

**Public Comments and Responses
- Price Draft RMP/EIS WC Supplement -
September 2007
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General Comment Responses

General Comment Response #	General Comment Summary	General Comment Response
1	The socioeconomic analysis contained in the Draft RMP/EIS and the Wilderness Characteristics Supplement do not sufficiently identify the economic impacts. Specifically, the analysis lacks a description of the economic impact from closing non-WSA lands with wilderness characteristics to oil and gas leasing, or the effect that closing these areas would have on SITLA managed lands. The analysis also does not capture recent research completed within the area.	The analyses contained in the Price Draft RMP/EIS and the non-WSA lands with Wilderness Characteristics Supplement to the Draft RMP/EIS has been modified in the Proposed RMP/Final EIS improving the direct and cumulative impacts analysis for minerals and socioeconomics. Specifically, the following revisions were made: 1) an analysis of the impacts to SITLA lands; 2) an analysis of the impacts on the amount of recoverable oil and gas resources under Alternative E and loss of revenue; and 3) a more specific analysis of the economic impacts of Alternative E, using IMPLAN modeling. In addition, information from the University of Utah Bureau of Economic and Business Research's report, "The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry - Phase II - Carbon and Emery Counties" was included in the analysis, as appropriate.
2	Managing Non-WSA Lands for so-called wilderness characteristics violates FLPMA. The BLM does not have the authority for management of lands solely because of wilderness characteristics.	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

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		<p>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.</p> <p>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.</p> <p>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.”</p> <p>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.</p>
3	<p>Commentor questions the appropriate identification of non-WSA lands with wilderness characteristics. Commentor may maintain that many wilderness quality lands have yet to be appropriately identified as possessing wilderness characteristics by the BLM. Commentor may assert that 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). The commentor may contend that BLM has only performed a cursory assessment of these wilderness character units. Commentor may also generally question the accuracy of the BLM’s inventory process in identifying intrusions within the areas inventoried as non-WSA lands with wilderness characteristics.</p>	<p>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 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 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.</p> <p>The BLM examined about 1,094,030 acres of lands for the existence of wilderness characteristics, including all lands within the Red Rock Wilderness Act. The BLM found that 937,440 acres of these lands contained wilderness characteristics and are proposed for protective management in Alternative E. The remaining 156,590 acres did not have wilderness characteristics based on the inventory maintenance conducted by the BLM between 1996 and 2007.</p>

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4	Commentor questions the BLM's ability to close an area to oil and gas leasing that is greater than 5,000 acres without complying with FLPMA language that requires disclosure of planned withdrawals of more than 5,000 in Section 204 of FLPMA.	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.
5	The document fails to explain that an alternative that proposes management decisions that exclude a principal or major use from more than 100,000 acres must result in a report to Congress, pursuant to Section 202 of FLPMA.	As required by FLPMA Section 202 (E)(2), the BLM would report to the Secretary to the House of Representatives and the Senate "any management decision or action pursuant to a management decision that excludes (that is, totally eliminates) one or more of the principal or major uses for two or more years with respect to a tract of land of one hundred thousand acres." When the Final RMP/ROD is completed, the BLM will arrange to report any contiguous tracts of land of 100,000 or greater where one or more of the principal or major uses are excluded, if any exist in the final decision.
6	The Draft RMP/EIS and its Supplement does not explain how areas with proposed restrictive management, such as ACECs or non-WSA lands with wilderness characteristics, will accommodate valid, existing rights (VER).	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.
7	Commentor recognizes BLM prepared the an additional alternative for consideration in the revision of the Price Resource Management Plan (RMP) due to the US District Court's decision. However, while BLM was required to review the wilderness values of non-wilderness lands, the court did not require BLM to develop an alternative that would essentially eliminate all multiple uses of public lands in the PFO.	In the U.S. District Court decision for SUWA v. Norton, Judge Kimball wrote that the BLM "violated NEPA by issuing...leases...without taking a hard look at the no-leasing alternative and by failing to consider significant new information about wilderness values and characteristics..." Because of this decision, the range of reasonable alternatives to be considered while developing the Price RMP and associated NEPA documentation expanded to include a no-leasing alternative of all non-WSA lands with wilderness characteristics. This required updating the BLM's inventory of non-WSA lands with wilderness characteristics, which was completed in 2007. In preparing an alternative to respond to the Court's decision, other land use decision were adjusted to ensure consistency within the alternative. This resulted in Alternative E of the Wilderness Characteristics Supplement to the Draft RMP/EIS.
8	Commentor claims that the BLM should recognize or ignore claims to RS 2477 rights of way.	The Draft RMP/EIS noted in the planning criteria in Chapter 1 that the RS 2477 issue is beyond the scope of this planning effort. Additionally, Chapter 2 states that "this RMP will not address RS-2477 right-of-way assertions. Such assertions will be settled administratively on a case-by-case basis or as confirmed through other legal means." 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.
9	Commentor is concerned with the level of detail, technical	The RFD was changed from wells in the Draft RMP/EIS to well pads in Appendix M of the

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	support, and accuracy of the RFD. Commentor encourages the BLM to work with industry to identify a more accurate RFD given the changes in the price of oil, as well as to include more information in the RFD that is required by BLM policy.	Proposed RMP/Final EIS. This allows for multiple wells per location. This is not a significant change because the acres disturbed per well in the Draft and the acres per well location in the Proposed are the same. Therefore, there is no change in the total short-term and long-term acre disturbance between the Draft and the Final. Because of increased interest in oil/gas leasing in the PFO the RFD for the Proposed RMP was changed in the Proposed RMP/Final EIS to be the same as the RFD for Alternative A in the Draft RMP/EIS. This change is within the range of alternatives.
10	BLM has ignored the findings of EPCA Phase II which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	BLM has modified Chapter 4 of the Proposed RMP/Final EIS to improve the EPCA analysis by addressing the impacts from leasing restrictions and to address the potential loss of oil and gas resources due to these restrictions. In addition, the analysis includes the impacts of restrictions on the drilling season. The restrictions of the Proposed RMP will become stipulations for future leasing (see Appendix G).
11	By a 2006 Directive from the BLM Director, the BLM cannot effect a de facto closure of thousands of acres of public lands to oil and gas leasing without following FLPMA's Section 204 withdrawal procedures: "Except for Congressional withdrawals, public lands shall remain open and available for mineral exploration and development unless withdrawal or other administrative actions are clearly justified in the national interest in accordance with the Department of the Interior Land Withdrawal Manual 603 DM 1, and the BLM regulations at 43 C.F.R. 2310." BLM Energy and Non-Energy Mineral Policy (April 21, 2006). The BLM formally adopted this policy through IM 2006-197. Consequently, the 2006 Energy and Non-Energy Mineral Policy with which the BLM must comply, conditions the closure of lands available to mineral exploration and development on FLPMA's withdrawal procedures.	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.
12	The BLM should designate lands with wilderness qualities as ACECs. - OR - The use of the ACEC designation is not appropriate to preserve Non-WSA lands with wilderness characteristics.	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. To be considered as a potential ACEC, an area must meet the criteria or relevance and importance, which does not include wilderness characteristics. Where ACEC values and wilderness characteristics coincide, the special management actions associated with an ACEC, if designated, may also protect "wilderness characteristics" (Washington Office Instruction Memorandum 2003-275). However, BLM policy directs that "an ACEC designation will not be used as a substitute for wilderness suitability recommendations" (BLM Manual 1613).
13	Commentor feels that the Wilderness Characteristics as	As part of BLM's wilderness characteristics inventory maintenance for the Lost Springs Wash and

