will have a negative effect on the quality of comments returned.	See response to comment 124-1.
NOLS/ Outdoor Industry Association	487	2	Permanent protection of the Green river corridor is both urgent and appropriate. Floating through the arid desert ecosystem between the breathtaking 5,000 foot walls of Desolation Canyon, out Gray Canyon, and through Labyrinth Canyon, our students gain invaluable insight	The Green River in its entirety is proposed to be managed as no surface occupancy for oil and gas and all other surface disturbing activities in the preferred alternative. The entire river (except for the portion between Swasey's Rapid and the San Rafael River confluence) is suitable for

			into the diverse biology, geology, and cultural history of the American West against the backdrop of a historic and free-flowing wild river. For several years NOLS and other concerned outfitters have been protesting potential oil and gas leases that threaten to encroach on scenic vistas and wildlife habitat, and diminish the river experience of our customers and students. Preserving the wild character of the Green is critical not only to the health of outdoor education programs and outfitting businesses, but also to the long-term viability of river-related businesses in the area. Economically speaking, the Green river is an asset for surrounding communities. NOLS alone teaches more than 20 courses per year, averaging over 2,400 user-days. A Wild and Scenic designation would preserve the outstanding and remarkable values of this free-flowing river and bolster the regional recreation and tourism economies. Given the overwhelming evidence qualifying the Green River as suitable, and given our school's desire to continue to operate courses in an ecologically, geologically, and cultural diverse landscape, we strongly support designating the Green a Wild and Scenic River in its entirety. NOLS and OIA are comfortable with the Wild, Scenic, and Recreational designations for which the entirety of the river is found eligible in Alternative B, and ask the MFO to retain these designations in its suitability that will accompany the Final EIS.	Wild and Scenic river designation. (The portion mentioned has a preponderance of private and state land along the shore).
NOLS/ Outdoor Industry Association	487	3	According to Map 2-24-B, entitled Areas with Wilderness Characteristics – Alternative B, a piece of Gray Canyon beyond the Desolation Canyon WSA, across from Gunnison Butte along the Book Cliffs, retains the wilderness qualities. Likewise, areas with wilderness characteristics border much of the Green River along Labyrinth Canyon. Only in Alternative B do these wilderness-quality areas receive Visual Resource	The Green river corridor is to be managed as no surface occupancy in the preferred alternative. This means that new surface disturbing activities would not be allowed. Given this oil and gas management, VRM II is deemed to be sufficient to protect visual resources along the Green River.

			Management (VRM) Class I viewshed status, and even then it is only along the edge of the Labyrinth Canyon Rim. Everywhere else is Class II or Class III. In section 4.3.18 of the Moab DEIS, VRM Class II allows that, “Management activities may be seen, but should not attract the attention of the casual observer. Any changes to the landscape must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape” (p. 4-433). NOLS and OIA feel that VRM Class II inadequately protects the canyon viewshed. VRM Class I “does not preclude very limited management activities,” and specifies that, “the level of change to the characteristic landscape should be very low and should not attract attention” (p.4-432). Such a designation is more appropriate for a river viewshed with wilderness-quality characteristics. NOLS recommends that the Final RMP prescribe a VRM Class I viewshed for all areas along the Green River that have been shown to have wilderness characteristics in Alternative B in the Draft RMP, in both Gray and Labyrinth Canyons.	
NOLS/ Outdoor Industry Association	487	4	While in principal NOLS and OIA support the Moab Field Office’s (MFO) efforts to inventory and identify all designated routes rather than opening up wide swaths of land to motorized recreation, in practice this initiative raises a few concerns. Unofficial, user-created routes that have previously not been recognized will enjoy administrative protection if they are included in the final RMP. It will be much harder to close routes the MFO deems to be detrimental to other multiple uses if they are incorporated into the plan. In fact, it would require a plan amendment. This limits the BLM’s ability to manage routes in a timely manner. In particular, there are two designated routes along the	The two roads that the commentor refers to were both built during the uranium mining days of the 1950's and 1960's. These two roads are not new, nor are they user created. While they are to be included in the travel plan that accompanies the preferred alternative, their removal would not require a plan amendment, but rather a simple EA. The intent of the travel plan is to restrict travel to designated routes, not to open up new swaths of lands to motorized recreation. Routes above the Green River rim do not generally cause conflicts with users below, as the distances are quite great.

			Green River in Labyrinth Canyon that represent a clear conflict of uses. Most disconcerting is a route at Hey Joe that actually follows the canyon bottom and is accessible by jeep. OHV activity along the canyon bottom clearly conflicts with a primitive river experience. Further downriver, at Spring Canyon, a similar route extends too far north in both Alternatives B and C. Route development along the Labyrinth Canyon floor should be discouraged, not legitimized. The MFO is likely aware of the Horseshoe Canyon Wilderness Study Area within the Price Field Office that extends to the west bank of the river, immediately across from the route along Hey Joe. NOLS and OIA consider that having one bank of a river managed to retain its wilderness character while the other bank remains open to motorized jeep travel to be a flawed prescription. Ideally, the MFO will create a larger buffer zone along the canyon rim, with the exception of a few limited access points, to better protect the visual resources, the air quality, the opportunities for solitude, and the primitive experience frequently associated with river trips. The Final RMP should provide at least a ¼ mile buffer from the canyon rim, unless the viewshed from the river extends beyond ¼ mile, in which case the buffer zone should be extended as well. A few limited access points can be maintained, but not at the excessive levels currently being considered.	
NOLS/ Outdoor Industry Association	487	5	Ideally, a preferred alternative demonstrates a balance between issues in the conservation alternative and the development alternative. In many cases it seems that the MFO worked hard to find a good balance between various needs. When considering wilderness characteristics, however, the preferred alternative seems less balanced. Alternative B identifies 266,485 acres that have wilderness characteristics, and proposes managing these acres in a fashion that would	While only 47,000 of the 266,000 acres of lands with wilderness characteristics are to be managed to protect these characteristics in the preferred alternative, over 40% of such lands are managed as no surface occupancy fo roil and gas development and other surface disturbing actitivies. This management prescription will preclude development. It should be noted that the entire Green River corridor is to be managed in this manner.

			maintain those wilderness characteristics. Alternative D opts to manage zero acres for wilderness characteristics outside of WSAs. Alternative C, which should provide a balance between B and D, purports to manage only 47,761 acres to maintain wilderness characteristics, less than 1/5 of potential acreage. Managing for wilderness characteristics does not preclude motorized travel. It merely confines motorized travel to designated routes. According to the Moab DEIS Table 2.1, on Non-WSA Lands with Wilderness Characteristics, the BLM purports to, “Manage these primitive lands and backcountry landscapes for their undeveloped character, and to provide opportunities for primitive recreational activities and experiences of solitude, as appropriate” (p. 2-16). A better balance can be found, and lands near Desolation Canyon and Labyrinth Canyon provide an excellent opportunity to find that balance. According to Table P1 (P-3) in the Moab DEIS, Non-WSA Lands with Wilderness Characteristics in Desolation Canyon and Labyrinth Canyon would add 35,330 acres to wilderness characteristics currently being considered in Alternative C. This would almost double the land being managed to preserve wilderness characteristics. Additionally, such an addition in the Final RMP would do much to protect the river corridor, which deserves protection until Congress has an opportunity to weight the merit of designating stretches of the Green River as Wild, Scenic, or Recreational.	All lands in the Moab field Office, with the exception of around 2,000 acres near the White Wash Sand Dunes, are to be managed as limited to designated routes. This is intended to stop the cross country travel that currently occurs.
Coconino Trail Riders	488	1	The DRMP departs from the "Multiple Use/Sustained Yield" mandate imposed on the BLM by Congress and the Congressional time limit for Wilderness inventory has passed. The designation of quasi-wilderness areas through this planning process is inappropriate and unlawful.	See responses to comments 121-10, 120-8 and 121-63.

Coconino Trail Riders	488	2	The DRMP does not offer a true motorized alternative. ALL alternatives represent a major reduction in motorized use. The "motorized" Alternative D provides somewhat more miles of trail and gives motorized users somewhat more open area in White Wash and some other areas. These small increases in motorized use over the Preferred Alternative C do not nearly make up for the designation of all of Rabbit Valley /Westwater as non-motorized. A true motorized alternative is necessary.	See response to 208-2.
Coconino Trail Riders	488	3	Any trails planning must provide for motorized single track and motorcycle slickrock routes. Please incorporate the existing routes as suggested by Ride With Respect and the Blue Ribbon Coalition and please provide for future planning and implementation of such trails.	The DRMP/EIS provides 282 miles of singletrack motorcycle route in the preferred alternative. See response to the Blue Ribbon Coalition (ID 123) and Ride with Respect (ID 122) comments for specific suggestions from these groups.
Coconino Trail Riders	488	4	We support the 200 yard motorcycle corridor and open area status for mountain bikes proposed by Ride With Respect and the Blue Ribbon Coalition on the Slickrock Trail. This is a good compromise between providing for exploration for motorcyclists while still providing an escape from motor noise for mountain bikers and hikers on the Slickrock Trail	See response to comment 122-42.
Coconino Trail Riders	488	5	The White Wash Dunes Fee Area is ill-advised and unworkable. From an Agency perspective, it would appear to be exceedingly difficult to administer and enforce. From an user perspective, it appears arbitrary and capricious with regards to limits and usefulness. It is also difficult to comply: where can a user conveniently purchase permits? While the CTR is not necessarily opposed to the fee concept, users need to be intimately involved in creation of thee areas, with appropriate oversight of how collected monies are spent. Funds need to be allocated to work on the ground, and not siphoned off for administrative and overhead fees, or be transferred to other districts.	See response to comment 123-10.
Coconino Trail	488	6	Dispersed camping is important to CTR members. It is	See responses to comments 120-86 and 123-8.

Riders			an important part of the off-road recreational experience. With this in mind, it appears that dispersed camping is to be essentially eliminated, although the camping proposals relative to the various Alternates are unclear. The final plan must mandate full public involvement in the establishment of restricted or controlled camping areas.	
Coconino Trail Riders	488	7	Important motorcycle trails are missing from all alternatives. The preferred alternative includes about 100 miles of true motorized single-track. Alternative D adds another 100 miles. Instead, the final plan should - at a minimum—keep roughly 300 miles of non-road motorcycle routes from being closed.	The BLM asked the public to submit routes during the scoping period, including singletrack motorcycle routes. The BLM analyzed all routes that were verified by BLM personnel. See response to comments 122-15 and 122-30 for a discussion of the addition of new routes to the Travel Plan.
Coconino Trail Riders	488	8	Travel Plan Alternative D falls short of providing sufficient motorcycling opportunities. Since no single-track inventory was performed, the BLM should continue accepting data on existing routes and consider them for implementation.	See responses to comments 122-15, 122-30 and 488-7.
Coconino Trail Riders	488	9	The Utah Rims single-track network should include at least 25 miles of additional routes, in order to be as complete as the Dee Pass network.	See responses to comments 122-15 and 122-30. The Utah Rims motorcycle routes were inventoried by the BLM and user group representatives in Colorado prior to the initiation of the RMP revision. On January 22, 2001, the Utah Rims area was limited to existing routes, which meant the existing inventory undertaken by the BLM.
Coconino Trail Riders	488	10	Long-distance single-tracks and rugged roads that connect 7 SRMAs offer a unique experience. The Copper Ridge Motorcycle Loop should be combined with Thompson Trail in the final plan.	See responses to comments 122-29 and 122-36.
Coconino Trail Riders	488	11	A few more non-riparian washes should be left open, especially Cisco Desert. Wash riding is very popular. These travel-ways provide ATV and motorcycle riders an unconfined challenge that roads cannot.	See response to comment 122-14.
National Trust for Historic	489	1	The Draft RMP fails to explain how BLM intends to evaluate 2,642 miles of OHV routes in accordance with	Washington Office Instruction Memorandum 2007-30, "Clarification of Cultural Resource Considerations for Off-

Preservation			the Section 106 process. Section 106 requires BLM to comply with several discrete requirements before approving a final action. See 16 U.S.C. § 470f; 36 C.F.R. §800.1(c). However, the Draft RMP provides virtually no explanation of when and how BLM will comply with each of these requirements before implementing the route designations proposed in the travel plan. For example, although BLM may "adjust" the proposed OHV route designations "through a collaborative process with local government," Draft RMP at 2-48, the Draft RMP does not discuss how and to what extent BLM will consult with Indian tribes prior to finalizing the route designations. See 16 U.S.C. § 470a(6)(b) (requiring tribal consultation). (FOOTNOTE: BLM did meet with twelve tribal organizations during the scoping process for the Draft RMP. Draft RMP at 5-3. Additionally, BLM held meetings with five more tribal organizations to discuss the Draft RMP alternatives. Id. However, the Draft RMP does not disclose whether BLM consulted with these or additional tribal organizations regarding the travel plan and, specifically, the proposed route designations.) Nor does the Draft RMP address how BLM will identify and address the indirect effects of designating OHV routes on cultural resources, including the effects of vandalism caused by the proximity of designated routes to cultural sites. See id. § 800.5(a)(1) (requiring an evaluation of indirect effects. As discussed above, these Section 106 requirements will require a significant commitment from BLM and thus warrant greater consideration in the Moab RMP.	Highway (OHV) Designation and Travel Management", details how the BLM complies with Section 106 of the National Historic Preservation Act for designation and management of areas, roads and trails. This IM states that proposed designations that will not change or will reduce OHV use are unlikely to adversely affect historic properties and will require less intensive identification efforts. The Moab RMP proposes to close over 2,500 miles of existing route. This constitutes a reduction of OHV use and thus enhances historic properties. The BLM has consulted with Native American tribes throughout the planning process. See Chapter 5 for a detailing of these consultation efforts. The Travel Plan was included as part of this consultation. Archeological vandalism is illegal. The RMP does not analyze illegal activity.
National Trust for Historic Preservation	489	2	The Draft RMP may exempt hundreds, if not thousands, of route miles from the requirements of Section 106 by labeling them "existing" routes. (FOOTNOTE: BLM currently interprets the Section 106 regulations to require a Class III inventory prior to the designation of new routes as well as prior to the designation of certain	A sentence has been added on pg. 2-7 of the DRMP/EIS defining "new route": New routes are defined as those not designated in the Travel Plan accompanying this RMP".

			existing routes for continued use. IM No. 2007-030. Thus, to the extent BLM does not perform Class III inventories of "new" routes because it labels them "existing," it would contravene this interpretation.) Under the preferred alternative, BLM would not perform Class III inventories prior to designating an "existing" OHV route for continued use. Draft RMP at 2-7. This management prescription comes from a BLM Instruction Memorandum (1M) issued in December 2006, which generally requires Class III inventories for the designation of "new" routes but not for the designation of continued use on "existing" routes. IM No. 2007-030. However, neither the DRMP nor the IM define the term "existing route." Thus, an "existing" route may mean a route previously .designated for OHV use by BLM. See Draft RMP at App. G-4 (identifying areas limited to "designated" and "existing" routes under the current RMP). But it may also reasonably be interpreted to mean a route that is physically present on the ground. Both interpretations would frustrate Section 106 compliance. The former because a route previously designated through the land use planning process does not necessarily mean that a Section 106 review occurred in association with the designation. In fact, the Draft RMP is silent as to whether BLM complied with Section 106 for existing route designations in the Moab Field Office. See Draft RMP at 3-83 (discussing route designations under current RMP). The latter interpretation would also prevent BLM from fulfilling the requirements of the Section 106 process because each route proposed for designation under the preferred alternative currently exists on the ground. See Draft RMP at App. G-5. Thus, the "existing" route exception would effectively swallow the whole, and could entirely exempt all routes within the Moab Field Office from the requirements of Section 106, including those routes created by users through time and without regard for	

			their direct and indirect effects on cultural resources. See, e.g., id at 3-79 (describing a "network" of user-created routes in the White Wash Dunes area). For the foregoing reasons, BLM must define the term "existing" route to mean only those routes previously designated through the land use planning process and for which BLM completed the Section 106 process.	
National Trust for Historic Preservation	489	3	We recommend that BLM develop a comprehensive strategy for complying with Section 106 prior to designating OHV routes, provide the public with an opportunity to review and comment on the strategy, and consider the following recommendations during the development of this strategy. These recommendations are not intended to represent an exhaustive list of what we believe Section 106 requires for this undertaking. Rather, we provide them here to highlight specific aspects of the Section 106 process that we feel are particularly important in this context: 1. Consult with Indian tribes. BLM must consult with Indian tribes that attach religious or cultural significance to historic properties in areas potentially affected by the proposed OHV designations. Additionally, BLM should revise the Travel Plan to reflect the findings of the ethnographic study referenced in the Draft RMP. Draft RMP at 3-16. 2. Define the areas of potential effect for the proposed routes broadly and in such away that fully captures--their indirect and cumulative effects on cultural resources. 3. Identify cultural resources within the areas of potential effect in accordance with IM 2007-030. As discussed above, BLM should only exempt routes that have previously undergone Section 106 review from the IM's requirement for a Class III inventory. 4. Evaluate the direct, indirect, and cumulative adverse effects of the proposed routes. The Section 106 regulations require BLM to identify and resolve the	The BLM will adhere to its Section 106 responsibilities as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the APE and compliance with section 106 prior to designation. Class III inventory of the APE and compliance with section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by Class III