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	described in Alternative E are not substantiated, specifically the Chimney Rock area (Lost Springs WC and the Never Sweat WC), San Rafael Reef WC, Molen Reef WC and Eagle Canyon WC. For example, the Never Sweat and Lost Springs proposed WCs contain the Chimney Rock Motorcycle Trail System. This trail system has been permitted by the BLM for off road competition events for over 25 years.	Never Sweat Wash areas, BLM performed a combination of data and on-site reviews. This review took into consideration SRP's for motorcycle events, the rail road line, OHV trails shown on Draft RMP/EIS map 2-54, Chimney rock trail system, O/G leases shown on Supplement map 3-23, and gravel potential shown Supplement map 2-65. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process. The BLM is confident of high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
14	Please disclose the difference in management prescriptions between "non WSA lands with wilderness characteristics" and WSAs in the FEIS	In the Proposed RMP/Final EIS, management for non-WSA lands with wilderness characteristics is disclosed in Chapter 2, sections 2.3.1, 2.3.3, and 2.4 under the headers/table for non-WSA lands with wilderness characteristics. Management for WSAs is also disclosed in Chapter 2, in section 2.3.3 (Special Designations). The other significant difference in management was clarified by Utah District Court Judge Benson (Case No. 296-CV-0870), which is that "a WSA, once established, cannot be revised; it becomes, in effect, defacto wilderness until Congress acts, whereas under section 202, the land will be subject to possible changes in management plans."
15	To account for sensory intrusions upon wilderness characteristic values, BLM should impose a 1 to 1.5 mile radius buffer zone from human imprints, such as roads, wells, OHV trails or pipelines, and exclude areas within these buffer zones from being managed as wilderness characteristic areas.	A required set-back from developed areas is not required to meet the naturalness criteria associated with the non-WSA lands with wilderness characteristics review. In designating other wilderness areas throughout the country, Congress has not required a set-back from busy roads and man-made structures to ensure that sights and sounds are not present from the moment a user steps into the area. Requiring such a standard for non-WSA lands with wilderness characteristics would result in a higher standard than that implemented by Congress for many designated wilderness areas.
16	The Never Sweat and Lost Springs proposed WCs contain the Chimney Rock Motorcycle Trail System that needs to be recognized and DESIGNATED. This trail system has been permitted by the BLM for off road competition events for over 25 years.	The routes in the Chimney Rock area are closed under Alternative E to align with managing the area for its wilderness characteristics. In other alternatives, these trails are left open. This ensures the Draft RMP/EIS provides the decisionmaker a range of alternatives from which to develop the Proposed RMP and eventually the Final RMP/ROD.

Organizations' Comments and Responses

Category	Organization	Comment	Response
ACEC	Bill Barrett Corporation	ACEC designations cannot be used to create de facto wilderness areas. Many of the proposed ACECs are overbroad, and appear to cover solely wilderness characteristics. BLM has not identified other nationally significant resources and values within these ACECs. Rather, the resources identified are common throughout Utah and the Intermountain West. BBC urges BLM to scale back the size and scope of ACECs that lack nationally significant resources and appear only to seek to	Please see general comment response # 12

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		create de facto wilderness areas.	
ACEC	Fidelity Exploration and Production Co.	Although some of the relevant and important values exhibited by a particular ACEC may also display as aspects of characteristics of wilderness, they are not inherently identical. The application of the management guidance for wilderness characteristics areas evaluated under Alternative E to ACECs may unnecessarily restrict access or development which causes no impairment to the applicable relevant values ascribed to ACECs.	Please see general comment response # 12
ACEC	Independent Petroleum Association of Mountain States (IPAMS)	Many of the proposed ACECs are overbroad, and appear to cover solely wilderness characteristics. BLM has not identified other nationally significant resources and values within these ACECs. Rather, the resources identified are common throughout Utah and the Intermountain West. Wilderness characteristics standing alone do not provide the BLM with basis to designate an ACEC.	Please see general comment response # 12
ACEC	Questar Exploration & Production Company	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 justification that the fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, or threatened criteria have been met.	The analyses in the Draft RMP/EIS and its supplements have been revised to identify impacts to each ACEC's R&I values, by alternative. For most ACECs, this includes the absence of a designation to determine if management without an ACEC designation can provide sufficient protection to R&I values. Additionally, the ACEC appendix has been revised to include additional information regarding the BLM ACEC review process.
ACEC	Questar Exploration & Production Company	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 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 management practices or existing designations, the new ACEC designations would disregard FLPMA.	The analyses in the Draft RMP/EIS and its supplements have been revised to identify impacts to each ACEC's R&I values, by alternative. For most ACECs, this includes the absence of a designation to determine if management without an ACEC designation can provide sufficient protection to R&I values. Additionally, the ACEC appendix has been revised to include additional information regarding the BLM ACEC review process.
ACEC	The Wilderness Society	The BLM has identified these 23 ACECs as meeting its criteria for possessing relevant and important values, which need special management to prevent their destruction, and also identified the important benefits to other resources. The BLM should designate these ACECs to fulfill its obligation to prioritize designation of ACECs under FLPMA, as well as to meet its obligations to avoid adverse environmental impacts and manage to protect the many values of the public lands.	The BLM gave full consideration to designating and persevering ACEC during this land use planning process. The BLM evaluated all ACEC nominations that complied with information requirements found in the BLM-1613 manual. The Draft RMP/EIS and its supplements analyzed and disclosed the impacts of the proposed ACEC management prescriptions and protections.

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			<p>The ACEC analysis in the Proposed RMP/Final EIS has been modified to include additional information, as requested in some public comments.</p> <p>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.</p>
ACEC	The Wilderness Society	<p>The two alternatives that would designate this white-tailed prairie dog ACEC do not provide any real protections from surface disturbance. This is quite different from the Moab Draft RMP/EIS, which, even under the heavy drilling alternative would maintain 660' buffers around active prairie dog colonies. The Moab Draft RMP also prescribes No Surface Occupancy within its white-tailed prairie dog ACEC. By proposing radically different management across Field Office boundaries, the BLM could easily be accused of arbitrary and capricious decision-making.</p> <p>In the ACEC nominations submitted by Center for Native Ecosystems, SUWA, and others, we provided extensive recommendations regarding how high value white-tailed prairie dog habitat like the Castle Valley Complex should be managed. The BLM should designate the ACEC for the Castle Valley Complex in the Price RMP and include management prescriptions that are consistent with CNE's previous recommendations.</p>	<p>As noted in the impact analysis, the management prescribed for the areas that contain the white-tailed prairie dog colonies, especially the largest areas, would protect the species in this area. The portions of the Price Field Office that have crucial white-tailed prairie dog habitat are also in areas that have a low development potential for mineral development. The low reasonably foreseeable development for these areas combined with the prescriptions and policies BLM is already required to follow outside the decisions in the RMP, any potential impacts to white-tailed prairie dogs would be mitigated.</p>
ACEC	Utah Rock Art Research Association	<p>Commentor provided several recommendations to expand the Rock Art ACEC, including expanding boundaries of the potential ACEC as well as new units to be added to the potential ACEC.</p>	<p>The commentor failed to provide enough information to identify the specific locations and the specific values to be considered as relevant and important values for ACEC consideration. In addition, as the commentor notes in their comments, the identification of all the sites the commentor identifies could draw more attention to the cultural resources</p>

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			than the protection an ACEC may be able to provide.
Air	BlueRibbon Coalition	BlueRibbon respectfully suggests more data on OHV emissions be included in the Final DEIS and that a discussion of OHV emissions be included in the Final DEIS if OHV emissions influence a decision.	Air quality emissions were not considered in Travel Plan decisions within the Draft RMP/EIS or the Proposed RMP/Final EIS.
Air	Public Lands Policy Coordination	The State encourages the BLM to impose air emission standards as lease conditions and conditions of approval for Applications for Permit to Drill.	The Proposed RMP/Final EIS, Chapter 2, Section 2.3.1 Common to All Alternatives has had a bullet added addressing this concern.
Air	Public Lands Policy Coordination	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 Proposed RMP/Final EIS, Chapter 2, Section 2.3.1 Common to All Alternatives has had a bullet added addressing this concern.
Air	U.S. Environmental Protection Agency	Because fugitive dust conditions could approach the National Ambient Air Quality Standards for particulate matter, additional information on fugitive dust conditions should be provided in the Final RMPIEIS as suggested in the comments of our November 30, 2004 letter.	The Revised (Final) Air Quality Baseline Report (FAQBR; Booz Allen Hamilton, 2008) calculates emissions by alternative, allowing comparison between alternatives. This includes updates to existing climate and air quality conditions as well recognition of the most current and relevant regulatory framework. The emissions calculations takes into account additional drilling activities in the coal bed natural gas fields and fugitive dust emissions. These calculations are the best estimate given existing conditions which includes electrification of the fields.
Cultural Resources	BlueRibbon Coalition	BRC certainly agrees with the need to protect important cultural resources which cannot be restored once destroyed. All of the action Alternatives each close significant of miles of existing OHV routes. First, there is no data in the DEIS that cultural resources are being, or have been, negatively impacted by the presence of humans engaging in looting or vandalism. Looting and vandalism are always a possibility in areas where humans may be found, but BRC submits such incidences are few and should not be used to justify such significant closures. (To the extent only OHV or mechanized travel would be prohibited along the closed routes, there is even less evidence tending to show that such uses lead to any higher degree of looting or vandalism.)	The text in Chapter 3 and Chapter 4 of the Proposed RMP/Final EIS has been clarified to include additional information on the existing impacts to cultural sites, as well as the potential for impacts associated with OHV use. The information presented is the result of data searches of the available cultural resource data, as well as the professional experiences of BLM resource specialists. The commentor provides no supporting evidence that incidences of looting, vandalism, or

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			incidental damage are few. References for the relationship between cultural resource damage and vehicle use have been provided.
Cultural Resources	BlueRibbon Coalition	BRC believes the closure approach cuts too broadly for the problem. The identified risk is “inadvertent impacts.” “Inadvertent impacts” is undefined and is not discussed in the DEIS. Inadvertent impacts are therefore an unfounded assumption which cannot be attributable to OHV or mechanized use.	Specific route closures for protection of cultural resources are related interactions between know routes and known sites or areas of high site concentration. The term “inadvertent” according to the dictionary means “unintentional”. Therefore, inadvertent impacts result from actions of people or uses that accidentally cause damage to cultural resources. This is not a new or unique definition of this word, therefore it does not need to be defined in the glossary. References for the relationship between cultural resource damage and vehicle use have been provided.
Cultural Resources	Carbon County Public Lands Department	The context that, "cultural resources could be affected in areas where livestock congregate and livestock trailing occurs." Fencing and or avoidance would alleviate this issue. Cattle congregating and rubbing could damage standing structures and pictograph panels through abrasion. Again Fencing would alleviate any perceived problem within this scenario. Trampling at spring sources and along stream banks, as well as trailing, could remove protective vegetation cover and increase compaction, creating indirect impacts to cultural resources through the acceleration of erosion above natural rates. Removing grazing removes water improvement maintenance and stewardship. It creates a scenario in which the spring would be lost. Impacts to specific areas can be identified and mitigated through the livestock grazing permitting process as needed, modifying management practices such as salting locations or additional range improvements.	As the commentor notes, impacts to site-specific areas could be identified and mitigated through the livestock grazing permitting process as needed, modifying management practices or including the construction of fences. However, at the landscape level, the noted impacts could occur and the noted impacts to cultural resources could occur prior to the site-specific implementation action occurring.
Cultural Resources	Colorado Plateau Archaeological Alliance	The Draft EIS appears to be 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 Draft EIS 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 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).	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.

			<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>See Appendix E of the Proposed RMP/Final</p>
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			EIS for SHPO concurrence with Section 106 consultation.
Cultural Resources	Colorado Plateau Archaeological Alliance	The Draft EIS (Alternative E) is remarkably equivocal on exactly what Section 106 compliance would be required as part of its recreation management (DEIS 2-75) or travel planning (DEIS 2-19). There is no explicit statement that designation of existing or future OHV routes would require Section 106 compliance prior to designation. Consequently, it must be concluded the BLM intends to conduct such inventories after the fact, and only if and when staff and funds are available (cf. DEIS 4-12).	<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>

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			<p>required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use.</p> <p>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.</p> <p>See Appendix E of the Proposed RMP/Final EIS for SHPO concurrence with Section 106 consultation.</p>
Cultural Resources	Colorado Plateau Archaeological Alliance	<p>Alternative E acknowledges that primitive and motorized recreation activities have the potential to cause “incidental” damage to cultural sites. It also states that eliminating cross-country OHV use and closing 1.5 million acres to OHV use would “eliminate the potential of incidental damage to cultural sites associated with pioneered routes in areas open to cross-country OHV use” (DEIS 4-37). This statement is problematic because it assumes that closure of areas and/or routes will “eliminate” the potential that OHVs will damage cultural sites. Recent research in Tenmile Canyon near Moab has demonstrated a prevalence of direct and indirect impacts to cultural sites by OHVs that improperly left an established route (Spangler and Boomgarden 2007).</p>	<p>During the development of the RMP, cultural resource conflicts were considered during the route identification process.</p> <p>Allocation of law enforcement presence for closed areas, closed routes, or OHV use away from designated/identified routes is an Administrative Action by the BLM and does not require a specific planning decision to implement.</p>
Cultural Resources	Colorado Plateau Archaeological Alliance	<p>If no Section 106 compliance is required prior to route designations, that itself is an inherent assumption that OHVs would cause minimal additional impacts and that the damage caused to cultural resources in the past were singular events that won’t be repeated, or that that cultural resources were destroyed by past events and therefore cannot be further damaged through future use. Such assumptions are inherently flawed in that (1) the BLM has little or no baseline data to know the nature of or extent of the damage to these sites; (2) although some scientific data will have been irretrievably lost, it is highly probably most sites damaged through direct or indirect OHV activities will retain some scientific value, and that continued OHV use will inevitably result in continued degradation of the remaining scientific values; and (3) there is no acknowledgement that future OHV use of designated trails through archaeological site could result in accelerated erosion that would expose subsurface cultural deposits not evident when the site surface was initially</p>	<p>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</p>

		<p>damaged.</p>	<p>of historic properties based on existing inventory information.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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			See Appendix E of the Proposed RMP/Final EIS for SHPO concurrence with Section 106 consultation.
Cultural Resources	Colorado Plateau Archaeological Alliance	A key component that must be acknowledged is that data recovery is an adverse effect that also must be properly considered through the Section 106 process. The Draft EIS hints that the impact to cultural resources would be "minimal because (of) inventories, Section 106 clearances and mitigation measures" (DEIS 4-37). Although this statement is related to construction of new recreational facilities, it would imply an overriding assumption related to all federal undertakings that Section 106 compliance will result in minimal impacts to cultural resources. Such an assumption is incompatible with existing law and regulations (cf. King 2000a, 2000b). Such assumptions also fail to acknowledge indirect or cumulative impacts to cultural resources resulting from such undertakings regardless of Section 106 compliance.	The Draft RMP/EIS and the wilderness characteristics supplement is correct that adherence to Section 106 would result in minimal impacts to cultural resources, as it is the BLM's policy to first avoid cultural sites that are eligible for the National Register, and only when other options are not feasible to implement other mitigation measures. In any case of mitigation, including destruction of a site's physical characteristics through scientific excavation, the impacts would be decreased to the extent appropriate in accordance with Section 106 consultation efforts. Other impacts from "piecemeal degradation" have been added in the Proposed RMP/Final EIS in the cultural resources and ACEC sections of Chapter 4.
Cultural Resources	Colorado Plateau Archaeological Alliance	It must be noted that Section 110 of the National Historic Preservation Act does not limit the federal agency's responsibilities to the identification of eligible properties. Rather, it unequivocally specifies the responsibilities of federal agencies to proactively identify, evaluate and nominate National Register-eligible historic properties under their jurisdiction or control (see 16 U.S.C. Section 470 h2(a)(2)(A)). The Draft EIS offers no indication that the PFO will indeed evaluate or nominate sites under its jurisdiction or control, and as such Alternative E and all other action alternatives that fail to adequately address complete compliance with Section 110 are clearly deficient.	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 effects 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.

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			<p>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.</p> <p>As noted by the commentor, the Draft RMP/EIS, page 2-35, outlines by alternative which areas would receive priority for Section 110 inventories. Proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the Field Office.</p>
Cultural Resources	Colorado Plateau Archaeological Alliance	The Draft EIS also fails to adequately acknowledge that cumulative impacts from large-scale energy development that could adversely affect site setting and integrity, even if the historic property itself is avoided (see 36 CFR 800.5(a)(2)(v)). The Draft EIS offers only a cursory discussion of such impacts, suggesting that Section 106 compliance would require cultural surveys and avoidance mitigation of identified sites. There is minimal discussion as to the cumulative impacts of federal undertakings on the integrity and setting of historic properties (see Draft EIS 4-3).	Impacts from "piecemeal degradation" have been added in the Proposed RMP/Final EIS in the cultural resources and ACEC sections of Chapter 4. However, the settings associated with many cultural sites in the Price Field Office do not contribute to the eligibility for the National Register of Historic Places. The visual impacts of energy development on the setting of various cultural sites has been noted in the Proposed RMP/Final EIS.
Cultural Resources	Colorado Plateau Archaeological	Likewise, there is little or not acknowledgement of the indirect or cumulative impacts to Traditional Cultural Properties (TCPs) of traditional and spiritual significance to Native Americans. TCPs can	The Proposed RMP/Final EIS has been modified to include additional information on