			direct, indirect, and cumulative adverse effects of the proposed OHV designations on cultural resources. 36 C.F.R. § 800.5(a)(1). As part of this analysis, BLM must consider the possibility that OHV route designations will provide greater access to cultural sites and thus increase the likelihood of vandalism, looting, and the inadvertent destruction of cultural sites. See Jerry D. Spangler et al., Chasing Ghosts: An Analysis of Vandalism and Site Degradation in Range Creek Canyon, Utah 21 (2006) (finding a dramatically higher frequency of vandalized cultural sites within 200 meters of a section of the Range Creek Canyon road open to motorized use). 5. Develop a programmatic agreement in consultation with the Advisory Council on Historic Preservation, Indian tribes, Utah State Historic Preservation Office, and other interested parties. The Section 106 regulations allow federal agencies to develop a programmatic agreement (PA) "to govern the....resolution of adverse effects from certain complex project situations or multiple undertakings" in consultation with the Advisory Council. 36 C.F.R. § 800.14(b). The designation of OHV routes in the Moab Field Office clearly meets both of these criteria. A PA would allow BLM, in consultation with the Advisory Council, Utah SHPO, and other interested parties, to develop alternative methods for complying with the Section 106 requirements prior to implementing the OHV routes. .	inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available. The BLM has consulted with Native American tribes concerning all decisions in the PRMP/FEIS, including the Travel Plan accompanying this RMP. The BLM has consulted with the Utah SHPO regarding all decisions in the PRMP/FEIS, including the Travel Plan accompanying this RMP. The Area of Potential Effect for any project is determined in consultation with the appropriate SHPO/THPO in accordance with 36 CFR 800.4(a)(1). This will occur upon initiation of the Section 106 consultation process for this RMP. Each route designated in the Travel Plan was examined individually by a professional BLM archaeologist (see Appendix G for a description of the Travel Plan process). Those routes that posed cultural conflicts that outweighed the purpose and need for the route were not designated. The archaeologist looked at each of 33,000 road segments in the Moab planning area. The Draft RMP/EIS acknowledges that the illegal activities, such as vandalism and looting, may be impacted by changes in access, as is specifically identified in section 4.3.5. The Draft RMP/EIS does not include a detailed analysis of illegal activities. Enforcing the RMP decisions is an implementation-level action. Concerning the impacts from OHV leaving routes that are identified in an alternative, the Draft RMP/EIS analyzes the effects of the proposed actions, which does not include public land users driving off identified routes in areas that where OHV use is limited to identified routes.

				Programmatic agreements are administrative actions and do not require a planning decision.
Public Lands Advocacy	491	1	BLM's Instruction Memorandum 92-67 clarifies how valid existing rights are to be honored. It is legally required that valid Existing Rights be honored. Therefore, not only must their acknowledgement be incorporated into the section that outlines Management Common to All Alternatives, but also throughout the entire EIS and the resulting resource management plan. Of additional concern is that BLM has failed to analyze the impacts each alternative will have on existing leases and lessees, particularly given that many of the leases are isolated in remote areas and that under Alternatives B, C, and D, BLM has proposed sizeable withdrawals and no surface occupancy designations. Nowhere has BLM disclosed the impacts these restrictions will have on existing leases and future development of energy resources on these leases. We recommend that the final EIS fully address this omission.	See response to comment 214-4.
Public Lands Advocacy	491	2	BLM has ignored the direction contained in Instruction Memorandum (IM) 2003-137, Integration of the Energy Policy and Conservation Act (EPCA) Inventory Results into the Land Use Planning Process, to balance environmentally responsible energy development with sensitive resources. According to this IM, the MFO is also required to review all current oil and gas lease stipulations to make sure their intent is clearly stated and that stipulations utilized are the least restrictive necessary to accomplish the desired protection. Moreover, the IM directs that stipulations not necessary to accomplish the desired resource protection be modified or dropped using the planning process. Nowhere in the DEIS has BLM demonstrated that it met the requirements of EPCA in the Moab land use planning process, i.e., ensuring that access and	See response to comment 214-9.

			availability of the public land for energy resources are not unduly restricted. In addition, BLM has ignored the findings of EPCA phase II. This report supersedes Phase I of the inventory. It evaluates the Paradox/San Juan Basins and analyzes the additional impact of drilling permit conditions of approval, as required by Section 364 of the Energy Policy Act of 2005. The EPCA II report found this area has more land subject to no leasing than all other EPCA study areas, 57%, more than 10 million acres. Added to that is the 1.6 million acres subject to no surface occupancy stipulations. Specifically, 66% of the Paradox/San Juan Basin is already unavailable for leasing or development. It is of grave concern that 20 percent of all existing federal natural gas reserves and 48 percent of the proven federal oil reserves are off limits to exploration and development. The fact that the DEIS proposed in Alternative C to set aside even more lands is contrary to the direction contained in EPCA II and the National Energy Policy as established in EO no. 13211. We urge BLM to reconsider its selection of Alternative C as the preferred management alternative.	
Public Lands Advocacy	491	3	We object to the fact that the analyses and discussions contained in this Draft RMP do not take into account routinely applied mitigation measures. The manner in which environmental consequences is presented is tantamount to a worst case scenario. Section 1502 of the Council on Environmental Quality Regulations on the National Environmental Policy Act directs that mitigation measures be identified in the EIS which may be employed to reduce or entirely avoid impacts to other resource values. While this direction has apparently been construed to mean that only lease stipulations and other mitigation measures need be identified somewhere in the document, it is necessary	The analysis assumptions for oil and gas development on pg. 4-4 of the DRMP/EIS is based on surface disturbance associated with projected well numbers. This level of impact analysis is appropriate for land use planning. This is not a worst case scenario but provides a comparison of the impacts across the alternatives. This comparison of impacts for the alternatives is provided on Table 4.2. More detailed analysis of impacts and mitigation are considered for site specific proposals after completion of the land use plan.

			to address all mitigation measures utilized during oil and gas exploration and development activities by incorporating them into the environmental consequences analysis. The Draft RMP does not address any type of mitigation until after it has described the worst case scenario. This does nothing more than fuel the flames of opposition to oil and gas activities. It is crucial for mitigation measures to be acknowledged in the effects analysis to show that oil and gas activities are mitigated and are actually compatible with other resources uses, including those in sensitive areas. Therefore, it is crucial for this chapter be revised to incorporate mitigation measures in the cumulative effects and environmental consequences analyses.	
Public Lands Advocacy	491	4	CXs are an important tool used in BLM's administration of the federal oil and gas program. They are designed to facilitate the permit approval process by lessening needless paperwork and timeframes associated with these approvals. We recommend that the Final EIS fully examine and disclose the conditions under which they will be used. Additionally, the DEIS fails to acknowledge that BLM has adopted a CX for geophysical exploration which eliminates the need for an environmental assessment or environmental impact statement when no roads are involved. This new CX must be incorporated into the record of decision for the Moab RMP.	See response to comment 214-5.
Public Lands Advocacy	491	5	Offsite Mitigation – Under management Common to All Alternatives in Chapter 2, BLM indicates it will seek to "Fully mitigate all unavoidable habitat losses for special status species at a minimum 1:1 ratio." Comment and Recommendation: While we recognize that many companies have offered to perform off-site mitigation, several concerns must be raised. According	Chapter 2 of the PRMP/FEIS has been changed. The statement has been changed to "Mitigate all unavoidable habitat losses for special status species at a minimum 1:1 ratio, where required by policy or law".

			to Instruction Memorandum 2005-69, compensation or off-site mitigation must be entirely voluntary on the part of the applicant. While BLM may identify offsite mitigation opportunities, it stated they will not be carried forward unless volunteered by the applicant. We oppose any program that would impose off-site or compensation mitigation as a BLM requirement.	That the BLM would recommend a reclamation ratio of 1:1. The word fully has been removed.
Public Lands Advocacy	491	6	Comment and Recommendation: The removal of these lands from availability for leasing constitutes a withdrawal. In accordance with FMPLA, only the Secretary of the Interior is authorized to make a withdrawal of lands as described above. The Secretary is also required to provide notice of a proposed withdrawal in the Federal Register, to conduct public hearings on the proposal and to notify Congress of the proposal. Clearly, such a “withdrawal” cannot be made through the resource management planning process. Therefore, it is necessary for the MFO to either revise its Draft RMP or follow the procedures for withdrawal outlined in FLPMA.	See response to comment 214-7.
Public Lands Advocacy	491	7	Comment and Recommendation: The restrictive management proposed in both Alternatives B and C, however, fail to comply with the FLPMA, which required public lands to be managed in a manner which recognizes the Nation’s need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining and Minerals Policy Act of 1970 (84 Stat. 1876, 30 USC 21a). In addition, the Mining and Minerals Policy Act directs the federal government to “foster and encourage private enterprise” to develop minerals “to help assure satisfaction of industrial, security, and environmental needs.” Clearly BLM has ignored these directives just as it has ignored the EPCA Phase II Study, not to mention the energy policy outlined in EO no. 13211. Because this EO directly affects BLM energy decisions and policies in Utah, a discussion of this EO is	See response to comment 210-2.

			warranted in conjunction with the Preferred Alternative's effects on energy exploration, development, and production. In addition, the excessively restrictive nature of the Preferred Alternative, as well as alternatives B and D, does not allow BLM the management flexibility needed to wisely manage the federal oil and gas program. Therefore, it is essential for BLM to revise its approach by adopting Alternative D which more closely comports with the agency's multiple use mission, complies with current energy status and policies, and recognizes BLM's authority to manage oil and gas development without restoring to broadly applied restrictions designed to thwart reasonable recovery of energy resources. It is illogical to assume that when technological improvements are made, the agency can conduct new environmental analyses. Such an approach is needlessly costly and time consuming and will most likely be done at industry's expense.	
Public Lands Advocacy	491	8	PLA is concerned that the Reasonable Foreseeable Development Scenario does not take into account all relevant factors. While historical uses are indeed part of the mix of factors that should be considered, it is also important to consider the most up-to-date geological information for the area and the technological advances made by the industry. The EPCA II Report found that the Paradox/San Juan Basin has high value for energy resources in that it contains 464 MMbbls of oil and 38,119 BCF of natural gas. As a result, in addition to past permitted activities, BLM must also factor in future interest in development in the area based upon this potential and taking into account improved drilling and reclamation practices. In our assessment, even if BLM were to base its projections strictly on recently permitted activities, a minimum projection should be at least 975 wells. Clearly it is necessary for BLM to	See response to comment 203-15. The EPCA Report was utilized in developing the Mineral Report and the Reasonably Foreseeable Development Report.

			reevaluate its assumptions by utilizing the most up-to-date information to ensure the efficacy of the plan is not diminished by out-dated information.	
Public Lands Advocacy	491	9	We can find no legal basis for BLM to preserve purported wilderness values on lands not designated as wilderness or wilderness study areas. BLM completed its Wilderness Study Process under Section 603 of FLPMA when it forwarded its recommendations to the President in 1991 and eliminated the lands in question from further wilderness consideration. To date, no provisions exist for BLM to further evaluate or preserve lands for their wilderness characteristics. In fact, new wilderness inventories are prevented under the settlement in State of Utah v. Norton, 2006. It is now up to Congress to make the final decision on which land should be protected to preserve their wilderness character. We recommend that BLM discard this proposed management in favor of multiple use management.	See response to comment 214-2.
Public Lands Advocacy	491	10	Avoidance / Exclusion Areas for Rights-of-Way – The DEIS indicates “Right-of-way (ROW) avoidance and exclusion areas would be consistent with the stipulations identified in Appendix C for oil and gas leasing and other surface disturbing activities. These stipulations have been developed to protect important resources values.” Right-of-way exclusion and avoidance areas have been created under each of the management alternatives. Comment and Recommendation: While the DEIS appears to indicate these exclusion and avoidance areas coincide with lands subject to NSO or no leasing, no specific analysis or justification is provided. In addition to providing maps for each alternative that illustrate where these areas are located, detailed discussion that provides a rationale by alternative for these decisions is required. Without such information, it	See response to comments 214-12 and 203-22.

			is impossible to analyze the impacts these exclusions will have on energy and mineral activities as well as other multiple use activities. It would appear these decisions have been made in a vacuum without consideration of other land uses, including future oil and gas exploration and development activities. Neither does BLM appear to have considered the effects these de facto withdrawals will have upon valid existing rights of lessees who require adequate access for pipelines, flow-lines, and other transportation needs. This is a fundamental flaw in the analysis that must be remedied.	
Public Lands Advocacy	491	11	Old Spanish Trail – Chapter 2 of the DEIS identifies various management options for the Old Spanish Trail including preparation of the "forthcoming Old Spanish Trail Comprehensive Management Plan." Comment and Recommendation: BLM has failed to provide a map depicting the actual location of the Old Spanish Trail making it impossible to determine effects on multiple use activities. Moreover, no analysis is provided that addresses the impacts the various management options will have on oil and gas activities in the area. We recommend that a map and comprehensive analysis be included in the FEIS.	See response to comment 214-22.
Public Lands Advocacy	491	12	Sage Grouse – BLM proposes to mitigate sagebrush habitat loss using a 2:1 ratio under Alternative B, and a 1:1 ratio under Alternative C in Greater and Gunnison Sage-Grouse habitats. Comment and Recommendation: BLM's proposed management of Greater Sage-Grouse and the Gunnison Sage-Grouse is unjustifiable restrictive under both Alternatives B and C. The fish and Wildlife Service found in 2005 that the Greater Sage-Grouse did not meet the criteria for protection under the Endangered Species Act (ESA) and removed the Gunnison Sage-Grouse from the candidate species list in 2006.	The BLM Manual at 6840 states that the policy for special status specis is to ensure that actions by the BLM are consistent with the conservation needs of special status species and do not contribute to the need to list any special status species under the Endangered Species Act. The BLM, in fulfilling its obligation to avoid listing of the species, has chosen the 1:1 mitigation strategy as the least restrictive mechanism to avoid listing. This 1:1 mitigation does not require off-site mitigation nor does it state that the mitigation must be imposed at the time of the disturbance. The statement has been changed in the

			Therefore, BLM's mitigation proposal is excessive. We remind BLM that in accordance with valid existing rights, the agency does not have that authority to apply conditions of approval (COA) that exceed existing lease rights. Given the fact that the neither of these Sage-Grouse species are listed under ESA, we find the proposal to require a 1 to 1 ratio of habitat improvement outlandish. Since this could only be accomplished by requiring off-site mitigation, we object to this proposal. As mentioned previously in these comments, it is BLM's policy that off-site mitigation can only be accomplished if VOLUNTEERED by an operator. BLM's role is limited to possible identification of offsite mitigation opportunities which also means BLM cannot coerce an operator into performing habitat replacement by threatening to withhold approval of a permit. In addition, we object to the broad application of timing stipulations on areas that may not be suitable habitat for either the Greater or Gunnison Sage-Grouse. The stipulations must be limited to specific areas known to contain active leks. Moreover, BLM's excessive restrictions in its proposal to prohibit all above ground facilities within two miles of an active lek prevent any flexibility for addressing each case individually. Many other measures are available to mitigate perceived impacts without resorting to this inflexible restriction.	PRMP/FEIS that the 1:1 mitigation is a recommendation. See response to comment 214-4 regarding valid existing rights. See response to comments 203-40 and 121-26.
Public Lands Advocacy	491	13	Gunnison Prairie Dog Habitat – BLM proposes under Alternative C to prohibit permanent above-ground facilities within 1,300 feet of prairie dog colonies. Comment and Recommendation: This proposal is overly restrictive and inflexible. It is assumed that the	See response to comment 214-25. This stipulation was developed in coordination with the U.S. Fish and Wildlife Service. The BLM recognizes an error for Alt C where the 1,300 feet restriction specified for colonies should be 660 feet.

			concern relates to predation from above-ground facilities. BLM should be aware that there are many alternatives to preventing predation rather than resorting to a ban on certain facilities. This management approach only serves to make oil and gas development needlessly burdened and should be eliminated.	The PRMP/FEIS has been changed to correct this error. In addition, exceptions are identified in Appendix C that allow flexibility in the placement of facilities.
Public Lands Advocacy	491	14	Pronghorn Antelope: BLM proposes in Alternative to extend the timing limitation stipulations by two weeks. Comment and Recommendation: No scientific justification for this extension is provided. Absent justification, this seemingly arbitrary restriction must be returned to its original time frame.	The timing limitation for pronghorn is during the kidding season. Although Alt A is two weeks shorter than the action alternatives, the proposed timing limitation is based on recommendations by UDWR, the agency with jurisdictional authority on pronghorn.
Public Lands Advocacy	491	15	BLM's socioeconomic analysis is fundamentally flawed because it failed to address the positive aspects of energy development. Moreover, it also failed to analyze and document the negative economic impacts of the severe restrictions proposed under each management alternative. The current unavailability of lands with high potential for mineral development coupled with the increased restrictions contained in Alternatives B and C will have significant negative economic impacts on local, state, and federal revenues, not to mention the negative impacts on domestic energy supplies and cost to the consumer. We are also concerned that the analysis manipulates the impacts associated with Alternative B. The analysis shows that the impacts associated with Alternative B, the most restrictive alternative, would have little more impact than Alternative C and D. This result is highly suspect because the alternative would make 43% less acreage available for oil and gas leasing. Therefore, it is necessary for BLM to revise its socioeconomic significance criteria. For example, the energy sector generally generates a tremendous amount of Value Added. Part of this the higher than average employee	See response to comments 203-25, 203-26, and 203-27.