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	Alliance	include ancestral architectural sites, burials, rockshelters and rock art localities, as well as entire cultural landscapes. For example, the Hopi Tribe has identified the entire Nine Mile Canyon drainage as a TCP, something not acknowledged in the Draft EIS.	identified traditional cultural properties and impacts to them.
Cultural Resources	Colorado Plateau Archaeological Alliance	The Draft EIS also makes little or no effort to address Areas of Potential Effect outside of designated route corridors, or to justify a 400-foot-from-center corridor as the APE. In fact, research within the PFO and elsewhere in Utah have demonstrated that the Area of Potential Effect may extend well beyond the corridor itself to those areas adjacent to or accessible from the actual routes. Recent research in southeastern Utah has demonstrated that damage to archaeological sites by OHVs can be both direct (driving vehicles through archaeological deposits) and indirect (using OHVs to gain access to topographic locations where sites are located). Indirect impacts were considered to be more common in that archaeological sites were being impacted by pedestrians who used mechanized vehicles to arrive at or near site locations. Research also found that sites with the greatest evidence of adverse human impacts are those visible from an existing OHV route.	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.
Cultural Resources	Hopi Cultural Preservation Office	Therefore, we request continuing consultation on the selection and allocation of our ancestral sites for interpretive development, educational uses, public visitation, and scientific uses.	BLM is committed to consult with Native American Tribes as required by 36 CFR 800.2 and described in BLM Manual 1820 and Handbook 1820. Appropriate implementation level actions will follow the BLM's established protocol for consultation.
Cultural Resources	Public Lands Policy Coordination	The state suggests that BLM develop a specific ongoing program to identify and target identification efforts under Section 110 of the National Historic Preservation Act. The state recommends that priorities include potential heritage tourism development in addition to more typical resource investigation and/or protection efforts. Under such a flexible strategy, identification efforts could better respond to public needs and interests.	The type of actions recommended by the commentor are administrative and do not require land use planning decisions to accomplish. However, the Draft RMP/EIS on page 2-38 does identify areas where cultural resource inventory areas are prioritized, and would be conducted under Section 110.
Cultural Resources	The Wilderness Society	IM 2007-030 confirms that a Class III inventory of cultural resources is required prior to route designation in travel planning, even for designation of existing routes ² , when “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.” As noted above, the agency has acknowledged that motorized recreation and access leads to damage to cultural resources, as does access for other uses. The Supplement confirms that “[s]urface disturbing activities in association with coal and oil/gas development, such as road building, well pad construction, and so forth, do have the potential to damage cultural and paleontological resources. Surface disturbing activities could expose sites.” Supplement, p. 4-45. By identifying areas for motorized use and oil and gas development, the agency can also predict increased pressure and adverse affects on cultural resources. In the Draft RMP/EIS, the BLM acknowledged that without a change in management of cultural resources:	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.

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		<p>Case-by-case management combined with roadway improvements, increased recreation demand, and reasonably foreseeable mineral development could increase inadvertent damage to or loss of cultural resources in the region. Any damage or loss of significant cultural resources would constitute a significant impact.</p> <p>Draft RMP, p. 4-12. The Draft RMP/EIS notes that the preferred alternative will reduce the potential for significant damage or loss, although it would not be avoided. Draft RMP, p. 4-22.</p> <p>All of the alternatives are likely to lead to increased, concentrated access in areas with cultural resources and cause adverse impacts, so a Class III inventory of these routes should be conducted prior to analysis and the BLM should adopt the alternative with the most protection for cultural resources, which corresponds to Alternative E. Compliance with IM 2007-030 could have been incorporated into this Supplement previously and the agency should do so now.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>See Appendix E of the Proposed RMP/Final EIS for SHPO concurrence with Section 106</p>
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			consultation.
Cultural Resources	Utah Rock Art Research Association	The drilling of over 100 wells on the West Tavaputs Plateau without the benefit of an Environmental Impact Study. Commercial traffic supporting this drilling activity makes use of Nine Mile Canyon to access the Tavaputs Plateau. A 2007 Carbon County 24-hour road survey counted 340 vehicles using the Nine Mile Canyon road. The vast majority of these are large commercial vehicles supporting oil and gas activity. The Nine Mile Canyon road was not built to withstand this level of activity and vehicle weight. Its proximity to rock art and archeological sites raises concerns about dust, vibration, airborne pollutants including magnesium chloride, preservation of the visual and cultural landscape, and the safety of tourists who wish to visit cultural sites. We have witnessed and photographed the damage sustained by Nine Mile rock art adjacent to the dirt road through the canyon. It is our understanding that at least one Native American tribe has expressed concern about impact to cultural resources and we have spoken with tourists who, despite using guidebooks with mileage and GPS positional data, cannot find sites in the canyon due to the level of dust overlaying the rock art. The BLM failed to plan for these concerns or to mitigate them after they have occurred.	Drilling oil and gas wells and any associated impacts from commercial traffic is an implementation-level action and is outside the scope of this RMP/EIS.
Cultural Resources	Utah Rock Art Research Association	We are concerned about the process used to identify cultural resource management associated with this supplement. It is not clear to us how much of the region has been subject to cultural resource inventories, how the BLM is making cultural resource decisions in areas that have not been surveyed, the number of known sites, and how many of these sites receive special protection under this supplement.	The Supplement only addressed additions to the Draft RMP/EIS that are outside the information already contained in the Draft RMP/EIS. The information the commentor requests is already contained in Section 3.2.4 of the Draft RMP/EIS and the Proposed RMP/Final EIS.
Cultural Resources	Utah Rock Art Research Association	We are concerned about the absence of a clearly stated intent to initiate NHPA Section 106 compliance prior to the designation of OHV routes and other development activities. Roads provide access to site areas; therefore, their impact is greater than the perceived footprint of a narrow road corridor. The location of roads and OHV routes must give consideration both to the cultural resources directly in their path and the resources they provide access to.	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

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			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 Appendix E for SHPO concurrence with Section 106 consultation.
Forestry and Woodlands	Public Lands Policy Coordination	The Supplement also notes that a Forest and Woodlands Management Plan would be created under all alternatives. 2007 Supp. At 2-13. Please clarify what management actions would be authorized within wilderness characteristics lands under a Forest and Woodlands Management Plan.	The management prescription for non-WSA lands with wilderness characteristics would be closed to commercial wood harvesting (see page 2-13 of the Supplement)
General Comments	Bill Barrett Corporation	Under FLPMA, the valid existing rights and obligations conferred to operators from the Department of the Interior under these federal leases are not pre-empted, or otherwise excused, by BLM's designation of wilderness characteristics management areas. In addition, BLM cannot deny operators access to their leases (i.e. roads, pipelines) when such access necessarily has to traverse across unleased wilderness characteristics areas	Please see general comment response # 6
General Comments	ConocoPhillips Company	While the SDEIS states valid existing lease rights would be honored, it does not address how the agency would ensure access to the 36,000 acres of lands currently under lease but included in lands slated for withdrawal from leasing. Access to these leases would be needed in order for them to be developed despite the fact the surrounding lands would be closed to leasing and development. BLM must specify how it would manage these lands with respect to valid existing rights.	Please see general comment response # 6
General Comments	Coyote Oil & Gas	Another very serious concern to current operators in the area would be to know how, under	Please see general comment response # 6

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	Company, LLC	Alternative E, the BLM can ensure legal access lands now under lease but surrounded by lands slated for withdrawal from leasing. Many operators have plans to expand or improve existing operations. Alternative E could easily cripple such efforts, which already are severely regulated.	
General Comments	Discovery Exploration Inc.	While the SDEIS states valid existing lease rights would be honored, it fails to discuss how the agency would ensure access to the 36,000 acres of lands currently under lease but included in lands slated for withdrawal from leasing. Access to these leases would be needed in order for them to be developed despite the fact the surrounding lands would be closed to leasing and development. The BLM needs to specify how it would manage these lands with respect to valid existing rights.	Please see general comment response # 6
General Comments	EOG Resources Inc.	The BLM must acknowledge that some areas with wilderness characteristics contain current mineral leases. This disclosure and the impacts that may result to currently leased lands with wilderness characteristics must be included in the final EIS. The BLM must clearly disclose in the final EIS that the issuance of these leases confer certain rights to the lessee, one of which is the right to develop the leasehold. Therefore, where a ROW is not needed for access, an oil and gas operator may drill and produce a well. To do so, a well access road may be constructed. Alternative B precludes the construction of new roads; however, where leases are valid, roads may, in fact, be constructed. The management of areas with wilderness characteristics to preserve undeveloped character and provide opportunities for primitive recreational opportunities and experiences of solitude will be compromised in areas where valid existing rights allow for activities that reflect a competing resource demand.	Please see general comment response # 6
General Comments	EOG Resources Inc.	The BLM must not indirectly disallow access to its leases by the imposition of an ACEC designation that would exclude the issuance of ROWs. EOG owns leases issued by the State of Utah that lie within areas described by the DEIS as having high occurrence potential for conventional oil and gas resources. By disallowing access to valid leases, the BLM selection of Alternative E would constitute an indirect taking.	Please see general comment response # 6
General Comments	Fidelity Exploration and Production Co.	While the DSEIS states valid existing lease rights would be honored, it fails to discuss how the agency would ensure access to the 36,000 acres of lands currently under lease but included in lands slated for withdrawal from leasing. In order to develop the lands leases would be needed in order for them to be developed despite the fact the surrounding lands would be closed to leasing and development. The BLM needs to specify how it would manage these lands with respect to valid existing rights.	Please see general comment response # 6
General Comments	Independent Petroleum Association of Mountain States (IPAMS)	Right of Way (ROW) exclusions on 60% of the PFO would mean only 95% of existing oil and gas leases would be accessible. The final RMP/EIS should ensure that ROW exclusions do not deny access to any valid existing leases.	Please see general comment response # 6
General Comments	Public Lands Advocacy	While the SDEIS states valid existing lease rights would be honored, it fails to discuss how the agency would ensure access to the 36,000 acres of lands currently under lease but included in lands slated for withdrawal from leasing. Access to these leases would be needed in order for them to be	Please see general comment response # 6

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		developed despite the fact the surrounding lands would be closed to leasing and development. BLM needs to specify how it would manage these lands with respect to valid existing rights.	
General Comments	Questar Exploration & Production Company	<p>In addition to designating the non-WSA lands with wilderness characteristics as no leasing, these areas are also designated as rights-of-way (ROW) exclusion areas. This will have the unacceptable result of stranding existing federal and state oil and gas leases which are located inside the non-WSA lands with wilderness characteristics and proposed ACECs. There are at present 26,019 acres leased for oil and gas within seven of the non-WSA lands with wilderness characteristics. The ROW exclusions on 60% of the PFO will result in stranding 5% of existing oil and gas leases and will negatively impact the ability of oil and gas operators to access mineral leases and transport their product to market. This, in turn, negatively impacts the local, state and national economies. The ROW exclusions contemplated in Alternative E have not been adequately analyzed in terms of EPA 2005, EPCA 2000, NEP, and Executive Order 13212 and are unnecessarily applied to energy development.</p> <p>Management decisions such as these made by the PFO on federal lands will not only affect energy development on public lands but will also directly impact the ability of state and private landowners to develop their minerals. The Supplement to 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.</p>	Please see general comment response # 6
General Comments	Shell Exploration	Analogizing the above case law relating to the retroactive application of amendments and revisions to agency land use plans, Shell maintains that RMP revisions may be applied retroactively so long as they do not interfere with valid existing rights. It therefore stands to reason that Implementation of Alternative E would violate valid existing rights in violation of BLM procedures and the case law.	Please see general comment response # 6
General Comments	Shell Exploration	RMP Section 4.3.16.1 indicates that 36,000 acres of existing mineral leases are located in areas designated as closed to oil and gas leasing, but these leases could still be developed. The Final RMP should explain the process that will be used under these circumstances to allow these leases to be developed.	Please see general comment response # 6
General Comments	Western Lands Services	While the SDEIS states valid existing lease rights would be honored, it fails to discuss how the agency would ensure access to the 36,000 acres of lands currently under lease but included in lands slated for withdrawal from leasing. Access to these leases would be needed in order for them to be developed despite the fact the surrounding lands would be closed to leasing and development. The BLM needs to specify how it would manage these lands with respect to valid existing rights.	Please see general comment response # 6
General Comments	Williams Production RMT Co.	While the SDEIS states valid existing lease rights would be honored, it fails to discuss how the agency would ensure access to the 36,000 acres of lands currently under lease but included in lands slated for withdrawal from leasing. Access to these leases would be needed in order for them to be developed despite the fact the surrounding lands would be closed to leasing and development. BLM needs to specify how it would manage these lands with respect to valid existing rights.	Please see general comment response # 6
Lands and Realty	Bill Barrett	Section 202(e)(2) of FLPMA requires the Secretary of the Interior to report to Congress to decisions	Please see general comment response # 5

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	Corporation	on principal uses of lands in areas greater than 100,000 acres. 43 U.S.C. § 1712. FLPMA then empowers Congress to review BLM’s decision. In the event BLM decides to close 100,000 acres or more to minerals activity in the Final Price RMP, then such a decision would automatically trigger this reporting and Congressional review provision.	
Lands and Realty	Bjork, Lindley, & Little	Alternative E runs afoul of the requirements of FLPMA because it does not disclose the planned withdrawal of more than 5,000 acres from oil and gas leasing, as required by Section 204 of FLPMA.	Please see general comment response # 4
Lands and Realty	Bjork, Lindley, & Little	Additionally, the document fails to explain that Alternative E proposes management decisions that exclude a principal or major use from more than 100,000 acres, which must be reported to Congress pursuant to Section 202 of FLPMA.	Please see general comment response # 5
Lands and Realty	Petro-Canada Resources (USA) Inc.	An additional concern is that the Supplemental Draft EIS fails to comply with section 204 of FLPMA because it does not disclose the planned withdrawal of more than 5,000 acres from oil and gas leasing.	Please see general comment response # 4
Lands and Realty	Petro-Canada Resources (USA) Inc.	In addition the document fails to explain that Alternatives C and E constitute management decisions which exclude a principal or major use (ie oil and gas leasing and development) from more than 100,000 acres, which is required to be reported to Congress under section 202 of FLPMA	Please see general comment response # 5
Lands and Realty	Public Lands Policy Coordination	For this reason, it is in the best interests of the United States as well as the State of Utah that the Final RMP create a robust and effective program for land tenure adjustments.	The Draft RMP/EIS includes criteria for use in land tenure adjustments outside of FLPMA Sec. 203 land sales. Additionally, the Draft RMP/EIS notes that "Exchanges with the State of Utah would be given a priority consideration" (Draft RMP/EIS page 2-19).
Lands and Realty	Public Lands Policy Coordination	Page 2-20’s “Disposal of Lands Through Exchange” 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.	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 Draft RMP/EIS has identified lands generally available for sale, as well as criteria to guide future exchanges. The Draft RMP/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

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			and for BLM. The Draft RMP/EIS recognizes this by noting on page 2-92 that "exchanges with the State of Utah would be given a priority consideration."
Lands and Realty	Shell Exploration	Implementation of all or a portion of Alternative E likely would result in closure of substantial acreage of public lands to oil and gas development. As explained by BLM guidance, "[i]f land use plan decisions close areas of 100,000 acres or greater in size to a principal or major use of 2 years or more, Congress must be notified of the closure upon its implementation as prescribed in 43 CF.R. § 1610.6." BIM Manua11-1693 at 13 (Mar. 11,2005).	Please see general comment response # 5
Lands and Realty	The Wilderness Society	The BLM should specifically prioritize the acquisition of Utah state trust lands located in areas with wilderness characteristics, both WSAs and non-WSAs. In addition, the BLM should also consider the purchase of Utah state trust lands, not just exchanges. There are various funding sources at the BLM's disposal for such land acquisitions. Furthermore, as administrative land exchanges or purchases are time intensive, the BLM should establish a process to ensure that such land acquisitions take place, particularly in wilderness characteristic areas where the BLM has determined that it will manage lands as ACECs or under other protective designations that would be at odds with the mission of the Utah School and Institutional Trust Lands Administration, which is primarily to derive maximum economic benefit from state trust lands.	The Proposed RMP/Final EIS has been adjusted to include the following decision: "Prioritize acquisition of lands within special designations, including WSAs and ACECs." Use of the word acquisition was purposefully included to allow for the use of various methods through which such lands may be obtained by the BLM. For non-WSA lands with wilderness characteristics, several of the criteria for land tenure adjustments, already considered in the Draft RMP/EIS, would allow for consideration of acquisition of lands located in areas with wilderness characteristics, including the following criteria: "The changes promote more effective management and meet essential resource objectives through land ownership consolidation." and "The changes are determined to be in the public interest." and "The changes result in a gain of important manageable resources on public lands."
Lands and Realty	Union Telephone Company	The BLM should facilitate additional siting of communications towers in the Price Resource Area because this Area lacks any other feasible alternatives to satisfy this statutory mandate.	The Draft RMP/EIS would allow for the siting of communication towers outside of right-of-way avoidance and exclusion areas. The Draft RMP/EIS considers a range of alternatives for right-of-way avoidance and exclusion areas. The siting of communication towers is an implementation level decision that would be considered on a case-by-case basis and with site-specific NEPA analysis.
Lands and Realty	Utah State Office of	It should be noted for all alternatives that, pursuant to the decision of the United States District Court	Non-BLM lands could be indirectly impacted