			compensation but also the higher returns on capital. Another variable that needs to be included in the RMP is Employee Compensation. Apparently these factors were not addressed in the analysis.	
Outward Bound Wilderness	630	1	I feel that it is important for our organization and many other commercial and private users to create a management plan for the Labyrinth Canyon area that ensures future users can enjoy the river corridor. Outward Bound brings students from all over the country and parts of the world to Labyrinth Canyon for its quiet and subtle beauty that is a crucial river corridor classroom for our students. Allowing the management plan to change in such a way that will allow more motorized users to be in the area and not protect the wilderness characteristics will impact (audibly and visually) the current quality of Labyrinth Canyon in a negative way.	The DRMP/EIS proposes to manage the entire Green river corridor as no surface occupancy for oil and gas and all other surface disturbing activities. That portion of the Green River from the San Rafael River to Canyonlands National Park is recommended for Wild and Scenic River status. Many routes along or near the Green river have not been designated for motorized travel to protect riparian resources. The management of the Green River is more restricted under the new Moab RMP than under the old Grand RMP.
Outward Bound Wilderness	630	2	How is the BLM ensuring that areas with Documented Wilderness Characteristics are being appropriately monitored and preserved? How is the BLM ensuring that new routes are not being established? How is the BLM taking into account noise from these new routes and how they may audibly and visually affect the non-motorized users of Labyrinth Canyon?	Those areas of Wilderness Characteristics that the BLM choses to manage for are being managed as no surface occupancy in the preferred alterantive. No new routes would be authorized in areas managed as No surface occopancy. BLM does not manage the noise of motor vehicles. This is a matter of state law.
Outward Bound Wilderness	630	3	The BLM preferred alternative in the Moab RMP seems to favor designation and opening of more motorized routes yet downgrades and eliminates many Wilderness Characteristic areas, often in the same area. In lands administered by the Moab Field Office, a large amount of land with Wilderness Characteristics is adjacent to the Green River – why is it that the BLM finds it necessary to designate and open more routes in these areas vs. designating other areas as recreation areas for OHV users?	The DRMP/EIS drops approximately 2,500 miles of route from motorized travel, including many near or along the Green River. No new motorized routes are proposed in the preferred alternative.
Outward Bound	630	4	The BLM should consider blocking roads and/or making trailheads on each road ½ - 1 mile up each canyon	In some of the canyons approaching the Green River, the route actually starts on the river and moves up the canyon

Wilderness			before it opens to the Green River corridor. This would allow for both user groups and still allow foot access to motorized users. (This approach works well for Range Creek Canyon in Desolation Canyon and could be applied here)	(e.g. Mineral, Hell Roaring and Spring canyons). This approach would thus not work in these canyons.
Outward Bound Wilderness	630	5	There are “new roads” that have been established by OHV users that would not have been considered viable roads that may now be considered as viable. Many of these roads are in areas that have been labeled as having Wilderness characteristics. These areas include: -The route on the river left miles 93-91.5 and up the small canyon at mile 91.5. -The route from Spring Canyon (river mile 66.5) heading downriver towards the Mineral Bottom Road	The roads referred to by the commentator are along the Green River. The first is in the Placer Bottom area. This route was built to access mining operations before World War II. The second route (which does not go all the way to Mineral Bottom) was built during the 1950's uranium boom and is not a "new road". Althouygh these routes may recently have been adopted by OHV users, they were not established by them.
Outward Bound Wilderness	630	6	A further request on these issues, is how the current management plan proposes to ensure that there are not further “new routes” made in areas that have documented Wilderness Characteristics. To best help guide the public in making comments about the new management plan I feel the onus is on the BLM to show the public what routes are “new” and what routes are old since the last management plan was published. Without that information I do not feel the BLM is providing information necessary to inform the public about the impact of the management plan. (Has there been any NEPA work done on any of these new “routes?”)	All of the full sized vehicle routes proposed in the Moab RMP are old, pre-existing routes. Some of the user-made motorcycle trails do not fall into this category. At the establishment of the Moab RMP, a set of designated routes would be established. Future additions to these routes would require NEPA analysis, including archaeological clearances. It should be noted that the Moab DRPM/EIS proposes to close over 2,500 miles of existing route.
Outward Bound Wilderness	630	7	Hatch Point: The Hatch Point Area has been a place where our coursese have traveled though Hatch Canyon and its tributaries, then up across Hatch Point, then finding their way down into Lockhart Basin. This area has a real remote feel to our students and offers us a chance to travel through canyons from the La Sal Mountains to the Colorado River as part of an extended backpacking experience. The idea that there may be an energy development out in that area is in direct conflict with our students looking to have an extended	The visual resources of Hatch Point are considered in the imposition of controlled surface use restrictions on oil and gas development.

			backcountry expedition where they are away from the development of modern man. We would request that the BLM has no surface occupancy in this area for oil and gas development and takes into account the visual impact of any oil and gas leases in the area. In addition, the opening of any new roads in the area would also be in conflict of the use that we have in the area.	
Florida 4x4	649	1	Trail segments that should be included: Flat Iron Mesa – From about 4346450 N 636300 E heading NW to the pipeline road. From about 4345600 N 634700 E going SW to Plan trail 2. From 4246200 N 633400 E going SW to the county B road 4. From about 4242400 N 633400 E south then east to the plan road.	See response to comment 206-17.
Florida 4x4	649	2	Trail segments that should be included: Strike Ravine – A portion of the “Big Ugly” hill at about 4254500 N 636600 E. The north-to-south section accessing and traversing the property purchased by Kiley Miller (note: San Juan County has continuously supported this right of way in claim court).	The Strike Ravine Jeep Safari Route is in the Travel Plan accompanying Alt C of the DRMP/EIS. See also response to comment 206-11.
Florida 4x4	649	3	Trail segments that should be included: 3-D Trail – From about 4285900 N 609900 E north then west to 4286400 N 609300 E	See responses to comments 206-11 and 206-17.
Moab Solutions	830	1	I'd like to add my voice to the others calling for the BLM to extend the comment period on the new plan. I liked the way the Tribune put it in last Wednesday's paper.	See response to comment 124-1.
Sage Riders Motorcycle Club	870	1	The final DRMP should include 25 miles of additional routes, Utah Rim Trails, in order to be as complete as the Dee Pass network. In particular, long-distance single-tracks and rugged roads that connect SRMAs offer a unique experience. The Copper Ridge Motorcycle Loop should be combined with Thompson Trail in the final plan. We recommend that more non-riparian washes should be left open, especially in the Cisco Desert. These travel ways provide ATV and motorcycle riders an unconfined challenge that roads cannot offer. We are concerned that many of the restrictions in all of the Action Alternatives are simply	See response to comments 122-39 (Utah Rims), 122-36 (Copper Ridge) and 122-29 (Thompson Trail). For a discussion of travel in washes, see response to comment 122-14. For a discussion of adding new routes, see response to comments 122-15 and 122-30.

			not justified and the FEIS should clearly draw a connection between the facts on the ground and the decision made.	
Sage Riders Motorcycle Club	870	2	Some of the "motorcyle trails" are vary popular with the ATV users. The Final Travel Plan should designate a mix of single track and ATV trails.	See response to comment 120-90.
Sage Riders Motorcycle Club	870	3	The Final EIS should disclose how many campsites would be closed under each alternative.	See response to comments 120-86 and 123-8.
Sage Riders Motorcycle Club	870	4	We are requesting that the final RMP should direct land managers to work with the affected public to ensure all available mitigation efforts have been exhausted before closure. When using adaptive management principals, the RMP should mandate the mitigation of closing routes and areas to recreational use by designating a more sustainable, but similar recreational opportunity elsewhere.	Working with volunteers and interest groups does not require a planning decision.
Sage Riders Motorcycle Club	870	5	The Sage Riders recommends that when addressing "user conflict" , the final RMP should avoid "exclusive use zones" where, based on perceived or potential "user conflict", one or more "conflicting uses" is categorically prohibited. Most of the non-motorized focus areas have designated routes open to motorized vehicles within them. If implemented as written in Alternatives B, C, and D, many visitors will preceive these focus areas as establishing blanket restrictions on motorized use. The unintended consequences will likely result in increasing, not reducing actual or perceived "user conflict".	Focus Areas are not intended as exclusive use zones. This is clearly stated in the Recreation section.
Sage Riders Motorcycle Club	870	6	We recommend in order to address the "user conflict" issue, the Final RMP should direct land managers to educate non-motorized visitors (who may percieve conflict with motorized uses) where they may encounter vehicle traffic in certain areas as well as informing them of areas where they may avoid such encounters. The Final RMP should direct land managers to educate vehicle-assisted visitors of where a road or trail might	Education is not a land use planning issue.

			be shared with non-motorized visitors, and if appropriate, direct slower speeds.	
Sage Riders Motorcycle Club	870	7	The Sage Riders is requesting that the Travel Plan and the Administrating Setting must be consistent in all SRMAs! All SRMAs with a motorized focus should include direction regarding when and how additional or expanded routes/areas would be provided should there be a need. SRMAs and their "focus areas" should avoid excluding other uses categorically. The Preferred Alternitave clearly shows Moab BLM recognizes the importance of providing some motorized routes in non-motorized zones.	Focus Areas are not intended as exclusive use zones. For the addition of new routes, see response to comments 122-15 and 122-30.
Sage Riders Motorcycle Club	870	8	The Utah Rims SRMA should extend further southwest to encompass Mel's Loop and beyond. Increased visitation there warrents the more active management of a SRMA. This larger area would also provide enough room for a full-day's motorcycle ride, and the establishment of a mountain bike focus area.	See response to comment 122-39.
Sage Riders Motorcycle Club	870	9	This area has very few miles of true mountain biking single track trail. Concerning Mill Canyon, Sevenmile Rim biking focus area should be redrawn as Mill Canyon- Tusher Rims in order to provide better terrain for pedaling. The Final Plan should extend the South Spanish Valley biking area further south toward Black Ridge.	The new SRMA boundaries suggested by the commentor were not analyzed in the DRMP/EIS.
Pack Creek Water Company	904	1	The riparian area, between the Pack Creek community and down stream to the Pack Creek Bridge and Adjoining areas, needs special care by the BLM and protection from erosion and pollution due to grazing.	The riparian area around Pack Creek is to be managed as no surface occupancy in the preferred alternative. Grazing in the Pack Creek area must be addressed during the permit renewal process.
Pack Creek Water Company	904	2	We request the BLM addresses and stabilize this riparian area and streambed as soon as possible. Please advise us of BLM plans to deal with this stretch of Pack Creek and any other plans to address erosion issues in the seriously damaged Pack Creek watershed. Furthermore, we ask that the BLM inform and advise the Pack Creek Water Company on all	Grazing in this allotment will be addressed during the permit renewal process. The Pack Creek Water Company should ask to be an interested public for this process.

			watershed matters, actions, and proposed future actions that affect it and the Pack Creek Community. It is important to us that we be considered a joint stakeholder in all matters that affect us.	
Moab Area Climbers Association	962	1	The map for option C shows a number of areas, most notably Upper Kane Creek and Tusher Canyon/ Mill Creek, as VRM-1. These areas are important to climbers. As such, we of course want them to be as beautiful as possible. Unfortunately, the VRM-1 status, being the highest level of visual resource management, could be construed in the future to curtail any activity, including climbing. If the VRM-1 status would mean changing the conditions that make climbing safe and enjoyably in those area's, then we are opposed to it.	In Alt C, the only VRM I area outside the WSAs is the Shafer Basin. Neither Upper Kane Creek nor the Tusher Canyon area are to be managed as VRM I in the preferred alternative.
Moab Area Climbers Association	962	2	While the area that is proposed to be habitat for Mexican Spotted Owl nesting (near the potash plant and ponds) is not heavily used by climbers, the closure seems somewhat expansive. None of our members, who include biologists as well is the most experienced climbers in this region, have ever found this species of owl nesting in the area. To have such a large area be deemed off-limits for a species that none of us have ever seen seems out of character with the way the habitat management plan is established. If this area is deemed critical to the currently nesting birds, we understand the need for a permited closure. However, it would not be acceptable to close such large section of cliff simply because it 'might' be a nesting area. A copy of the habitat management plan, which would explain how the areas were designated to be so large, would greatly aid in the publics understanding.	There is a nesting Mexican spotted owl pair in the Potash area. Actions to protect this species are restricted as a site specific level and are based on the Protected Activity Center surrounding the actual nest site. The BLM is unaware of any restrictions that Mexican spotted owl have imposed upon the climbing community.
Moab Area Climbers Association	962	3	Climbing venues such as Potash Road, The River Road, Longs Canyon, Castle Valley, The Fisher Towers, and Tusher Canyon are coveted destinations for climbers from all over the world. The MACA would like to see the D.R.M.P. formally aknowledge that climbing is a legitimate use of public lands around	The BLM has recognized the importance of climbing as a recreation activity in the DRMP/EIS. Wall Street (along the Potash Road) is recommended for management as a climbing focus area. The placement of toilet facilities does not require a land

			Moab. We also feel that certain areas in Kane Creek and on Potash Road are popular enough that toilet facilities are warrented. We would be able to work with the BLM, as The Access Fund and Friends of Indian Creek have done in the past, to help aid the building of these much- needed facilities.	use planning decision.
Moab Trails Alliance	964	1	To understand and comment on this draft is a daunting task for anyone other than those intimately involved in the process. I would recommend in the future, that a trusted representative from each of the user groups be hired to review and prepare a position paper that others in that user group could use in formulating their own responses.	Comment noted.
Moab Trails Alliance	964	2	It is blantantly obvious that the old ways of sharing jeep routes with everyone, the basis of mountain biking in Moab, no longer works. Gemini Bridges, Poison Spider Mesa, and Gold Bar Rim are classic examples. With new 4-wheeled drive technology the alterations (damage) to the trails are such that cyclists cannot use the same route unless they like taking their bike for a walk. The Grand County Non-Motorized Trails Master Plan proposes alternate routes in each of these areas. The Green Dot (Gemini area), Blue Dot (Gold Bar Singletrack listed in "D"), and Wags Way (Poison Spider area) Trails should be priority projects ASAP. These are user created routes that traverse slickrock in areas that have been overrun by motorized traffic.	The routes considered in the alternatives for the Travel Plan accompanying the DRMP/EIS were those submitted by the public during the scoping period, including those submitted by Trail Mix and Moab Trails Alliance, and verified on the ground by BLM staff (see pgs. G-15 through G-21). On pg. 2-48 of the DRMP/EIS there is a provision for adding new routes. The provision states “identification of specific designated routes would be initially established through the chosen travel plan accompanying the RMP and may be modified through subsequent implementation planning and project planning on a case by case basis”. New routes proposed by the commentor will be considered after completion of the Record of Decision for the Moab RMP unless those routes are in a closed area. However, at the completion of the RMP, all travel will be restricted to the routes designated in the plan.
Moab Trails Alliance	964	3	After a few years of trying to develop new trails in the Moab Field Office it is apparent that our niche here is slickrock. The predominantly sandy soils make for maintenance nightmares and undesirable routes. MTA recommends that more slickrock routes be developed and marked. A route from the Monitor-Merrimack area over to SR313 is an example. Slickrock riding made	The DRMP/EIS provides for the addition of new mountain bike routes throughout the life of the plan. Up to 75 miles of new route is authorized in Alt C. Site specific NEPA analysis will be undertaken to approve new routes.