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	Education	for the District of Utah in Utah v. Andrus, BLM is obligated to grant reasonable access to the State of Utah and its lessees 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).	by RMP decisions both positively and negatively. The analysis in Chapter 4 of the PRMP/FEIS has been modified accordingly. The BLM does provide for reasonable access to all SITLA lands under all alternatives. 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 Price Draft RMP/EIS travel management plan recognizes the requirement to provide access to SITLA lands per the Cotter decision. Also, please see the revised analysis under socioeconomics in Chapter 4 of the Proposed RMP/Final EIS.
Livestock Grazing	Carbon County Public Lands Department	When considering using buffer zones of no new surface disturbance (excluding fence lines) along any streams, BLM should consider the loss of stock watering rights on grazing allotments and the negative effects of destabilizing the livestock industry that would contravene Congress' mandate in TGA.	The definition of a surface disturbing activity has been clarified in the glossary of the Proposed RMP/Final EIS. Livestock grazing is not considered a surface disturbing activity, and therefore the no surface disturbance requirement along streams would not apply to livestock grazing or water along undeveloped streams. Any developments implemented to protect the water and/or riparian areas could be permitted using the exceptions noted in Appendix G of the Proposed RMP/Final EIS.
Livestock Grazing	Carbon County Public Lands Department	If BLM chooses to consider this option, i.e. to manage forage by natural actions to accommodate the Wilderness Act of 1964 and a judicial opinion of 2006, we remind them that such action would violate a Federal Supreme Court decision pertaining to conservation use of grazing permits.	Managing vegetation using natural actions does not include reallocating forage to conservation use, but rather refers to the methodology allowed in treating vegetation communities. Under Alternatives C and E, "Vegetation would be manipulated using only natural processes, such as wildland fire, disease, and insects." (page 2-34 of the Draft RMP/EIS)

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Livestock Grazing	Public Lands Policy Coordination	Utah State University has completed research into some of the issues related to the livestock industry in the Utah and Price FO. (A portion of the report is attached as “Attachment E.”) The report indicates that the trend in livestock grazing preference and authorized use in the Price Field Office is downward. It indicates that permitted AUMs have been reduced by at least 29% since 2003. The Draft EIS only lists 5,517 AUMs as suspended, and does not discuss reinstatement of these AUMs anywhere within the Price Field Office.	The information from the Utah State University research has been incorporated in the Proposed RMP/Final EIS, where appropriate. Additionally, an appendix has been added to the Proposed RMP/Final EIS to include a description of the livestock allocations (active and suspended) for each allotment for all the alternatives. Finally, activation of suspended AUMs is not an RMP-level decision, but is guided by the BLM’s grazing regulations (41 CFR 4100).
Livestock Grazing	Public Lands Policy Coordination	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.	<p>The BLM does not propose the permanent closure of allotments or portions thereof. However, certain allotments may not be available for livestock grazing over the life of the plan. The allotments considered as not available vary by alternative. Subsequent revisions of the land use plan may consider opening these areas to livestock grazing.</p> <p>The vast majority of the Price Field Office would remain available for livestock grazing. For those limited areas identified in the grazing alternatives of the Draft RMP/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.</p>

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			As stated in the Draft RMP/EIS (pg. 2-5, 2-11 and 2-16), for those areas open to livestock grazing, grazing would be managed on an allotment basis according to the Guidelines for Livestock Grazing Management to meet the Standards for Rangeland Health, 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.
Livestock Grazing	Western Watersheds Project, Inc.	The Price 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).	According to the Land Use Planning Handbook (BLM-H-1601-1) the Draft RMP/EIS identifies lands available or not available for livestock grazing and considered the following factors: a. Other uses for the land. b. Terrain characteristics. c. Soil, vegetation, and watershed characteristics. d. The presence of undesirable vegetation, including significant invasive weed infestations. e. The presence of other resources that may require special management or protection, such as special status species, Special Recreation Management Areas (SRMAs), or ACECs. The alternatives considered different management options based on management of specific resources in some allotments. Based on rangeland health assessments, the remainder of the allotments are capable of sustaining the managed levels of livestock grazing noted in Appendix O of the Proposed RMP/Final EIS.
Minerals and Energy Resources	American Petroleum Institute	In 2003 industry reviewers found the reasonably foreseeable development scenario prepared for the Price RMP revision to be inaccurate because it relied on outdated information and failed to consider the improved economic climate for the exploration for and development of natural gas. It also failed	Please see general comment response # 9

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		to consider the increased activity already taking place in the Price Field Office Planning Area. Industry reviewers recommended that BLM make use of geologic data available from the energy industry to upgrade the RFD scenario. Since the reasonably foreseeable development scenario was not revised in conjunction with the Draft Supplemental DEIS, the potential impacts of implementation of Alternative E and the other alternatives would be significantly greater than projected by BLM. We recommend BLM re-examine the consequences of adoption of Alternative E as well as the alternatives contained in the previously released Price Draft EIS/RMP by evaluating recent geologic data and taking cognizance of increased exploration and development activities in the area.	
Minerals and Energy Resources	American Petroleum Institute	Furthermore, in preparing this document BLM has neglected to consider the findings of EPCA Phase II (Scientific Inventory of Onshore Federal Lands' Oil and Gas Resources and the Extent and Nature of Restrictions or Impediments to Their Development - Phase II Cumulative Inventory, November 2006), which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10
Minerals and Energy Resources	Bill Barrett Corporation	In the event Alternative E is selected, then over 900,000 acres of federal lands would be closed to oil and gas leasing and development. Therefore, the Department of the Interior would be required to comply with FLPMA's formal withdrawal requirements. FLPMA requires the Secretary of the Interior to provide notice of proposed withdrawal of 5,000 acres or more of federal land from minerals development in the Federal Register and conduct hearings regarding the withdrawal. 43 U.S.C. § 1714(b)(1) & (h).	Please see general comment response # 11
Minerals and Energy Resources	ConocoPhillips Company	The reasonably foreseeable development (RFD) scenario prepared for the Price RMP revision in 2003 was found inaccurate by industry because it relied on outdated information and did not consider the improved economic climate for the exploration for and development of natural gas along with the increased activity taking place in the Price FO area. Thus it was recommended that BLM utilize a broader spectrum of current geologic, geophysical and engineering data available from the energy industry to upgrade the RFD scenario. Since the RFD was not revised in conjunction with the SDEIS, the potential impacts of implementation of Alternative E and the other alternatives would be radically greater than projected by BLM. COPC recommends that the BLM reanalyze the effects of the Alternative E as well as the alternatives contained in the previously released Price Draft EIS/RMP by utilizing updated geologic, geophysical and engineering data and recognize the increased potential for and interest in exploration and development activities in the area.	Please see general comment response # 9
Minerals and Energy Resources	ConocoPhillips Company	BLM must recognize the findings of EPCA Phase II which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10
Minerals and Energy Resources	Coyote Oil & Gas Company, LLC	The Public Lands Advocacy (another legitimate special interest group) claims that "...the reasonably foreseeable development scenario prepared for the Price RMP revision in 2003 was found inaccurate by industry because it relied on outdated information and didn't consider the improved economic climate [I would say increasingly urgent need] for...natural gas. Specifically, I request that BLM again analyze the relevant alternatives in the current Price Draft EIS/RMP, this time using current industry data and considering current the very beneficial industry activities in the area	Please see general comment response # 9
Minerals and	Discovery	Of additional concern is that the reasonably foreseeable development scenario prepared for the	Please see general comment response # 9

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Energy Resources	Exploration Inc.	Price RMP revision in 2003 was found inaccurate by industry because it relied on outdated information and didn't consider the improved economic climate for the exploration for and development of natural gas along with the increased activity taking place in the FO area. It was recommended that the BLM utilize a broader spectrum of current geologic data available from the energy industry to upgrade the RFD scenario. Since the RFD was not revised in conjunction with the SDEIS, the potential impacts of implementation of Alternative E and the other alternatives would be radically greater than projected by BLM. We recommend that the BLM reanalyze the effects of the Alternative E as well as the alternatives contained in the previously released Price Draft EIS/RMP by utilizing updated geologic data and recognizing increased exploration and development activities in the area.	
Minerals and Energy Resources	Discovery Exploration Inc.	The BLM has ignored the findings of EPCA Phase II which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10
Minerals and Energy Resources	Fidelity Exploration and Production Co.	BLM fails to acknowledge and adequately analyze the significant negative impacts Alternative E would have on future oil and gas development. The DSEIS does not accurately identify and the significant loss of energy, particularly natural gas resources, associated with the restrictions. Furthermore, the DSEIS does not address the contribution Utah's oil and gas development makes to the nation's domestic energy supplies.	The analyses contained in the Price Draft RMP/EIS and the Wilderness Characteristics Supplement to the Draft RMP/EIS have been modified to improve the direct and cumulative impacts analysis for minerals. Specifically, the following revisions were made: 1) an analysis of the impacts on the amount of recoverable oil and gas resources under Alternative E was added; 2) an analysis of the impacts from isolating SITLA parcels due to closing adjacent BLM lands to mineral leasing, making the SITLA parcel less economical for development; and 3) the cumulative impacts section was revised to describe the cumulative impacts of the various alternatives on minerals development.
Minerals and Energy Resources	Fidelity Exploration and Production Co.	Of additional concern is that the RFD scenario prepared for the Price RMP revision in 2003: 1) relied on the outdated information, 2) didn't consider the improved economic climate for the exploration four and development of natural gas, and 3) didn't consider the increased activity taking place in the Price FO planning area. Rather than relying on out dated data, the RFD should be based on such factors as 3-D seismic activity in the area and the current level of APD activity. BLM should also solicit information about the potential for oil and gas development whom the operators within the Price FO area to assist in the preparation of a realistic RFD scenario.	Please see general comment response # 9
Minerals and Energy Resources	Fidelity Exploration and Production Co.	Since the RFD scenario was not revised in conjunction with the DSEIS, the potential impact of implementation of Alternative E and the other alternatives would be radically greater than projected by BLM	Please see general comment response # 9