			Moab famous, it is low impact, and is what will keep people coming back. The Bartlett Wash Freeride area in "C" is a great idea.	
Moab Trails Alliance	964	4	The Slickrock Trail, up until a few years ago was thought to be open to cross country travel for bikes. Any resource damage, i.e. Crypto crushing or tree destroying was taboo. The Federal Register rules limiting travel to "designated routes only" are temporary until this RMP is adopted. The Slickrock Trail should be open to cross-country travel for bicycles (stated in Alternative "D") because it is the perfect practice area for beginner riders, the perfect technique area for experienced riders and the classic setting for tour companies to introduce clients to the ecology, geology, and scenery of Grand County. It is regulated and patrolled and this designation is consistant with historic use.	Alt C of the DRMP/EIS restricts travel on the Slickrock Trail to the designated route. The level of traffic on the Slickrock Trail does not lend itself to open free riding by mountain bikes. A slickrock free ride area for bicycles is provided in Alt C at the Bartlett Slickrock.
Moab Trails Alliance	964	5	The amount of new trail ("C"= 150 miles, "B"= 75, etc.) should be specifically stated as, "In addition to trails developed on existing roads as mapped on the Grand County Transportation Inventory map". The allotted new mileage will include only those routes mapped across previously undisturbed terrain.	Wording has been added to the text on pg. 2-49 to clarify that the "new trail" is in addition to decommissioned existing routes on the Grand County Inventory Map.
Moab Trails Alliance	964	6	It is a sore spot with with OHVs. The definition of OHV in the glossery on page X-37 precludes bicycles from this category. The explaination hidden at the bottom of G-5 groups motorized and mechanized together. Please remove bicycling from from any definitions of OHVs and other all-encompassing variations of "wheeled vehilcle" classifications. While a bicycle has wheels, this is the extent of any similarity with motorized forms of transportation. Placing mountain biking within the non-motorized category is consistant with the BLM National Mountain Bicycling Strategic Action Plan and many other BLM management plans across the country.	The DRMP/EIS has attempted to classify mountain bikes as their own category. Mountain bikes are restricted to designated routes, but any other definition of OHV's does not include mountain bikes.
Moab Trails	964	7	Please do not ban bicycling from non-WSA (ACEC)	Bicycles are allowed on all routes open to travel by

Alliance			lands. MTA does not advocate for access to all trails and areas, but believes this particular policy might be based on the false assumption that bicycling would damage the wilderness characteristics of such lands. This is not true: as mentioned above, the environmental impacts of mountain bicycling are similar to hiking and far less than equestrian or OHV use. In fact, the BLM Wilderness Study Area Intrim Management Policy H-5880-1 (Wilderness IMP) does not categorically ban mountain biking from WSAs. MTA requests that the Moab RMP adopt a management policy that would permit bicycling on some trails in non-WSA (ACEC) areas. While bicycling may not be appropriate on some trails in these areas, others can provide a welcome relief from front-country and motorized areas. A decision to ban this use should be based on scientific reasoning.	wheeled vehicles. There are several trails mentioned in the DRMP/EIS that are restricted to hikers (such as Fisher Towers). There is no blanket ban of cycling on non-WSA lands in the Moab planning area.
Moab Trails Alliance	964	8	Whenever different user groups are listed in the RMP, road cycling should be included as a category just the same as "driving for pleasure". This is fast becoming a popular use on the spectacular scenic byways of Grand County.	Road cycling has been added to the list of recreation activities in the Moab Field Office on pg. 3-80 of the DRMP/EIS.
Moab Trails Alliance	964	9	The alt Lake Tribune article 11/04/07 titled BLM Off-Road Excess Plans Need More Caution, Review by Daniel Patterson states that the number of miles of ORV roads in the Moab field office totals 5000, and the total throughout southern Utah would be 10,000. "Imagine driving three times across America on an ATV." That clearly makes the number sound excessive. It does not explain that some of these miles would be designated non-motorized for future biking and hiking trails. Perhaps this plan should put a percentage number on how much each user category would get out of these endless miles.	Alt C designates 2,527 of non-maintained dirt roads and 1,166 miles of regularly maintained dirt roads in the Moab Field Office. These routes are available to all motorized (and non-motorized) users. Those inventoried routes not designated (over 2,500 miles) would be available for non-motorized users.
Moab Trails Alliance	964	10	As avid defenders of biological soil crusts, MTA suggests they be highlighted as a star feature of the desert, thus emphasizing their importance. MTA along	The DRMP/EIS is a planning tool that guides BLM actions in the future. Its purpose is not an educational tool for the public. The DRMP/EIS does mention the importance of

			with Trail Mix spends significant resources on public education and crypto biotic soil and this publication is an excellent opportunity to headline their attributes. The restrictions in this plan would be more palatable if readers completely understood the role these crusts play in holding the desert together.	biotic soil crusts.
Moab Trails Alliance	964	11	Typos: p. 4-464 second paragraph line 4 "carefully" should be careful	This typographical error has been corrected.
Moab Trails Alliance	964	12	Typos: p. I-8 Under Relevance Criteria, seventh line, "……threatened plants do not occur….." Shouldn't "do not" be deleted or else the whole sentence be deleted?	The sentence has been corrected
National Parks Conservation Association	970	1	BLM's air quality analysis is flawed because they have utilized old data in the visibility analysis for Class I areas. The visibility trend is from 1988 to 1997. However, according to the National Park's Service's 2005 GPRA report, the air quality for Arches and Canyonlands is deteriorating. BLM erroneously states that Table 3.2 contains "the most recent available data for each pollutant." More recent adapt from 2005 and 2006 is available. This analysis is further severely flawed because BLM has failed to incorporate the air quality data from Canyonlands monitoring station in Table 3.2, Ambient Air Quality Data for the MPA and has not utilized this data in its analysis.	Table 3.2 has been updated with 2007 air quality data.
National Parks Conservation Association	970	2	BLM assumes they will have the funding and the workforce to implement the selected alternative. The area of focus is huge-1.8 million acres. The proposed increase in oil and gas development and impacts on resources from recreation uses including off road vehicles is so substantial, that we don't believe that the agency has sufficient financial and human resources to implement the preferred alternative. Additionally, BLM assumes that non-BLM lands would be minimally directly impacted by RMP decisions simply because BLM does not make land decisions on non-BLM lands. This is circular and erroneous. Decisions made by adjacent land managers such as BLM have a huge	BLM lands are managed under FLPMA, which directs the agengy to manage the public lands for multiple use. See response to comment 121-1 for a definition of the multiple use. The BLM has developed stipulations to protect the values of the surrounding national parks. For example, a controlled surface use stipulation has been imposed on oil and gas development surrounding Arches National Park. This controlled surface use stipulation states that oil and gas development cannot be within the viewshed of key observation points within Arches National Park.

			potential to impact non-BLM lands, in particular the national parks in the region. Many uses permitted on BLM lands are not compatible with the mission and protection of the national parks such as Arches and Canyonlands. Air pollution, visibility, soundscapes, nightskies, and wildlife corridors are all impacts that do not respect boundaries.	The BLM assumes that it has the resources to effect the RMP. On pg. 1-13 of the DRMP/EIS, it states that BLM would hjave the funding and personnel for managing programs.
National Parks Conservation Association	970	3	All Alternatives of the RMP has oil and gas leases immediately adjacent to the boundaries of Arches NP. This is extremely concerning given the enormous potential impacts on viewsheds and resources within the Park and the impact on visitor experience. Some examples include the areas outside of Delicate Arch on Dome Plateau and the leases on Yellowcat Flat that would impact the campground, some of the most popular trails in the Park such as Devils Garden and many of the most popular Arches including Double O, Private Arch, Wall Arch, and Navajo. We request that BLM include an alternative that creates a buffer zone in the sensitive area adjacent to national parks.	Alt C of the DRMP/EIS creates an area of controlled surface use for oil and gas leasing around Arches National Park. This stipulation requires oil and gas facilities to not be visible from the National Park. This is stated on pg. 2-51 of the DRMP/EIS: "Public lands within the viewshed of Arches National Park would be designated as VRM Class II." VRM Class II requires controlled surface use stipulations for oil and gas. Valid existing rights are not affected by the current planning effort.
National Parks Conservation Association	970	4	BLM fails to address potential impacts from ozone due to oil and gas development. According to the National Parks Service, “Tropospheric (ground-level) ozone concentrations were monitored in the park from 1987-1992, and are currently monitored in Canyonlands NP, 1992-present. An analysis of the data indicates that ozone concentrations have significantly increased in the park. The observed concentrations in Canyonlands NP fall within a range that may produce visible effects or growth effects on sensitive plant species under certain conditions. It is likely that ozone concentrations in Arches NP are similar.” NPS goes on to state “Several plant species that occur in Arches NP are known to be sensitive to ozone (e.g., Rhus trilobata).” Studies already conducted in other Utah national parks including Bryce, Zion and Cedar Breaks have demonstrated symptoms of “ozone injury” on plant	Predicting ozone associated with oil and gas development requires air dispersion modeling, which was not used in this analysis. Estimated emissions of NOx and VOCs are included in the analysis, both of which are precursors to ozone formation. Increases in VOCs and NOx are estimated to be 7% and 4% respectively under the PRMP.

			species. BLM has relied on out-dated air quality trend data in determining their preferred alternative will have no impacts on the air quality in the affected Class I airsheds. The BLM is obligated to re-analyze their finding based on the most current air trend data, which is already showing a decline in air quality. In Chapter 4.3.1 BLM states incorrectly “Background CO, Nox, and SO2 concentration information was not available within the MPA.” They have again ignored air data from Canyonlands monitoring station and should be required to re-asses the air quality data utilizing the most comprehensive data.	
National Parks Conservation Association	970	5	Projected emissions rates for gas compressors (Table 4.6) were based on best available technology limits. However, nothing in the plan requires the application of BACT. BLM needs to have permit conditions consistent with their analytical data.	Chapter 2 of the DRMP/EIS on pg. 2-7 states that the best air quality technology, as per guidance from the Utah Division of air quality would be applied to actions on public lands as needed to meet air quality standards. It goes on to state "Manage all BLM and all BLM authorized activities to maintain air quality within the thresholds managed by the State of Utah ambient air quality standards and to ensure that those activities continue to keep the area as attainment, meet prevention of significant deterioration (PSD), and protect the Class I airshed of the National Parks (e.g. Arches and Canyonlands).
National Parks Conservation Association	970	6	Night skies are an important resource at Arches and Canyonlands NP. This resource is affected by both air quality and light emitting sources. The BLM has completely failed to address the impact that increased oil and gas development would have upon the pristine night skies within the parks. This resource is a critical component of the visitor experience.	In the Preferred Alternative of the DRMP/EIS the viewshed from Arches is managed as VRM II. Tthe major viewshed from Canyonlands is Shafer Basin which is proposed as VRM I. Night lighting can mitigated in a VRM II area and night lighting would be excluded in a VRM I area. Impact to night skies would be considered a cumulative impact within these site-specific analyses.
National Parks Conservation Association	970	7	It is particularly troubling that BLM has included designated ORV routes that are within the boundaries of Arches NP. This error needs to be removed. The BLM also needs to address how it will monitor routes it	The BLM does not make decisions on route designations within Arches National Park. The routes shown on the map within the park have been deleted from the PRMP/FEIS.

			intends to designate that run up to the park boundaries.	Those designated routes that run up to the park boundaries may be monitored by either the BLM or the park. If these routes are causing damage in the park, they can be closed on a site specific basis after the completion of the RMP. Page 2-48 of the DRMP/EIS states that adjustments to the Travel Plan may be made at a site specific level, using the NEPA process.
National Parks Conservation Association	970	8	4.3.24 of the draft RMP is purported to address cumulative impacts of the environmental consequences of the alternatives. In listing the "activities contributing to cumulative impacts to air quality" BLM fails to list the air pollution impacts from oil and gas including ozone, SO2, NOX. Instead, BLM only mentions surface-disturbing activities from oil and gas. Additionally, BLM inadequately addresses the impact from other oil and gas development and potential increases in activity from surrounding BLM areas, most of which are also releasing DRMPs.	Analysis of oil and gas impacts includes calculation of emissions associated with compressors, glycol dehydrators, flaring, and surface disturbance. The sections have been updated with the new analysis.
National Parks Conservation Association	970	9	The primary purpose of NEPA is for Federal Agencies to identify the effects of their actions on the environment and the significance of those effects (CEQ 1502.16). It was the intent of Congress, with the passage of NEPA that Federal agencies would make informed decisions regarding the consequences of their actions and also to inform and involve the public in this process. Congress intended for better decisions to be made as a result of this information and with the involvement of the public affected. The Moab RMP completely fails in this regard because the significance of the environmental impacts of the Proposed Action and all alternatives are not identified for any of the resource categories. Therefore, it would be impossible for the BLM to make a fully informed decision as to the consequences of their actions or for the public to meaningfully evaluate and comment on the	The BLM complies with NEPA and CEQ. A Resource Management Plan is a land use plan. An environmental impact statement accompanies the RMP because significant impacts can result from the decisions in the RMP. The significant impacts are disclosed in the EIS accompanying the RMP. Chapter 2 summarizes the impacts of each alternative and compares them.

			alternatives without knowing the significance of the anticipated effects of the alternatives. The BLM not only failed to follow the implementing regulations of NEPA but failed to meet the most basic underpinnings of law. We are requesting that the draft RMP be revised to include an analysis of the significance of environmental effects and to reissue the draft for review and comment.	
National Parks Conservation Association	970	10	In Chapter 5, BLM states who they are required by Federal law to consult with during an EIS process. BLM has erred in excluding the National Park Service as a cooperating agency. They have ignored the directive outline in the Jan 30, 2002 Memorandum from James Connaughton, Council on Environmental Quality (CEQ) Chair, which states that “The purpose of this Memorandum is to ensure that all Federal agencies are actively considering designation of Federal and non-federal cooperating agencies in the preparation of analyses and documentation required by the National Environmental Policy Act (NEPA), and to ensure that Federal agencies actively participate as cooperating agencies in other agency’s NEPA processes. The CEQ regulations addressing cooperating agencies status (40 CFR § 1501.6 & 1508.5) implement the NEPA mandate that Federal agencies responsible for preparing NEPA analyses and documentation do so “in cooperation with State and local governments” and other agencies with jurisdiction by law or special expertise. (42 USC § 4331 (a), 4332(2)). Despite previous memoranda and guidance from CEQ, some agencies remain reluctant to engage other Federal and non-federal agencies as a cooperating agency. In addition, some Federal agencies remain reluctant to assume the role of a cooperating agency, resulting in an inconsistent implementation of NEPA. Studies regarding the efficiency, effectiveness, and value of NEPA analyses conclude that stakeholder involvement is important in ensuring decisionmakers have the environmental	See response to comment 124-142.

			information necessary to make informed and timely decisions efficiently." Cooperating agencies are required to be involved in: identification of issues (43 CFR § 1610.4-1); development of planning criteria (43 CFR § 1610.4-2); inventory data and information collection (43 CFR § 1610.4-3); analysis of the management situation (43 CFR § 1610.4-4); formulation of alternatives (43 CFR § 1610.4-5); estimating effects of alternatives (43 CFR § 1610.4-6); selection of preferred alternative (43 CFR § 1610.4-7); and selection of resource management plan (43 CFR § 1610.4-7). See also, BLM's "A Desk Guide to Cooperating Agency Relationships." The exclusion of the NPS from cooperating agency status has limited the input from this most qualified agency on the import of effects on Arches National Park and Canyonlands NP and on the preferred approach to managing these effects. BLM must invite the National Parks System to act as a cooperating agency for the remainder of the RMP revision, including assessment of comments and recommendations for revising the Preferred Alternative. In addition, the NPS should be given the opportunity to review the information previously provided to the other cooperating agencies, and then provide input on the analysis of effects and management recommendations pertaining to Arches National Park and Canyonlands National Park.	
Howard County Bird Club	972	1	We rely on land-managing agencies like BLM to advise us, through regulations and closures, which routes are not suitable for ORVs because of potential damage to the land and wildlife habitat. We want the agencies to place protection of the habitat as the highest priority. Every ORV route creates impacts harmful to wildlife	The preferred alternative of the Travel Plan considered purpose and need for each route versus any resource conflicts the route may have had. Wildlife habitat was considered a resource conflict, and routes were removed from the Alt. C travel plan for this reason. The route designation plans removes over 3,000 miles of existing

			habitat. The impacts can be especially severe where the route is subject to erosion, where routes involve fording streams, and where too many routes fragment blocks of wildlife habitat. The ORV routes in Alternative C (shown in map 2-11-C) are a dense network with many redundant routes, many that intrude on essential wildlife habitat, and many that would degrade the wilderness character of areas proposed for wilderness designation in America's Red Rock Wilderness Act. A total of 2,642 miles would be open to ORVs. In this planning area of 4,300 square miles, that means an average of six-tenths of a mile of ORV route for every square mile in the planning area. We urge BLM to exclude ORVs from the important wildlife and scenic areas.	route from designation. In addition, all lands (with the exception of 2,000 acres) are limited to designated routes, removing over 600,000 acres from the "open to cross country travel" category. The impacts to wildlife habitat from these actions are beneficial. In addition, see response to comments124-15 and 124-55.
Howard County Bird Club	972	2	We compliment BLM for reviewing wilderness characteristics of the areas proposed in America's Red Rock Wilderness Act, although we may disagree with some of BLM's conclusion. We urge that all the areas proposed in that bill be held under protection until Congress has made decisions on wilderness designation. It is unfortunate that the Department of the Interior still clings to the unreasonable policy that no more areas will be recommended for wilderness stattus. That will change, and BLM will again be able to support deserving lands for protection as wilderness. In the final plan BLM should add protection for wilderness character of all qualifying.	The BLM chooses to manage three of the non-WSA areas with wilderness characteristics to protect those characteristics in Alt. C. However, of the 266,485 acres of non-WSA lands that were found to have wilderness characteristics, 105,963 acres (40%) are either closed to leasing or have a no surface occupancy stipulation on the leases. Four of these areas would be protected, in whole, from all surface disturbing activities: Beaver Creek, Gooseneck, Mill Creek Canyon, and Shafer Canyon. The BLM has no obligation to protect all lands that it has inventoried as having wilderness characteristics. See also response to comment 124-53.
Howard County Bird Club	972	3	The __ft EIS (map 3-2) indicates that most lands in the planning area have "high potential" for oil and gas development. Members of the Howard County Bird Club have seen oil/gas drilling just north of Canyonlands National Park, off State Highway 313, as well as in major gas fields north of Cisco and nearby in Colorado. It would be a mistake to promote drilling in valuable wildlife areas, in proposed wilderness, or near the	Map 2-5-C of the DRMP/EIS shows the areas that are to be protected from oil and gas development in Alt. C. The no surface occupancy restriction would not allow surface disturbance in areas to the east of Canyonlands National Park, along the Colorado, Dolores and Green Rivers (which are very important wildlife habitat), in desert bighorn sheep migration corridors and lambing habitat, and other areas. Furthermore, additional wildlife