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Minerals and Energy Resources	Fidelity Exploration and Production Co.	Management guidance for contained in Alternative E ignores the high oil and gas potential of much of the planning area and is thereby not consistent with the Energy Policy and Conservation Act Reauthorization of 2000 and the Energy Policy Act of 2005.	The management philosophy of Alternative E focuses first on protection of non-WSA lands with wilderness characteristics, then on protection of other resources values, then on extraction of mineral resources. This prioritization is within the BLM's legal authorities for multiple use management provided by FLPMA, as is Alternative A which focuses first on the extraction of mineral resources while providing protection to non-consumptive within the confines specifically identified by law. The Draft RMP/EIS provides the decisionmaker a range of alternatives from which to develop the Proposed RMP and eventually the Final RMP/ROD.
Minerals and Energy Resources	Fidelity Exploration and Production Co.	The BLM has ignored the findings of its own EPCA Phase II report, which evaluated and analyzed the impacts of drilling permit conditions in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10
Minerals and Energy Resources	Independent Petroleum Association of Mountain States (IPAMS)	By a 2006 Directive from the BLM Director, the BLM cannot effect a de facto closure of thousands of acres of public lands to oil and gas leasing without following FLPMA's Section 204 withdrawal procedures: "Except for Congressional withdrawals, public lands shall remain open and available for mineral exploration and development unless withdrawal or other administrative actions are clearly justified in the national interest in accordance with the Department of the Interior Land Withdrawal Manual 603 DM 1, and the BLM regulations at 43 C.F.R. 2310." BLM Energy and Non-Energy Mineral Policy (April 21, 2006). The BLM formally adopted this policy through IM 2006-197. Consequently, the 2006 Energy and Non-Energy Mineral Policy with which the BLM must comply, conditions the closure of lands available to mineral exploration and development on FLPMA's withdrawal procedures.	Please see general comment response # 11
Minerals and Energy Resources	Independent Petroleum Association of Mountain States (IPAMS)	Alternative B represents a 60% decrease in the total amount of acres available for leasing from the No Action Alternative. The BLM must ensure compliance with the Energy Policy Act of 2005, EPCA, the National Energy Policy, and Executive Order Number 13212, 66 Fed. Reg. 28357 (May 18, 2001) to reduce rather than increase impediments to federal oil and gas leasing. IPAMS strongly opposes adoption of Alternative E.	Please see general comment response # 10
Minerals and Energy Resources	Independent Petroleum Association of Mountain States (IPAMS)	The BLM fails to acknowledge in the Supplement 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	The impacts analysis within the Wilderness Characteristics Supplement to the Draft RMP/EIS does acknowledge that some impacts from energy development are temporary, explaining that in some instances reclamation can occur to the point that an

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		resources is not necessary.	“intrusion is substantially unnoticeable [in about] 5 to 10 years.” (see page 4-47 of Supplement).
Minerals and Energy Resources	Public Lands Advocacy	Of additional concern is that the reasonably foreseeable development scenario prepared for the Price RMP revision in 2003 was found inaccurate by industry because it relied on outdated information and didn't consider the improved economic climate for the exploration for and development of natural gas along with the increased activity taking place in the FO area. It was recommended that BLM utilize a broader spectrum of current geologic data available, including geophysical data, from the energy industry to upgrade the RFD scenario. Since the RFD was not revised in conjunction with the SDEIS, the potential impacts of implementation of Alternative E and the other alternatives would be radically greater than projected by BLM. We recommend BLM reanalyze the effects of the Alternative E as well as the alternatives contained in the previously released Price Draft EIS/RMP by utilizing updated geologic data and recognizing increased exploration and development activities in the area.	Please see general comment response # 9
Minerals and Energy Resources	Public Lands Advocacy	BLM has ignored the findings of EPCA Phase II which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10
Minerals and Energy Resources	Public Lands Policy Coordination	The Utah Legislature in 2006 adopted an energy policy requiring streamlined permitting processes to expedite issuance of permits for energy-related projects. Utah has a process to perform this function through its Department of Environmental Quality. The Price BLM Office should commit to utilizing this established process in the review of such applications.	Federal laws, rules, regulations and policies govern the procedures for processing all Federal projects.
Minerals and Energy Resources	Public Lands Policy Coordination	The State of Utah is concerned that the impact that protection of non-WSA lands with wilderness characteristics on SITLA inholding has not been adequately addressed.	The number of oil and gas wells foregone on SITLA inholding due to managing non-WSA lands with wilderness characteristics as closed to leasing has been estimated in the Proposed RMP/Final EIS analysis, as has resulting loss of revenues.
Minerals and Energy Resources	Public Lands Policy Coordination	The Draft Resource Management Plan and Draft Environmental Impact Statement does not assess the cumulative timing limitations and their impact on oil and gas exploration and development.	The Proposed RMP/Final EIS has been modified to include an analysis of the collective timing restrictions on oil and gas leasing (see EPCA analysis).
Minerals and Energy Resources	Public Lands Policy Coordination	Please carefully explain how the Price Field Office would administer existing leases while managing to protect wilderness characteristics. Please also explicitly state whether the Price Field Office intends to allow lease renewal for existing leases within non-WSA lands with wilderness characteristics.	Valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. As noted in Chapter 1 under Planning Criteria and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decision are subject to valid existing rights.

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			<p>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. The Proposed RMP does not propose to protect, preserve, and maintain wilderness characteristics on any lands that are currently leased. Concerning renewal of leases, this would be addressed on a case-by-case basis with the circumstances of each lease being considered at the time of the renewal request.</p>
Minerals and Energy Resources	Public Lands Policy Coordination	<p>Finally, please carefully analyze and discuss the extent to which precluding coal development within this area would impact the economic viability and operations of coal mining on nearby state lands as well as social and economic impacts to the state and counties.</p>	<p>Prescriptions to protect, preserve, and maintain wilderness characteristics under Alternative E and the Proposed RMP do not preclude coal leasing. However, to protect wilderness characteristics there would be stipulations on surface facilities associated with development. Therefore, coal mining operations could be pursued in these areas, as well as on nearby state lands.</p>
Minerals and Energy Resources	Questar Exploration & Production Company	<p>The Reasonably Foreseeable Development (RFD) analysis severely underestimates the potential oil and gas development within the planning area. The RFD was found inaccurate by industry in 2003 because it relied on outdated information and did not consider the contemporary economic climate for exploration and development of natural gas and the increased activity taking place in the PFO. Instruction Memorandum 2004-089 requires that BLM use the best available information and data at the time of the RFD study.</p> <p>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</p>	<p>Please see general comment response # 9</p>