			national parks. The final plan should clearly define the areas to be protected for these values, so development can be steered into less critical areas. In the Moab plan, there need not be a conflict, because "high potential" extends throughout the planning area.	restrictions are proposed for Alt. C. There are many acres subject to timing limitations to protect wildlife.
Howard County Bird Club	972	4	The watercourses and the riparian habitat along them are crucial for wildlife in this arid region, both resident species and those migrating through the Colorado Plateau region. BLM identified this as one of the 10 issues to be addressed in the Moab RMP (page 1-9). A total of 32,800 acres is identified by BLM as riparian habitat. Some 26,000 acres of this is within grazing allotments, and 34 percent of those lands were found to be "functioning-at risk," 11 percent as "not functioning" (page 3-35). We commend BLM for recognizing this problem. We ask the bureau to close jeopardized riparian habitat to grazing as proposed in Alternative B. We urge further closures to ORV traffic and mineral leasing to protect riparian habitat in areas.	The BLM recognizes the importance of riparian areas for wildlife. Grazing in riparian areas is addressed not at the land use planning level, but rather when the grazing permit is renewed. Standards for Rangeland Health and Guidelines for Grazing Management are utilized to protect riparian areas on a case-by case allotment basis. In designating routes for travel, riparian issues were carefully considered. Of the 2,506 miles of existing route that are eliminated in the Travel Plan accompanying Alt. C, many were removed because of riparian conflicts. Where the purpose and need for the route outweighed the riparian conflict, the route was designated in Alt. C. Indiscriminate cross country travel in riparian areas has been almost entirely eliminated in Alt C, as has indiscriminate OHV riding in dry washes (which are used by wildlife as travel corridors). All surface disturbing activities within floodplains and riparian areas are prohibited in all action alternatives. See Appendix C of the DRMP/EIS, pg. C-5, which states: "Allow no surface disturbing activities within 100 year floodplains or within 100 meters of riparian areas. Also, no surface disturbing a ctivities within public water reserves or within 100 meters of springs."
Howard County Bird Club	972	5	The Green River is a major axis of wildlife habitat, serving as an interstatehighway for migrant birds and a home for resident species of birds and mammals. It is mostly wild, flowing through Dinosaur National Monument, Ouray National Wildlife Refuge, Desolation Canyon, Gray Canyon, Labyrinth Canyon and into Canyonlands National Park, where it joins the Colorado	The BLM has imposed a no surface occupancy stipulation for the entire Green River within the Moab Field Office. This stipulation states: "There would be no surface disturbing activities within the area of the Three Rivers and Westwater mineral withdrawals (which includes the Green River)" (pg. C-5 of the DRMP/EIS). This restriction applies to all surface disturbing activities, including oil and

			River. The Moab plan addresses the segment from Gray Canyon to the boundary of Canyonlands. BLM should be giving better protection to the Green Corridor as a highly valuable area for wildlife and natural landscape.	gas development. These stipulation will provide protection for wildlife along the Green River.
Howard County Bird Club	972	6	The Labyrinth Canyon segment includes habitat for desert bighorn sheep (lambing and rutting habitat), pronghorn antelope, and burrowing owl (maps 2-26, 2-25, 2-24 respectively). It is also a highly valued route for visitors enjoying a quiet float trip. The intrusion of ORVs and oil/gas activities should not be allowed here. We urge BLM to establish the Labyrinth ACEC, expanding it eastward to cover the desert bighorn lambing and migration areas and merging it with the proposed Tenmile and White Wash ACECs. Mesas and tributaries associated with Labyrinth should be included in the ACEC to protect riparian and upland habitats, including Hell Roaring Canyon, Mineral Point, Horsetheif Point, Deadman Point, Spring Canyon Point, and Tenmile Point. The Green sould be recommended for Wild and Senic River status.	Oil and gas leasing and all other surface disturbing activities are prohibited in Alt. C along the Green River and up into its major tributaries (Ten Mile, Spring, Hell Roaring and Mineral Canyons). These prohibitions are imposed to protect the important wildlife habitat that is within these canyons and along the Green River. The entire Greeen River, with the exception of the area between Swasey's Rapid and the San Rafael River, is recommended for Wild and Scenic River designation in the preferred alternative. All OHV use along the Green River is limited to designated routes. All these routes were constructed and have been in use for many years.
Howard County Bird Club	972	7	We commend BLM for ACEC proposal for White Wash sand dunes. We urge you to expand it to cover the entire dunes, cottonwood groves, water sources, and adjoining riparian habitat and desert bighorn sheep habitat.	The ACEC proposal for White Wash Sand Dunes is proposed only in Alt. B. In Alt C, measures are proposed to protect the cottonwood groves and water sources. The Duma Point area (where the bighorn habitat is) is proposed to be managed as no surface occupancy for oil and gas and all other surface disturbing activities. The White Wash area in Alt C includes approximately 2,000 acres of open area. The entire area surrounding the dunes would be managed as limited to designated routes in Alt C.
Howard County Bird Club	972	8	The Colorado River is a second major axis of wildlife habitat. Members of our club visited the river segment between Dewey Bridge and Moab, driving on Highway 128, the senic route from interstate 70 to Moab. It is a stunning introduction to the red rock topography of the	The Colorado River corridor is proposed to be managed as no surface occupancy for oil and gas leasing, and as no surface disturbance for all other activities. In addition, the entire Colorado River is recommended for designation as a Wild and Scenic River. Much of the area mentioned

			Moab district. The Colorado River corridor will need secure protection in the years ahead, because it is threatened by oil and gas development and ORV trails. BLM has recognized wildlife values here for desert bighorn lambing/rutting habitat (map 2-26-B) and has proposed a small ACEC of 50,000 acres. We urge the use of ACEC, ORV closures, and Wild Scenic River status to protect more of the corridor, including Fisher Towers, Fisher Mesa, Dome Plateau, Mat Martin Point, the Dolores River Canyon and its tributaries Beaver Creek and Thompson Canyon. The senic panoramas of these areas are enjoyed by visitors in Arches National Park, as well as those driving on Highway 128. Any damage to this landscape would be a blow to tourism in the Moab area.	by the commentor would be managed to protect its wilderness characteristics. All vehicular travel in the areas mentioned by the commentor is limited to designated routes. In much of the area, a no surface disturbing stipulation is imposed in Alt C, and no new routes would be allowed.
Howard County Bird Club	972	9	Our members visited the Canyon Rims Recreation area and Hatch Point. This is an excellent area for visitors seeking an easily accesible view of the Needles section of Canyonlands National Park and a grand panorama of canyon country. Go___ roads lead from State Highway 191 to Needles Overlook and three other viewing sites along the western rim of Hatch Point. The land between the road and the cliffs is highly valuable for quiet visitor use, where people can watch wildlife and enjoy the great canyon vistas. It is now being degraded by ORV traffic; our members saw tracks of ORVs far from the road. The final plan should close it to ORVs. BLM has recognized habitat here for Sage-grouse (map 2-20), Burrowing Owl (map 2-22), Pronghorn kidding habitat (map 2-25), and desert bighorn sheep lambing/rutting habitat (map 2-26-B). We favor the proposed Canyon Rims ACEC, but it only protects the cliffs. We urge the BLM to use ACEC protection, with a closure to ORVs, for the area between the cliffs and Overlooks Road plus lands on the east side of the road	The Canyons Rims Recreation Area is prposed to be managed as an SRMA in Alt. C. In addition, all travel would be limited to designated routes. Illegal activity off the designated route system is not a planning issue. The BLM assumes adherence to laws, regulations and policies. The Canyon Rims area is recognized as a special visual resource. It has a controlled surface use restriction on oil and gas leasing in Alt. C that protects its visual resources from oil and gas development. See response to comment 1025-11 for the issue of forbidding OHVs across the planning area.

			including all the pronghorn kidding habitat (map 2-25)	
Howard County Bird Club	972	10	Members of our club have stayed in Moab as a base for their exploration of the region. With the concentration of visitor services here and growth in population, it is essential to protect the valuable areas of wildlife habitat close to town before more damage is done by ORVs and mineral development. BLM has recognized desert bighhorn lambing/rutting habitat in the Shafer Basin (map 2-26-B) and proposed ACEC. We favor that proposal, plus Behind the Rocks and Mill Creek Canyon ACECs (map 2-14-B) and protection of Goldbar Rim. These areas are essential wild lands for visitors to Moab.	Alt C of the DRMP/EIS proposes to designate the Mill Creek and Behind the Rocks ACECs. The Goldbar Hiking Focus Area is also managed as no surface occupancy for oil and gas leasing and all other surface disturbing activities. This stipulation will provide protection for wildlife habitat. All vehicular travel within the Moab planning area (except for 2,000 acres in the White Wash Sand Dunes) would be limited to designated routes. The BLM assumes that all visitors would adhere to the Travel Plan.
Utah 4 Wheel Drive Association	979	1	Several short sections of the Flat Iron Mesa Easter Jeep Safari (EJS) route are missing from the proposed maps. One missing section includes the popular obstacle Easter Egg Hill. Most likely this is an accidental omission, but this should be brought to the BLM's attention.	See response to comment 206-17.
Utah 4 Wheel Drive Association	979	2	On the Strike Ravine trail, the obstacle known as "Big Ugly" has been left off the maps. Additionally, the section of Strike Ravine that crosses Kiley Miller's property is also missing from the maps. RR4W has successfully defended the legality of this route in court over the last few years, and this valid route should be included to bring to the BLM's attention.	See response to 206-11.
Utah 4 Wheel Drive Association	979	3	Short sections of the Easter Jeep Safari routes for Crystal Geyser and 3D are also omitted from the BLM maps. Again, this is probably an accidental exclusion, but something to bring to the BLM's attention.	Corrections to Easter Jeep Safari routes have been made in the Travel Plan.
Utah 4 Wheel Drive Association	979	4	Coyote Canyon is a popular hardcore trail on public land west of Area BFE. This trail is not included on current proposed maps, but should be established as a designated route.	Coyote Canyon was not in the inventory of routes analyzed in the Travel Plan process (see Appendix G). For adding new routes to the Travel Plan after the signing of the Record of Decision, see response to comments 122-15 and 122-30.
Moab Friends-	1002	1	There are sections of several permitted Easter Jeep	All Easter Jeep Safari route data has been corrected. All

for-Wheelin'			Safari Trails that are left off the Travel plan maps. -Copper Ridge Trail -Strike Ravine Trail -3D Trail -Dolores Triangle Trail -Flat Iron Mesa Trail	Jeep Safari routes are in Alt. C of the Travel Plan.
Moab Friends-for-Wheelin'	1002	2	All SRMAs with a motorized focus should include direction regarding when and how additional or expanded routes/areas would be provided should there be a need.	For the addition of new routes at the conclusion of the DRMP/EIS, see response to comments 122-15 and 122-30.
Western Watersheds Project	1025	1	We note that, in particular, livestock grazing is not analyzed in a range of alterantives (DEIS/RMP Chapter 2) which include No Grazing, Significantly Reduced Grazing, and No Action. This failure must be corrected to meet the intent of NEPA and in order to provide a comparison of the impacts of livestock on riparian and upland areas, water quality, soils and wildlife under proposed stocking rates as compared to conditions in the absence of livestock. Otherwise, no true evaluation of the impacts of livestock grazing can be claimed.	The No Grazing Alternative proposed by the commentor is an alternative considered but eliminated from analysis on pg. 2-107 of the DRMP/EIS. This referenced section also covers the other concerns raised by the commentor. See response to comment 9-3.
Western Watersheds Project	1025	2	An update of the AUM forage consumption value to reflect current livestock weights was completed in 2007. This analysis is also attached as Appendix 2. It shows that the forage values BLM uses underestimate forage consumption by livestock such that taking into account the most current information on livestock weights would automatically reduce current permitted nubmers by 1/3.	Forage allocations do not require land use planning decision but are specified on a site specific allotment basis. The BLM Moab Field Office is currently evaluating each allotments using the Standards for Rangeland Health and Guidelines for Grazing Management for BLM in Utah and making adjustments in numbers and season of use, as necessary, based on these guidelines. See Appendix Q of the DRMP/EIS. See response to comment 9-3.
Western Watersheds Project	1025	3	BLM, in relying on the State of Utah to list streams in its TMDL process, is abrogating its responsibility to manage so that water quality standards are met.	The Environmental Protection Agency has delegated the responsibilty under the Clean Water Act to the State of Utah. The BLM manages the public lands so as not to exceed the State of Utah water quality standards. The State identifies waters that are not meeting water quality standards.

Western Watersheds Project	1025	4	By grazing livestock on the sensitive and erodible soils found in the RA, BLM is impairing watershed function, creating salinity problems in the Colorado River, which is in opposition to the Colorado River Salinity Control Act. This also results in the impairment of habitat for sensitive, threatened and endangered fish. It is BLM's obligation to research and provide citations and a summary of this research that clearly documents the role of livestock grazing within upland and riparian ecosystems in altering watershed function as well as water quality , and delineate what particular practices will be followed to protect water quality, including effectiveness monitoring.	The land use planning process is utilized to identify lands that are available not availble for livestock grazing. The impacts of livestock grazing on the resources mentioned by the commentor are addressed not at the land use planning level but rather when the grazing permit is renewed. Standards for Rangeland Health and Guidelines for Grazing Management are utilized to protect these resources on a case by case allotment basis. Site specific impacts resulting from livestock grazing are addressed on a site specific allotment basis for soils, riparian areas, impairment of habitat, and threatened and endangered species. See response to comment 9-3.
Western Watersheds Project	1025	5	The effects of surface disturance by livestock on soils, biological crusts and plant communities as they interact with wind must be analyzed in an appropriate model that takes into account ground cover, shrub and forest cover, erosion factor, wind patterns and speed to determine the impacts on ambient air quality and human health in nearby communities, National Parks and the region from particulate pollution. This analysis must incude consideration of all other surface disturbing activities such as recreatonal vehicles, normal traffic, oil, gas and mineral exploration, development and production activities. In addition, the relase of greenhouse gases (CO2 and CH4) and other organic or inorganic pollutants must be calculated and modeled to determine the impacts on air quality and human health in nearby communities, National Parks and the region from particulate pollution. This analysis must include consideration of all other surface disturbing activities such as recreational vehicles, normal traffic, oil gas and mineral exploration, development and production activities. In addition, the release of greenhouse gasess	See response to comment 1025-4.

			(C02 and CH4) and other organic or inorganic pollutants must be calculated and modeled to dermine the impacts on air quality (DEIS/RMP 4.3.1 and 4.3.4), climate change and global warming, wildlife (DEIS/RMP 4.3.15, 4.3.19) and human health (DEIS/RMP 4.3.4) in a like manner. Form example the report recently released by the United Nationas, Livestock's Long Shadow, shows that the greenhouse gas emissions from livestock are greater than that from transportation.	
Western Watersheds Project	1025	6	The Moab FO should conduct a capability analysis to determine the areas that might be available for livestock grazing, excluding steep slopes >30%, low forage production <200 lbs/areas, ecosystems converted by wildfire or invasive weeds, and the ability of sensitive soils to respond following impacts (arid elevations, reclamation, soil chemistry, drought). Then, in consideration of wildlife competition and recreation impacts, determine those lands that will be made available (suitable) for livestock grazing. Areas that should not be considered suitable include riparian areas, wilderness areas, wilderness study areas, ACECs, sensitive soils, crucial wildlife areas, and public campgrounds and other administrative sites. Once this is done, BLM should then apply the current forage capacity and livestock consumption rates to determine the appropriate stocking rates and incorporate management as described in Appendix 1. This analysis, which will result in significant reduced grazing, should determine the levels and management of livestock for analysis for comparison with a NO Grazing Alternative and the Status Quo, or No Action Alternative.	See response to comment 1025-4.
Western Watersheds Project	1025	7	Despite an improper capability and suitability analysis, the DEIS/RMP failed to quantify and analyze the impacts of livestock grazing with riparian/wetland areas which are critical and sensitive ecosystems within the western landscape.	See response to comment 1025-4.
Western	1025	8	The DEIS/RMP failed to analyze the role and values of	This was not an issue brought up during the scoping

Watersheds Project			predators in controlling rodent populations and fulfilling their role in a healthy ecosystem.	process and wastherefore not analyzed in the DRMP/EIS. The commentor has not provided any information or demonstated a need to conduct this level of analysis.
Western Watersheds Project	1025	9	The DEIS/RMP does not present an allotment by allotment summary of current monitoring information that describes the trend or condition as compared to the 1985 RMP. Claims of streams and riparian areas in PFC ignore that PFC is a minimal classification that does not address the wildlife habitat attributes of these most important areas, water quality or instream habitat for fish. In addition, springs, seeps and wetlands condition and trend are not described. Where is the analysis of utilization and annual stocking rates?	Monitoring of riparian areas and streams for properly functioning condition does not require a land use planning decision for livestock grazing. These resource values are addressed on a site specific allotment basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management. See response to comments 1025-4 and 9-3.
Western Watersheds Project	1025	10	The DEIS/RMP does not analyze or propose science based utilization standards for upland and riparian areas, stream bank stability standards or other critical livestock management mechanisms. It does not analyze different grazing systems and their requirements for rest to protect plants during critical growth periods. These are fundamental decisions that must be made at the planning level or BLM cannot claim it is managing in a sustainable manner that does not impair productivity as mandated by FLPMA. Neither does the absence of specific monitoring.	Utilization and stream bank stability do not require a land use planning decision for livestock grazing. These resource considerations are addressed on a site specific allotment basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management. See response to comment 1025-4 and 9-3.
Western Watersheds Project	1025	11	The Moab FO should at a minimum, analyze alternatives including No Action (status quo), No ATVs, Dirt Bikes, or Snowmobiles, or the new experimental playtoys, Personal Aerial Vehicles, and the level of use allowed in the current set of alternatives. Some of the science regarding this issue is presented in the following paragraphs.	There is no snowmobile use on BLM lands within the Moab planning area. An alternative which proposes to make the entire planning area unavailable to ATVs and dirt bikes does not meet the purpose and need for this document. NEPA requires that agencies develop appropriate alternatives to recommended portions of actions which involves unresolved conflicts. No issues or conflicts have been identified during this planning effort which requires the complete elimination of dirt bikes and ATVs within the planning area for their resolution. An alternative which proposes to make the entire planning area unavailable to dirt bikes and ATVs would be inconsistent with the National Management Strategy for

				Motorized Off-Highway Vehicle Use on Public Lands.
Western Watersheds Project	1025	12	DEIS/RMP must provide evidence that any proposed mitigation and enforcement efforts will be effective for those alternatives that allow any level of use by these machines.	On pg. 4-3 of the DRMP/EIS the assumption is made that "BLM will have the funding and workforce to implement the selected alternative".
Western Watersheds Project	1025	13	The combined effects of sediments from watershed uses such as roads, OHVs, grazing and logging, have not been addressed in a comprehensive analysis. No evaluation has been done for the contribution of hazardous pollutants to the air and watersheds where motorized vehicles are used.	See response to comment 124-7. No logging occurs on BLM lands within the Moab planning area.
Western Watersheds Project	1025	14	Road densities have not been analyzed nor have their effects on wildlife been analyzed. A recent publication by the National Park Service discussed the effects of snowmobiles on wildlife.	An analysis of habitat fragmentation due to roads is found on pgs. 4-482 through 4-486 of the DRMP/EIS.
Western Watersheds Project	1025	15	BLM has not adequately analyzed the direct, indirect, and cumulative effects of the RA's road and trail network, the large number of closed roads and trails that continue to be used illegally by ATVs and dirt bikes, and the incidence of newly created, illegal routes. There has been no analysis of road density effects. These factors were not considered in addressing wildlife impacts in the DEIS.	An analysis of habitat fragmentation due to roads is found on pgs. 4-482 through 4-486 of the DRMP/EIS. The DRMP/EIS proposes to close 2,506 miles of inventoried existing routes in the preferred alternative (Alt C). Illegal activities are not a land use planning issue but, as stated on pg. 1-11 of the DRMP/EIS, is an issue addressed through policy or administrative action.
Western Watersheds Project	1025	16	Stipulations added to mitigate various management actions proposed within the DRMP/EIS are inconsistently applied throughout the proposed alternatives. The same types and degrees of stipulations designed to mitigate mineral and oil/gas extraction and development impacts should be applied to reduce all surface distrubing impacts including livestock grazing, and motorized and non-motorized recreation. Various types of stipulations recommended include seasonal timing limitations; controlled surface use limitations on slope >30%; spatial buffers for	Stipulations developed for oil and gas leasing are applied to all surface disturbing activities. These activities are defined in Appendix C of the DRMP/EIS on pg. C-1: "Surface disturbing activities are those that normally result in more than negligible disturbance to public lands and accelerate the natural erosive process". Many examples of surface disturbing activities are provided but the following are not considered surface disturbing: livestock grazing, cross-country hiking, minimum impact filming, and vehicular travel on designated routes. Many of the activites mentioned by the commentor have not

			sensitive wildlife habitats; restrictions on uses within sensitive soils and municipal watersheds. Each of these stipulations should be consistently identified and applied in common to all proposed alternatives and to all management actions and authorizations in all applicable locations, including authorization of livestock grazing; development of grazing systems/amps; motorized vehicle routes; mechanized vehicle routes; commercial recreation permitting; recreation events; filming permits; special management designations including ACECs, and SRMAs; right of ways, road and facilities maintenance and construction; vegetation treatments; as well as oil/gas and mineral extraction.	been defined as surface disturbing in the DRMP/EIS. New motorized routes, high impact film permits, and vegetation treatments are considered surface disturbing and would managed consistent with the oil and gas leasing stipulations.
Western Watersheds Project	1025	17	Many prescriptions within the DRMP/EIS are directed only toward "surface disturbing" activities, intended to exclude activities such as livestock grazing, cross-country hiking, minimum impact filming, and vehicular travel on designated routes. However within Moab RA, the extent of impacts associated with livestock grazing, hiking by vast numbers of recreationists, filming and the degree of motorized travel on designated routes certainly meet the referenced definition in Appendix C, which states "surface disturbing activities are those that normally result in more than negligible disturbance to public and that accelerate the natural erosive process.	See response to comment 1025-16.
Western Watersheds Project	1025	18	Overall, recreation proposals in the DRMP/EIS are very confusing and hard to evaluate due to the extent of management layering of Special Management Designations (SRMAs) and Focus Areas, relative to other Special Management Designations (ACEC, WSAs, WSRs).	See response to comment 121-9 and 123-14.
Western Watersheds Project	1025	19	However, the impacts from motorized vehicle use along authorized routes are not sufficiently nor scientifically quantified and analyzed, especially with over 300% increases in OHV registration within Grand County alone since 1998 (Table 3.21).	Although the percentage increase is large the actual numbers of registered non-street legal vehicles in Grand County rose from 238 in 1998 to 726 in 2002. The impacts of vehicle use along designated routes is discussed throughout Chapter 4 of the DRMP/EIS as well as in Appendix G. The commentor provides no specific

				information about how the impacts were not sufficiently analyzed.
Western Watersheds Project	1025	20	In light of this, and since there appears to be a lack of adequate range of alternatives of management options or mitigation for environmental impacts, we support Alternative B (Environmental Preferred) prescriptions within the SRMAs with specific comments as detailed below.	This is an opinion that does not require a response.
Western Watersheds Project	1025	21	Within the recreation section, the maintenance and/or construction of new recreation facilities is not always warranted or justified to "support or enhance recreation opportunities" where existing facilities have not been properly analyzed or developed in the past (eg public health and safety with respect to flood zones, fire hazards, or environmental damage including disturbance to wildlife species.	Land use planning is a tiered process ranging from broad general allocations and management prescriptions to subsequent site-specific authorizations. Land use planning decisions do not require site specific analyses. Detailed impact analysis will be conducted for site-specific authorizations during implementation of the decisions in the RMP. This would include recreation facilities for SRMAs and Focus Areas. All existing facilities currently on the ground have been properly analyzed through the NEPA process.
Western Watersheds Project	1025	22	The proposed Tavel Plan should recommend signing travel routes as open instead of closed, therefore removal of signs would not be as costly or result in additional labor, compliance and enforcement problems.	See response to comment 206-5, 120-96, and 479-8.
Western Watersheds Project	1025	23	Motorized vehicle use as proposed within the White Sand Dune area and within 10-mile Wash does not adaquately protect the unique riparian, springs, wildlife and cultural values as initially identified within their respective ACEC proposals. Prescriptions necessary for the Protection of environmental resources within the proposed 10-mile wash ACEC should not differ between Alt B and Alt C with respect to motorized routes within the stream corridor, when special management is identified to avoid damage of identified resources. Furthermore, include with the impact analysis for special designations related to 10-mile Wash ACEC benefits to riparian/wetland resources by prohibiting motorized vehicles downstream of Dripping	See response to comments 479-6 and 124-81.

			Stream to the Green River.	
Western Watersheds Project	1025	24	Designations of identified motorized vehicle routes within the riparian/wetland streams of Kane Creek, Upper Courthouse Wash Focus Area and Labyrinth Focus Area, including proposed competitive motorized events, do not adaquately protect the stream ecologies and riparian dependent wildlife. The proposed travel routes, as well as records of non-compliance existing throughout these critical ecosystems indicate resource damage is currently occurring at alarming rates.	Non-compliance and enforcement actions are issues addressed through policy and adminstrative actions as stated on pg. 1-11 of the DRMP/EIS. In designating routes for travel, riparian issues were carefully considered. Of the 2,506 miles of existing routes that are eliminated in the Travel Plan accompanying Alt. C, many were removed because of riparian conflicts. Where the purpose and need for the route outweighed the riparian conflict, the route was designated in Alt. C such as Kane Creek. Indiscriminate cross country travel in riparian areas has been almost entirely eliminated in Alt C by limiting travel to designated routes. Competitive motorized events are directed to the Dee Pass motorized trail focus area in Alt C. The DRMP/EIS states on pg. 2-25: "Competitive routes within this area would be based on site specific NEPA analysis.
Western Watersheds Project	1025	25	How is the current capacity of authorized livestock grazing determined in the RA to aviod immediate ecological damage? How is the suitability to graze by livestock in areas such as steep slopes, sensitive soils, riparian areas, and areas with high invasive vegetation determined where even the local soil surveys published by the Natural Resource Conservation Service (NRCS) recommend them as unsuitable, limited to suitability, or suitable only for wildlife purposes?	The affects of livestock grazing on resource values such as steep slopes, sensitive soils, riparian areas, and areas with high invasive vegetation do not require a land use planning decision. These resource values are addressed on a site specific allotment basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management. See response to comment 1025-4 and 9-3.
Western Watersheds Project	1025	26	The data cited was summarized in 1985, which occurs within the highest precipitation periods recorded on the RA. Ecological conditiions have changed greatly since the 1985 estimates cited in Table 3.10. BLM Manual H-1601-1 (BLM 2005a) states that vegetation management decisions, inculding grazing, must be based on desired future conditions (DFC), usually expressed as ecological or management status of vegetation (species composition, habitat diversity, age	The resources of concern identified by the commentor related to livestock grazing do not require a land use planning decision. These resource values are addressed on a site specific allotment basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management. See response to comment 1025-4 and 9-3.

			and size classes of species) and desired soil qualities (conditions of soil cover, erosion, compaction, loss of soil productivity). DFCs and management objectives are not analyzed and documented by allotment to justify current grazing authorizations.	
Western Watersheds Project	1025	27	Rest-rotation grazing systems and/or season-of-use restrictions should be identified specifically by individual allotment to reduce ecological and user conflicts associated with current grazing authorizations. Table 3.11 indicates insufficient grazing systems are currently in place with 52 allotments being grazed season-long; and only 21 allotments containing deferred rotation grazing; and 1 allotment containing a rest-rotation grazing system.	Rest-rotation grazing systems and season of use restrictions related to livestock grazing do not require a land use planning decision. These resource values are addressed on a site specific allotment basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management. See response to comment 1025-4 and 9-3.
Western Watersheds Project	1025	28	If livestock grazing is not removed within these allotments, as proposed in some alternatives, then appropriate grazing systems and/or mitigation should be specifically identified for each and justified based on the science. A number of other allotments within the Moab RA appear to also have been recommended for rotation grazing systems within the 1985 RMP which are not currently implemented. Additional allotments have been identified to be conflicting with other resource values within respective analysis.	The BLM is reviewing each allotment and making adjustments based on Standards for Rangeland Health and Guidelines for Grazing Management. See response to comment 1025-4 and 9-3.
Western Watersheds Project	1025	29	Long-term adjustments to livestock use (term permits adjustments) require the evaluation of monitoring data including climate, actual grazing use, current or historic impacts, utilization mapping, forage capacity determinations and long-term trend data, as well as utilization levels, all of which have been apparently absent within the Moab RA during recent years.	Adjustments to livestock use is being undertaken on a site specific allotment basis using monitoring, actual grazing use, climatic data, and trend data. This is accomplished through the Standards for Rangeland Health and Guidelines for Grazing Management. See response to comment 1025-4 and 9-3.
Western Watersheds Project	1025	30	The DEIS/RMP identifies a spread of alternatives to implement range improvement projects in response to meeting Rangeland Health Standards. While these various alternatives may help prioritize implementation of recommendations resulting from Rangeland Health Standard evaluations, regulations require that	The BLM is aware of the regulations to mitigate ecological damage resulting from Rangeland Health Standard evaluations within 2 years. The BLM will comply with these regulations.

			rangeland improvements to mitigate ecological damage must be implemented within 2 years of the evaluation regardless of the equal benefits to livestock and wildlife, or livestock solely. This is not an appropriate land use planning proposal.	
Western Watersheds Project	1025	31	Alternatives identified within the soils/watershed and livestock grazing sections should be adjusted to apply use restrictions such as closure, season-of-use and rest-rotation grazing systems consistently on all high to moderately saline soils to reduce non-point surce contributions within the Colorado River basin, not just saline soils within mancos areas. Such restrictions should specify individual allotments and particular seasonal or management adjustments or closures to protect sensitive soils.	Use restrictions such as closure, season-of-use and rest-rotation grazing systems related to livestock grazing do not require a land use planning decision. The resource considerations are addressed on a site specific allotment basis utilizing Standards for Rangeland Health and Guidelines for Grazing Management. See response to comment 1025-4 and 9-3.
Western Watersheds Project	1025	32	There is no adequate spread of alternatives identified or maps provided for maintenance of existing or newly planned vegetative treatments, even though objectives and conflicts have altered since their original implementation. Such actions should undergo NEPA analysis and public review periods prior to implementation within all alternatives to ensure environmental and wildlife protection.	All new vegetative treatments would require site specific NEPA analysis, including public review periods. The DRMP/EIS gives a broad goal for these treatments, but does not define their specific locations. Existing vegetative treatments have all undergone the NEPA process at the time of their authorization. Maintenance of these treatments would only occur without new NEPA documentation if there have been no changes in condition. This means that most vegetative treatment maintenance projects would require new NEPA analysis.
Western Watersheds Project	1025	33	Consideration of habitat banking for compenstaion of wildlife habitat loss should be considered only when it involves parcels which enhance wildlife or ecological resources.	The section referred to is under Chapter 2 of the DRMP/EIS for wildlife and the habitat banking referes to wildlife.
Western Watersheds Project	1025	34	California condor have been documented in the Moab RA as far north as Flaming Gorge, as well as proposed reintroductions of grey wolves, both of which are not analyzed within the Draft RMP/EIS with respect to habitat requirements and impacts from other authorized uses.	Both of these species were released on an experimental basis. The U.S. Fish and Wildlife Service have not identified habitat requirements within the Moab Field Office.

Western Watersheds Project	1025	35	Air quality impacts from permitted motorized vehicles and recreation events such as occurring during Jeep Safari and 24 Hours of Moab events are not adequately analyzed within the Draft RMP/EIS.	Data is not available to analyze the air quality impacts of motorized vehicles during recreation events.
Western Watersheds Project	1025	36	The degree of impacts associated with mineral and oil/gas extraction and geophysical exploration with respect to cumulative motorized vehicle routes, pads, and pipelines is of concern within the RA with no specific thresholds provided to reduce protect cumulative environmental impacts.	The BLM can not discern what the commentor is stating. The commentor does not provide any specific information about where the analysis is deficient. The BLM does not set thresholds for motorized vehicle use and oil and gas development.
Western Watersheds Project	1025	37	The DRMP/EIS assumes no impact from recreation or the travel plan to livestock grazing despite the degree of loss of habitat, spread of invasive weeds, reduce ecological conditions, and competition from large numbers of recreation users, events, authorized roads, and motorcycle route.	The impacts of travel management decisions on livestock grazing are detailed in the DRMP/EIS on pgs. 4,-73, 4-76, 4-79, and 4-80. The BLM has not identified general use as an issue where recreation is a conflict with livestock grazing. For the most part, the grazing seasons and the recreation seasons to not coincide.
Western Watersheds Project	1025	38	Impacts to livestock grazing from watershed actions, need to quantify temporary or permanent decreases in acres or aums in each alternative.	There would be no temporary or permanent decrease in AUMs for livestock based on any watershed actions proposed in the alternatives for the DRMP/EIS.
Western Watersheds Project	1025	39	Significant discrepencies exist within the riparian sections and other sections referencing riparian resources within the DRMP/EIS. Large differences exist between the number of riparian acres cited within the Moab RA in the affected environment, which references the 2003 BLM riparian GIS databases as containing 32,750 acres by ecological condition and those cited in the impact analysis which relies on Gap Analysis to determine Moab RA contains 13,450 acres of riparian resources. The DRMP/EIS quantification and analysis is severly flawed and unreliable throughout the document with these discrepencies, as well as others referenced below. Additionally, discrepencies and confusion exists on the locations and numbers of acres of riparian areas removed from livestock grazing within all alternatives throughout the document. Examples follow: -Within the riparian impact analysis, whether riparian	The discrepancy in riparian data identified by the commentor has been corrected in the PRMP/FEIS. The riparian analysis in Chapter 4 of the PRMP/EIS has been changed accordingly. The BLM is not required to exclude all riparian areas from livestock grazing. Riparian areas are evaluated on an allotment specific basis during the Permit Renewal process using Standards for Rangeland Health and Guidlelines for Grazing Management. The commentor has expressed a preference for the riparian actions and ACEC designations proposed in Alt B of the DRMP/EIS. The BLM has chosen Alt C as the preferred alternative. As part of the Standards and Guidelines process for the Potash allotment, a cattle guard has been placed on the

			acres comprise either 32,750 acres or 13,450 acres, exclusion of livestock rgazing from only 17% of riparian areas, or even anything less than all of riparian acres within the district under the Alternative B Environmentally Preferred or Alt C BLM Preferred alternative is unacceptable, especially when approximately 43% of riparian areas are Functioning-at-Risk or in unsatisfactory condition and riparian areas comprise less than 1-2% of Moab RA public lands. Beneficial impacts to riparian can be realized from selection of 12 proposed special ACEC designations within Alternative B Environmental Preferred alternative. Alternative C BLM Preferred alternatives should recommend selection of more ACEC designations that benefit or protect riparian/wetland. Especially when the proposed SRMAs do not adaquately protect sensitive riparian resources which support approximately 80% of wildlife species. -Alt B Environmentally Preferred alternative of soil/water impacts analysis cites livestock grazing in 4,422 acres of riparian resources and along 58 miles of perennial stream would be excluded. Alternative C BLM Preferred would restrict grazing in 1,169 acres of riparian resources improving riparian along 28 miles of perennial stream. -Alt C BLM Preferred alternative within the wildlife impacts section cites grazing would be restricted in 1,169 acres of riparian habitat in five allotments. Restrictions would include the development of AMPs. In addition, 77 acres in Day Canyon would be unavailable for grazing. Where in contrast within the riparian impacts section 4.3.11.3.3 Alternative C, the riparian areas unavailable for grazing are cited "as the same areas as under Alternative B, with the exception of Day Canyon, Kane Springs, Lower Gray Canyon of the Green River, and Hatch Wash, which would remain available for grazing." Furthermore in the riparian	Potash road between the Potash plant and the boat ramp. This action has excluded grazing from the Potash road (Highway 279) including the access to Day Canyon. This has excluded Day Canyon from grazing. The text in the PRMP/FEIS has been changed to reflect that Day Canyon has been excluded from grazing. Specific riparian wetland resources are evaluated on a site specific allotment basis during the Permit Renewal process using Standards for Rangeland Health and Guidlelines for Grazing Management. The commentor's request for the names of specific streams and acres affected by each alternative is not necessary to analyze impacts and the land use planning level. The goal of the impact analysis is to compare the alternatives. For travel management, the number of miles excluded in order to benefit riparian resources has been added to Appendix G of the PRMP/FEIS..

			resources alternative table on page 2-31, riparian areas would only be "prioritized for evaluation within specified allotments", with Day Canyon included in both Alt B Environmentally Preferred and Alt C BLM Preferred alternatives. Rangeland Health Standards require the removal of livestock grazing impacts from sensitive riparian/wetland resources whether through season-of-use adjustments, AMP development or fencing for mitigation when issues of Properly Functioning condition are raised as specifically identified for riparian allotments including Day Canyon. Therefore, we support removal of livestock grazing from those allotments identified within Alternative B Environmentally Preferred within the riparian alternative table; those identified with conflicts within Riparian affected environment section; those identified within section 4.3.6.3.3 impacts of riparian actions on livestock grazing management; and Table 4.30 within the riparian impact analysis section although there remain discrepancies between some references. -Within the soils/watershed impact analysis, similar beneficial impacts from cultural resource proposals to 42 miles of perennial stream within Alternative B and C of soils and water section although there remain discrepencies between some references. -Within the soils/watershed impact analysis, similar beneficial impacts from cultural resource proposals to 42 miles of perennial stream within Alternaive B and C of soils and water section would be received to riparian and wildlife resources. -Within impact analysis to livestock grazing from riparian mgmt, all alternatives should cite the specific allotments and numbers of acres affected by alternative not simply that 8 or 6 sites would be excluded from livestock grazing. -Impacts to riparian/wetland resources from desiganted routes and single-track motorcycle routes need to be	

			specifically quantified and analyzed for public review especially since this was a scoping issue initially raised by the public. -Within the livestock grazing impact analysis, the number of acres cited available to livestock grazing from selection of riparian actions in Alternative B would be a reduction of 4,422 acres and 203 AUMs as compared to Alternative A.	
Moab Friends-for Wheelin'	1027	1	There are sections of several permitted Easter Jeep Safari trails that are left off the Travel Plan Maps. We understand that Ber Knight has met with the MFO regarding these omissions, and was told that they woould be corrected, but we mention them here as a reminder of their importance to us. * Copper Ridge Trail: The connection betweeen southern and northern Little Valley Roads at Klondike Bluffs Road intersection is missing. Another segment of the route, one that is used to bypass the difficult pipelinge near US 191 at UTM 4282150N 0614340E. Next there has been some discussion among CR trail leaders as to two modifications to the trail that would allow shortening it yet retaining the trail's character. These changes would require two road segments to be left in Alternative C that are eliminated from Alternative A. The first starts at UTM 4286060N 0615910E in the Sovereign area, proceeds roughly ESE, and then turns NE to connect with the pipeline road about 4286190N 0617590E. This would allow using a segment of road that passed dinosaur tracks of the way to the usual lunch spot. The second road segment is a loop that starts from the Little Valley Road at approximately 4290630N 0614020E; it startsin a SW direction, climbs the hill top, then heads NW along the ridgeline before dropping into a wash and bearing NE to reconnect back with Little Valley Road at 4291230N 0612940E. This loop provides some elevation gain and therefore produces nice veiws into Arches NP.	See response to comment 206-11.

			* Strike Ravine Trail: Two sections are missing. The N-S road crossing the private property that Red Rock 4 Wheelers had to defend its right to use in court is not shown, approximate UTM4253670N 0638440E on the southern end; a portion of the "Big Ugly" hill is not shown UTM 4254480N 0638550E. * 3D Trail: A section of road is missing from about UTM 4285900N 609900E north then west to UTM 4286400N 609300E. * Dolores Triangle Trail: An E-W shortcut near Steamboat Mesa, at about UTM 4295500N 668000E, is eliminated, and it is quite useful. * Flat Iron Mesa Trail: Four portions of this trail are not included in Alternative C. First, from UTM 4246450N 636300E jiggling NW to the pipeline road. Second, from UTM 4245600N 634700E going SW to Plan trail. Third, from UTM 4246200N 633400Egoing SW to meet the SJ County B road. Also at approximately UTM 4246440N 634910E the roads do not appear to connect, when in fact they do, and this connection is used on the Flat Iron safari trip. Last the loop around "Hammerhead Rock" from about UTM 4242400N 633400E southerly and then east to the plan route. Another note for this trail, the last bit of the permitted route to the county B road has been fenced across with no gate, and a longer existing road is now used to reach the county road. It would be helpful to update this on the official map.	
Moab Friends-for Wheelin'	1027	2	There are two road segments in existing WSA's that we believe could be reopened without impacting the suitability of the area for preservation. In one instance Search and Rescue efforts would be enhanced by this action. These routes are: * Behind the Rocks WSA: Short segment to "EggRanch Fin", a nice viewpoint. * Negro Bill Canyon WSA: The road west from Coffee Pot Rock.	See response to comment 206-20.

Moab Friends-for Wheelin'	1027	3	Some routes shown on Alternative A in red, indicating they will be kept on the system in Alternatives C and D, do not appear on Alternative C. Three examples of this are listed below. We feel this issue should be addressed and corrections made for the entire map before the plan is finalized. * Dry Mesa spurs to two overlooks, and the extension of the main road on eastern end. * Tenmile area has a road to and overlook missing. * Rainbow Roacks area has two overlook roads missing.	See response to comment 206-21.
Moab Friends-for Wheelin'	1027	4	"Coyote Canyon": We fully support the designation of the Coyote Canyon trail. The extreme rock crawling trail is just to the west of Area BFE and Kiley Miller's private property. It is a user-created trail (in an area currently designated as "open"), and is not in the BLM road inventory and Travel Plan. Extreme trails are important, as they fill a need for a growing segment of 4WD enthusiasts, and there is a shortage of extreme trails in the Moab area. In addition, extreme trails such as Coyote Canyon can help take pressure off of other difficult trails, such as Moab Rim and Pritchett Canyon.	This route is not part of the San Juan County route inventory, nor was it proposed by any member of the public during scoping. As a result, it was not evaluated in the DRMP/EIS. This route can be considered for identification on a site-specific basis in the future. See also response to comment 206-4.
Moab Friends-for Wheelin'	1027	5	(Note: This letter contains comments that are the same as letter I-200, comment numbers 10, 11, 12, and 14.)	See response to comments 200-10, 200-11, 200-12 and 200-14.
Moab Friends-for Wheelin'	1027	6	All SRMAs with a motorized focus should include direction regarding when and how additional or expanded routes/areas would be provided should there be a need.	See response to comments 122-15, 122-30 and 206-4.
Moab Friends-for Wheelin'	1027	7	SRMAs and their "focus areas" should avoid excluding other uses categorically. The Preferred Alternative clearly shows Moab BLM recognizes the importance of providing some motorized routes in non-motorized "zones." Also, visitors to specific focus areas must be made aware that other uses are still allowed in said areas, in order to avoid unwarranted conflict between varied users within the focus area. This is especially important where heavy multiple use is present on trails	The DRMP/EIS specifically states on page 4-192 that focus areas will continue to be available for recreation uses by others than whose needs are specifically addressed by these focus areas. Management plans will be developed for each SRMA and its attendant focus areas. These plans are an implementation level decision, but could include language regarding visitor education of the type the commentor suggests. Visitor education does not require a land use plan decision.

			or roads within designated focus areas.	
Moab Friends-for Wheelin'	1027	8	We support the proposal made by Ride with Respect to provide a Rockcrawling Focus Area and a Motorcycle Trails Riding Focus Area in the Black Ridge area east of Area BFE, as well as nearby equestrian and mountain bike focus areas. Rockcrawling and trails focus areas would fufill a need that is neglected under the Draft Plan, and would help reduce conflict on other challenging trails, such as Pritchett Canyon and Moab Rim. These proposed focus areas would compliment Area BFE, by providing more opportunities and thus more incentive to visit. We support the idea of designated trails in a rockcrawling focus area, as long as new trails could be legally created through cooperation between BLM and local 4-wheel drive clubs. (While the route inventory provided by Ride with Respect shows numerous roads and trails, the vast majority are not suitable foe true rockcrawling. However, there are definete possibilities for creating challenging routes.)	See responses to comments 206-3 and 206-4.
Moab Friends-for Wheelin'	1027	9	The Utah Rims SRMA is necessary to properly manage this popular area. It should have a motorized and mountain bike focus, and include the ability to desifnate or construct routes should they be needed in the future. In addition, additional camping areas should be provided.	The BLM agrees with the commentor's comment on this SRMA, and has included this SRMA in Alternatives B and C. See also response to comment 206-4.
Moab Friends-for Wheelin'	1027	10	The Utah Rims SRMA should extend further southwest to encompass Mel's Loop and beyond. Increased visitation there warrants the more active management of a SRMA. This larger area would also provide enough room for a full-day's motorcycle ride, and the establishment of a mountain bike focus area.	See response to comment 206-3.
Moab Friends-for Wheelin'	1027	11	The Dee Pass SRMA proposes to designate most of the motorcycle single-track in the area. However, ATV trails still need to be included, especially between White Wash and Red Wash.	The BLM has clarified its discussion in Chapter 4 and related maps to indicate which trails are also available to ATV use.

Moab Friends-for Wheelin'	1027	12	(Note: This letter has a map attached.)	NRR
Capital Trail Vehicle Association	1031	1	There is nothing radically wrong with the existing condition except that it does not meet all of the needs of motorized recreationists, does not provide equal opportunity, and does not adequately address the growing need of motorized recreationists. The evaluation and proposal must adequately address these issues and the predisposition to motorized closures must be avoided.	The DRMP/EIS identifies 6,199 miles of inventoried routes in Alt A; 2,871 miles of inventoried routes are excluded from any of the action alternatives because there was no purpose and need for these routes. Alt C designates 3,693 miles of full-sized vehicle routes and 282 miles of motorized single track. Alt D includes 3,855 miles of full-sized vehicle routes and 340 miles of motorized single track. Therefore, Alt D provides more motorized opportunities than does Alt C. The commentor's implication that all the action alternatives represent a loss in motorized recreation opportunities (when compared with the No Action alternative) is incorrect. Although 2,871 miles of inventoried routes were eliminated between the No Action and the action alternatives, these routes were determined to have no purpose and need primarily because they were redundant and received virtually no use. The comment assumes that the motorized recreation opportunities in the action alternatives are inadequate to meet current or anticipated future demand. The BLM in Chapter 4 discloes that all the action alternatives reduce motorized recreation opportunities. NEPA and CEQ require that BLM provide a reasonable range of alternatives in the DRMP/EIS, and the BLM asserts that it has done so. As described in Appendix G, the BLM's travel plan formulation attempts to balance transportation needs (including motorized recreation) with other resource uses and protections. The BLM must manage for multiple uses, of which motorized recreation is only one.
Capital Trail Vehicle Association	1031	2	A motorized travel plan is a plan that specifically designates roads, trails and areas for motorized use, designates which vehicles will be allowed on which	The Travel Plan accompanying Alt. C in the DRMP/EIS designates routes for motorized use, as required by law and policy. The majority of these routes accommodate

			routes and if seasonal restrictions apply. A comprehensive trail designation plan does the same thing except it includes all trail users, including mountain bike, equestrian and hiking. This is a very important distinction because the anti-access groups will attempt to convince the planning team to develop a "comprehensive" travel plan by using the existing inventory of motorized routes. They do this by identify existing motorized trails that are good for mountain bikes, equestrians, and for bird watching... or whatever. The current approach is inequitable because it takes the current motorized route inventory and tries to make it the route inventory for all users. It leaves out possibilities for constructing or otherwise developing non-motorized trails and ignores existing non-motorized trails that exist in both the planning area and adjacent lands. Now, that doesn't mean the agency can't take into consideration the effect each alterative will have on non-motorized visitors. It can- and it should be part of the NEPA analysis. But that is totally different from specifically providing a non-motorized trail system via the existing inventory of motorized routes. We support the creation, designation and management of non-motorized trails, but not at the expense of motorized visitors. We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.	any type of motorized vehicles, although some of the routes are designated specifically for dirt bike or ATV/dirt bike use only. The DRMP/EIS also designates routes for mountain bike use; in addition, mountain bikes may use all routes designated for motorized travel. Although some trails are specifically designated for hikers and equestrians, these users are not limited to a designated route system. Therefore, the number of routes designated for non-motorized use is not as extensive as that designated for motorized use and mountain bike use, as these uses are limited to designated routes by law and policy. The majority of the non-motorized routes designated in the DRMP/EIS, (e.g., Fisher Towers, Porcupine Rim Singletrack, Hidden Valley, and Corona Arch) are not and have never been motorized vehicle routes. New trails for non-motorized users can be developed after the completion of the PRMP/FEIS. Although these trails may utilize routes that were not designated for motorized vehicle use, non-motorized users may also suggest entirely new routes. All such proposals would be analyzed using site-specific NEPA analysis. For information regarding the addition of new motorized routes to the Travel Plan (after completion of the RMP), see response to comments 122-15 and 122-30.
Capital Trail Vehicle Association	1031	3	The project has a critical flaw which is the lack of a true "pro-recreation" alternative that adequately address motorized recreation. All of the alternatives developed for consideration represent the current opportunity. Conversely, virtually every project has developed a "preservation" alterative, where a maximum amount of closures are considered. The increasing demand for OHV recreation opportunities on public lands is	The Moab BLM is very aware of the need to provide for motorized recreation opportunities in the planning area. The BLM acknowledges that there are fewer miles of route in any of the action alternatives than in the No Action alternative. However, the reduction in route miles was largely accomplished by not designating seldom-- or never- used old minerals extraction routes, seismic lines, and pack trails (which never were used for 4WD use, but

			extensively documented. Therefore, it is incumbent upon the project team to formulate at least one alternative that maximizes motorized recreation, or at least does not reduce motorized recreational opportunities in the planning area. Therefore, we request that the project team formulate a wide range of alternatives including at least one Alternative that maximizes motorized recreational opportunity in the project area and addresses the following: **The project team must formulate a least one alternative that emphasizes OHV use in Roaded Natural and Semi-Primitive Motorized opportunity settings for recreation. **The pro-recreation alternative should strive to provide for the current and future demand for OHV recreational routes. **Alternatives should include areas where OHV trails can be constructed and maintained when demand increases. **Where appropriate, the agency should use this process to analyze the impacts of any future route construction and include those in the decision. **Direction for the required process to construct new routes should be incorporated into each alternative. **At least one alternative should maximize the ability to construct new sustainable trails to meet the current and future need. **The project team should develop management alternatives that allow for proactive OHV management. **All alternatives should include specific provisions to mark, map, and maintain designated roads trails and areas in cooperation with OHV users. **All alternatives should include direction to engage in cooperative management with OHV groups and individuals.	were rather artifacts of the U.S.G.S mapping system). The needs of motorized users were maintained throughout the Travel Planning process. Any routes that were in guidebooks, were utilized by special recreation permittees (such as the Jeep Safari) and/or were regularly used by motorized recreationists were assumed to have a purpose and need. Very few of these routes were not designated in the Travel Plan accompanying the DRMP/EIS. For instance, every mile of the 633 mile Jeep Safari route system is designated in Alt. C. The primary purpose and need for the great majority of the total system of routes designated in Alt C was, in fact, motorized recreation. The great majority of these routes has no other purpose or need except for motorized recreationists to tour the backcountry. Alt D designates the maximum miles of routes for motorized recreation. In addition, the Moab RMP planning team considered the needs of singletrack dirt bike users. A dirt bike route system has been designated as part of Alts. C and D in the Travel Plan. The dirt bike route system developed as part of the DRMP/EIS is extensive. It has no use other than motorized recreation. Both Alts C and Alt D emphasize motorized recreation, although Alt. D emphasizes it slightly more. Focus Areas and Special Recreation Management Areas (SRMA) have been formulated and proposed solely for motorized recreationists in both Alts C and D. For instance, the Dee Pass Motorized Trail Focus Area, the Cameo Cliffs (ATV) Special Recreation Area, the Utah Rims (dirt bike emphasis) SRMA, and the Gemini Bridges Motorized Backcountry Touring Area are all proposed in Alt. C. Both the preferred and the commodity alternatives (C and D) provide for current and future OHV recreation. The

				motorized focus areas and motorized SRMAs are areas where OHV routes can be constructed and maintained if demand increases. New routes can be added to the Travel Plan on a site-specific basis using the NEPA process. This is specifically provided for in the Travel Plan decisions. See response to comments 122-15 and 122-30 for more information on adding new routes. The Travel Plan (Appendix G) details the basic outline of an implementation plan, including the provision to mark, map and maintain routes. Cooperation with user groups is an administrative action and does not require a land use planning decision. See chapter 1 (p. 1-11) of the DRMP/EIS for a statement regarding volunteer coordination.
Capital Trail Vehicle Association	1031	4	One of the specific requirements under NEPA is that an agency must consider the effects of the proposed action in the context of all relevant circumstances, such that where "several actions have a cumulative... environmental effect, this consequence must be considered in an EIS." Neighbors of Cuddy Mountain v. U.S. Forest Serv., 137 F.3d 1372, 1378 (9th Cir. 1998) (quoting City of Tenakee Springs v. Clough, 915 F.2d 1308, 1312 (9th Cir. 1990)) A cumulative effect is "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions." 18 40 C.F.R. § 1508.7. The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed. Ignoring cumulative effect allows the agency to continue to close motorized routes unchecked because the facts are not on the table. CEQ guidance on cumulative effects was developed to prevent just this sort of blatant misuse of NEPA.	The effects of the cumulative impacts of restricting travel are disclosed in the DRMP/EIS. This disclosure is stated on pg. 4-510 of the DRMP/EIS: “Cumulative impacts to transportation and access would occur primarily from actions that facilitate, restrict or preclude motorized access. Management actions that restrict OHV use would limit the degree of travel opportunities and the ability to access certain portions of the planning area.” The title of this section is “Cumulative Impacts: Travel Management.” The BLM contends that it has disclosed the cumulative impacts to travel management from the management actions proposed in the DRMP/EIS.
Capital Trail Vehicle	1031	5	The site specific analysis of each road or trail to be closed must address or identify where the public would	The routes not designated in the Travel Plan accompanying the DRMP/EIS are, for the most part,

Association			go to replace the motorized resource proposed for closure. In other words, the analysis must adequately evaluate the site specific value of a road or trail proposed for closure to motorized recreationists. It must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing. An incomplete analysis is not acceptable under NEPA requirements.	routes that have never been used by motorized recreationists. Many of them are old seismic lines, pack trails never open to motorized use and unused mining routes. No purpose or need could be discerned by the travel planning team (which included representatives from both Grand and San Juan counties) for the majority of the routes not designated in the Travel Plan. See response to comment 124-71, as well as Appendix G, for an explanation of the Travel Planning process. The impacts of route closures to motorized recreation opportunities are disclosed in Chapter 4 of the DRMP/EIS on pg. 4-408 through pg. 4-411. The BLM contends that the quality of motorized recreation experiences has not been reduced. See also response to comment 208-2.
Capital Trail Vehicle Association	1031	6	The action must develop a preferred alternative that mitigates the significant impacts on the public from the loss of motorized access and motorized recreational opportunities from the proposed action and the combined cumulative effect of all other actions in the State.	The majority of the routes not designated in the Travel Plan accompanying the Moab RMP (Alt C) are, for the most part, routes that have never been utilized by recreational motorized users. Grand and San Juan counties were part of the Travel Planning team; the representatives of these counties ascertained that motorized access was being preserved in the development of the Travel Plan. The major routes used by recreationists have been designated, including all Jeep Safari routes, routes highlighted in guidebooks and on commercially-available maps, routes utilized by guided driving outfitters, over 250 miles of motorcycle route route and other heavily used motorized routes. There is no significant impact on motorized users as a result of the actions taken in the Travel Plan. Those impacts on motorized users that are present are disclosed in Chapter 4 under direct, indirect and cumulative impacts.
Capital Trail	1031	7	Note that some new construction may be required to	The Travel Management section specifically allows for the

Vehicle Association			accomplish a reasonable system of loops. Therefore, new construction must be included in the scope of the project.	addition of new routes after the Travel Plan is completed. See response to comments 122-15 and 122-30 for a description of this process.
Capital Trail Vehicle Association	1031	8	The existing level of motorized access and recreation must not be dismissed without adequate consideration because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is reasonable alternative and alternative other than No Action must be built around it. This reasonable alternative should also include mitigation to protect the natural environment and compensate motorized recreationists for the significant cumulative effect of past losses, and enhancement to adequately address the growing need for motorized access and recreation	Recreational opportunities and motorized access have not been significantly decreased between the No Action alternative and Alt. C (the preferred). The major routes used by recreationists have been designated, including all Jeep Safari routes, routes highlighted in guidebooks and on commercially-available maps, routes utilized by guided driving outfitters, over 250 miles of motorcycle route and other heavily used motorized routes. There is no significant impact on motorized users as a result of the actions taken in the Travel Plan. See also response to comment 208-2.
Capital Trail Vehicle Association	1031	9	A sense of magnitude must be used when making decisions about road closures based on indicators such as sediment production. For example, a route should not be closed because it is estimated to produce 10 cubic yards less sediment. The sediment yield must be compared to naturally occurring conditions which includes fires. Recent fires in the Sequoia National Forest discharged thousands of cubic yards of sediment to area streams which is more than all of the motorized routes in the project areas for the next 100 years.	Each of 33,000 route segments was individually assessed in the Travel Plan formulation. Purpose and need for the route was weighed against resource conflicts that may have occurred with the route. Appendix G details the Travel Plan process. Resource conflicts included riparian, cultural, wildlife, recreation, soils and wilderness. A balance was struck between the purpose and need and the conflict. Routes with conflicts were designated when the purpose and need outweighed the resource conflict. Thus, an indicator alone was not sufficient to not designate a road. See also response to 124-71.
Capital Trail Vehicle Association	1031	10	Lack of Reasonable Alternatives * The fact that comments are needed on Alternatives for the RMP and the Alternatives for the Travel Plan is not made clear in the document. * The difference between an RMP (general guidance) and the Travel Plan (implementation decisions) is not clearly described in the DEIS. The FEIS should clearly	The Travel Plan is part of the RMP; maps were included of the proposed designated routes so that specific comments could be made on the Travel Plan. The alternative number of miles of route were listed under Travel Management decisions (pg. 2-48 of the DRMP/EIS), and the map accompanying those decisions was referenced. Implementation decisions have been clearly delineated in

			articulate the difference. * None of the Alternatives presented are acceptable as they stand, including the Preferred Alternative C, which mandates unworkable and impractical management of camping and motorized travel. In addition, in all of the Alternatives, management for the White Wash Sand Dunes is fatally flawed and must be reconsidered (see comment below). *Alternative D fails to provide a true motorized focus.	the PRMP/FEIS. The Travel Plan is an implementation decision. The BLM designates areas as “open”, “closed” or “limited to designated routes”. The Travel Plan delineates which routes have been designated within that latter category. BLM national and Utah policy requires field offices to disclose the routes to be designated, if possible, during the RMP process. See also response to comments 123-1 and 123-5. The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified. For management of White Wash Sand Dunes, see response to comments 120-83, 123-35 and 123-10. The land use plan allocates resources among uses. Motorized recreation is but one use of public lands. Alt. D is the alternative that is most weighed towards the needs of motorized recreationists. Alt D puts less emphasis on protection of resources, and more emphasis on uses of the public lands. The commentor’s disapproval of any of the four alternatives is noted.
Capital Trail Vehicle Association	1031	11	BLM's open area in Alternative C and D must be expanded. The current proposal is unworkable because it confines a huge amount of vehicle use into a very	See response to comments 120-83, and 123-35.

			small area and the area's boundaries are not well defined and cannot be easily identified on the ground.	
Capital Trail Vehicle Association	1031	12	Similar Stats needed for the Moab RMP and DEIS. Commentor presents stats for a Forest Service area that reports total number of forest/motorized visitors versus the total number of wilderness visits. Uses this as an argument for more mutiple use and motorized access because the total number of forest visitors/motorized users is much higher (64%) than wilderness users. (36%). Statistics are from the Social Assessment of the Beaverhead-Deerlodge National Forest, a national survey on Recreation titled Outdoor Recreation Participation, and the Southern Research Station's report Off-Highway Vehicle Recreation in the US.	This comment does not apply to the Moab DRMP/EIS. The Moab BLM does not have comparable statistics to those quoted from the “Social Assessment of the Beaverhead-Deerlodge National Forest”.
Capital Trail Vehicle Association	1031	13	Note: Simililar Statistics Needed for the Moab DRMP and DEIS. Provided as an example. Commentor provides FS stats on high rate of wilderness designation (24%) while no more than 2.55 % of visitors are wilderness visitors. Reiterates points above in comment #12.	This comment does not apply to the Moab DRMP/EIS. The Moab BLM does not have comparable statistics to those quoted from the “Social Assessment of the Beaverhead-Deerlodge National Forest”.
Capital Trail Vehicle Association	1031	14	The number of NEPA actions at any moment that we would have to evaluate and comment on in order to be involved would total 150 to 180. Recently the route designation process has added considerably to the effort required. It it simply impossible for the public to comment on every road, trail, and NEPA document. The 300 page draft environmental document is just too much for the general public to understand and participate in. The size of the environmental document is being used as a mechanism to overwhelm the public and allow the agency to effectively ignore the needs of the public for motorized access and motorized recreation.	The Moab RMP/EIS represents one NEPA action. See response to comment 124-1 for a similar request for more time to comment. The BLM acknowledges that planning is a complex process. See response to comment 123-14. The size of the document is not meant to overwhelm the public, but rather to fully disclose the impacts of each resource on every other resource. The BLM manages twenty programs, including Recreation, Travel, Paleontology, Air Quality, Lands and Realty, Minerals, Grazing, Cultural Resources, Wildlife, Special Status Species, Special Designations, Watersheds and Soils,

				Riparian Resources, etc. To disclose the impacts of each program on every other program necessarily involves much analysis. The needs of the public for motorized access and motorized recreation is but one use of the public lands that is managed by the BLM.
Capital Trail Vehicle Association	1031	15	All planning projects should disclose the added benefit to non-motorized recreational resources resulting from the closure of roads by adding the miles of closed roads to the miles of existing non-motorized trails. Additionally, we request that the cumulative negative impact on motorized recreationists resulting from this lack of adequate accounting be evaluated and adequately mitigated	The non-designated routes are discussed under Travel Management (pg. 2-48 of the DRMP/EIS) as being available for non-motorized users to develop into non-motorized trails. However, these routes would need to be analyzed using a NEPA process for bicycles. (Horses and hikers are not restricted to designated trails, and so they could go on these non-designated routes immediately). The cumulative impacts to motorized users of non-designation of routes is discussed under Cumulative Impacts in Chapter 4 (pg. 4-510 of the DRMP/EIS).
Capital Trail Vehicle Association	1031	16	The different management plans being developed by the BLM and Forest Service are using generated, estimated and inadequate data to forward an agenda of eliminating access and motorized recreation from public lands. Economic models such as Implan should not be used when the input data is estimated and not factual or actual. Adequate effort must be exercised by the agencies to gather true and the ground data from businesses and individuals that use our public lands.	The Moab BLM, during the scoping period for the RMP, asked the public to submit route and trail inventory for possible consideration to the Travel Plan. This process is outlined in Appendix G of the DRMP/EIS. Motorized users were invited to submit data to the planning process. These data were then verified by the BLM staff on the ground. There is no economic statement in the Moab DRMP/EIS regarding the topic suggested by the commentor. Implan (an economic modeling system) was not used in the preparation of the Moab DRMP/EIS.
Capital Trail Vehicle Association	1031	17	Existing single-track trails or potential single-track trails were not adequately identified and included in the project. There are many single-track "cow" trails that motorcylce trail riders could use in the project area.	Cow trails are not, in and of themselves, motorcycle routes. The BLM invited the public to submit singletrack routes during the scoping process (see Appendix G for a description). All singletrack routes that were submitted by the public underwent a verification process. BLM staff

				visited the proposed route. Those that had established "on the ground" were verified as being existing routes. All of these existing routes were analyzed in the Travel Plan process. Their purpose and need was assumed to be recreational fun, and their designation was weighed against resource conflicts. Some, such as the route above Duma Point and the Hidden Canyon Rim had resource conflicts severe enough to outweigh their purpose and need. (The conflict at Duma Point was bighorn sheep, and the conflict at Hidden Canyon Rim was an abundance of cultural sites). The BLM stands by its efforts to designate a single track motorcycle route system.
Capital Trail Vehicle Association	1031	18	The document and decision must clearly disclose on maps and tables and summaries all existing areas, and existing roads and trails that would be closed to motorized access and motorized recreationists. Summaries should include overall closures percentages. Otherwise public disclosure has not been adequately provided and the public will not be informed and the public including motorized recreationist will not be able to adequately participate and comment.	The routes that are not to be designated in any of the action alternatives are shown on Map 2-11-A. This map shows all existing routes in the No Action alternative. The exact number of miles of route to be designated in each of the alternatives is clearly shown under each alternative on pg. 2-48 of the DRMP/EIS. Although the BLM has not calculated percentages, the public is free to do so. Tables of designated routes are also shown in Appendix G, by county and by alternative.
Capital Trail Vehicle Association	1031	19	We request that the analysis include an adequate benefit-cost analysis of non-motorized versus motorrzed trail use. This analysis should include the annual cost of the non-motorized trails per the actual and documented number of non-motorized trail user The economic analysis should also compare the annual benefit-cost per non-motorized user versus the annual benefit-cost per motorized user if the trails and funding were used as multiple-use/motorized trails.	The BLM has no data which could be used to undertake the analysis suggested by the commentor. The BLM's anecdotal assertion is that cost of route maintenance does not differ appreciably by motorized or non-motorized use. There are many more miles of motorized route (3700 miles of motorized route versus approximately 50 miles of hiking, 50 miles of equestrian and 25 miles of bike-only routes). The BLM spends more time and effort maintaining motorized routes, although the cost per mile is not known. The issue that the commentor discusses is not a land use planning issue.