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		the oil and gas industry to aid in the evaluation.	
Minerals and Energy Resources	Questar Exploration & Production Company	<p>BLM makes several statements throughout the Supplement to the Draft RMP/EIS indicating a belief that directional drilling will solve all the issues created by its imposition of NSO and other major surface use constraints. BLM should remember that only in certain circumstances is directional drilling economically and technically feasible. In cases where directional drilling is not economically or technically feasible, the energy resource will be lost.</p> <p>Recommendation: Rather than representing that directional drilling is to the solution to NSO and other major surface restrictions, BLM should state candidly that it may be possible to use directional drilling to access some restricted areas, but that the vast majority of NSO and other restricted areas will be unavailable for development. PFO should quantify the resulting loss of the mineral resource.</p>	The BLM recognizes that the capacity of directional drilling to avoid surface impacts is dependent on a number of variables, and that access to minerals underlying large continuous areas of with NSO stipulations may not be possible through directional drilling. The analyses in the Draft RMP/EIS and its Supplements have been revised to reflect that in the Price Field Office, variables generally limit the subsurface reach of directional drilling to approximately ½ mile from the wellhead. The analysis identifies mineral resources beyond this reach capacity as technically unrecoverable. The revised impact analyses also estimates the amount of oil and gas that would be unrecoverable under each alternative.
Minerals and Energy Resources	Shell Exploration	The Reasonable Foreseeable Development (RFD) scenarios, which project the amount of oil and natural gas exploration and development within the PFO area for each alternative, underestimates the level of activity. The Preferred Alternative D, as set forth in the July 2004 RMP, estimates 72 wells per year for 20 years. The analysis to support this estimate apparently makes no distinction between conventional oil and gas wells and associated facilities and coal bed natural gas wells and associated facilities. Additionally, considerable oil & gas exploration and development activities have occurred in the past three years since the July 2004 RMP was issued. BLM provided limited explanations supporting the assumptions used in developing the RFD scenario for each alternative in the July 2004 RMP. In contrast to the July 2004 RMP, the September 2007 RMP references the "anticipated development of 950 oil and gas wells" over the 20-year planning period. September 2007 RMP at 4-45. BLM should re-evaluate the RFD scenarios, re-estimating well numbers and related facilities and infrastructure for each alternative, based on the most recent data from industry and regulatory agencies. The agency should then clearly explain the assumptions underlying the RFD and include a more comprehensive explanation of the RFD estimating process.	Please see general comment response # 9
Minerals and Energy Resources	Theodore Roosevelt Conservation Partners	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 industrializedzone effectively committed to natural gas extraction to the exclusion of most other uses.	The BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities in some areas of the Price Field Office. As described in Appendix G of the Proposed RMP/Final EIS, timing limitation stipulations on oil and gas leasing could protect wildlife values. The goals in the Proposed RMP/Final EIS have

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			<p>been modified based on public and internal comments to specifically state the BLM's desired condition for wildlife habitat in the Price Field Office: "Maintain, protect, and enhance fish and wildlife habitats to support natural diversity and to provide healthy, self-sustaining populations of fish and wildlife species; in order to supply recreational, educational, and scientific benefits and opportunities to the public.</p> <p>Coordinate with federal, tribal, and State agencies to develop information, strategies, and plans to manage fish and wildlife habitat and facilitate the expansion and enhancement of hunting opportunities."</p>
<p>Minerals and Energy Resources</p>	<p>Uintah-Piceance Consulting</p>	<p>2. The Department of Interiors policy for developing a Reasonably Foreseeable Development Scenario (RFD) for a RMP level decision is stringent. There are several parameters that require review as well as how those parameters relate to each other. The RFD for the draft EIS is woefully inadequate to make a determination by the BLM or the Public the impact of closing 1.49 million acres to leasing (p. 4-48). The RFD should: (From BLM Handbook H-1614-1 and IM 2004-089)</p> <ul style="list-style-type: none"> - Have a detailed description of the Geology including: <ul style="list-style-type: none"> a. Subsurface stratigraphy and structure b. Reservoirs, traps, source rocks, seals, hydrocarbon generation and migration c. Summarize USGS descriptions - Past and Present Oil and Gas Exploration Activity including: <ul style="list-style-type: none"> a. Leasing activity, unit descriptions, spacing requirements for each horizon considered a common source of oil or gas, and well locations by class and type. b. Drilling and completion statistics, fields, development plans, Enhanced Oil Recovery projects. c. Horizontal and Directional drilling practices d. Oil, gas, water, condensation production by field, reservoir, operator, depth, and years. 	<p>Please see general comment response # 9</p>

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		<ul style="list-style-type: none"> e. Oil and Gas characteristics including gravity, gas quality, gas to oil ratios f. Production profile for fields and formations. Type curves for well performance g. Oil and gas prices, findings and development costs h. Gathering, processing, compression, and transmission costs i. Field operating practices including equipment. j. Gathering and Storage facilities, tank batteries, and measurement stations k. Gas transmission lines pipelines and associated capacity, compressor stations l. Gas processing facilities including capacity and intake. m. Electrical Power (lines, generators), roads n. Conflicts with other mineral development o. Gas storage fields, operations, and facilities - Oil and Gas Occurrence Potential <ul style="list-style-type: none"> a. Review of RFD's adjacent to study area b. Resources, plays, oil and gas assessments c. Map showing estimated areas of relative oil and gas occurrence potential and level of certainty d. Rationale for selecting values of occurrence potential and certainty - Oil and Gas Development Potential <ul style="list-style-type: none"> a. Proven Reserves, field outlines, wells by completion status b. Map showing estimated areas of relative oil and gas development potential and level of certainty c. Maps showing spatial distribution of estimated ultimate reserves, initial production rates, 	
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		<p>cumulative production.</p> <p>d. Rationale for selecting values of development potential and certainty</p> <p>- RFD Baseline Scenario Assumptions and Discussion</p> <p>a. Assumes all potentially productive areas are open under standard lease terms and conditions (Form 3100-11 without stipulations) except those area closed to leasing by law (Wilderness Areas, nearly all National Monuments).</p> <p>b. Graphs or tables showing forecast of exploration and development wells, and associated oil, gas, and water production rates.</p> <p>c. Assumptions made in determining the type and level of projected activity should be clearly stated and referenced to sources of information.</p> <p>d. Identify mineral estates under different ownerships and estimate amount (percent) of activity to likely occur on land under those authorities (Federal, State, and private).</p> <p>- Surface Disturbance Due to Oil and Gas Activity on All Lands</p> <p>a. Estimate surface disturbance should be based on the time and nature of each activity</p> <p>b. Estimate current surface disturbance resulting from oil and gas activity</p> <p>c. Estimate future surface disturbance for well pads, roads, and oil and gas related infrastructure that may result from projections of future activity.</p> <p>d. Estimate the staged future surface reclamation of disturbance activity</p> <p>e. Estimate total surface disturbance</p> <p>f. Estimate total net surface disturbance is equal to current disturbance plus future disturbance plus future disturbance minus future reclamation.</p> <p>g. Estimated number and type of infrastructures that may impact air quality</p> <p>h. Estimated quantity and quality of produced water disposal on the surface.</p> <p>The BLM should re-visit the RFD for the Draft RMP to allow for a better and more informed decision</p>	
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		<p>on the impacts of each Alternative (from A to E) to closing lands to oil and gas leasing and development. Each Alternative needs to be reviewed on the number of acres proposed to be closed to leasing and the number of possible wells (based on no spacing or approved State Spacing Order) as well as reserves that would not be developed for that alternative. As identified in RFD Baseline Scenario Assumptions and</p> <p>Discussion above the BLM needs to assume all potentially productive areas are open to standard lease terms and then determine the amount of reserves that might be removed from development for each alternative. The amount of loss revenues for the leasing and development both to the Federal General Fund as well to the State of Utah needs to be addressed as part of the Socio-economic impacts for each alternative. In addition to the acres proposed for no leasing for wilderness characteristics, impacts to those lands including school trust lands, proposed acreage open to leasing that might be inaccessible to development because of surrounding No Surface Occupancy (NSO) restrictions also need to be addressed for each alternative.</p>	
<p>Minerals and Energy Resources</p>	<p>Uintah-Piceance Consulting</p>	<p>3. The National Energy Policy, issued May, 2001 noted that “some Federal lands, otherwise available for leasing have been legislatively or administratively withdrawn from leasing. The Vice-Presidents National Energy Policy Development Group recommended:</p> <p>“... that the President direct the Secretary of the Interior to examine land status and lease stipulation impediments to Federal oil and gas leasing, and review and modify those where opportunities exist (consistent with the law, good environmental practice, and balanced use of other resources). Review public land withdrawals and lease stipulations, with the full public consultation, especially with the people in the region, to consider modifications where appropriate.” A “broad brush” approach to make public lands unavailable for leasing as well as impeding development on private lands within these no-lease/no surface occupancy lands violates the mandate of the National Energy Policy. The BLM should re-evaluate those lands proposed for no-lease and determine if the acreage may be reduced or if lands could be leased with stipulations that will protect the land yet allow development of this nation’s resources.</p>	<p>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.</p> <p>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</p>

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			<p>analysis.</p> <p>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.</p> <p>The Draft RMP/EIS, as supplemented, 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 Proposed RMP/Final EIS will offer BLM management the flexibility to protect resource values and uses while allowing for acceptable levels of mineral development.</p>
<p>Minerals and Energy Resources</p>	<p>Utah State Office of Education</p>	<p>Alternative E would directly harm us because “about 187,000 acres of State of Utah lands could be rendered uneconomic to lease because they would be surrounded by unleaseable federal lands.” (4-31) This includes about 19,200 acres with coal resources that are currently unleased, which would be eliminated from further consideration for coal leasing.</p>	<p>The analyses contained in the Price Draft RMP/EIS and the Wilderness Characteristics Supplement to the Draft RMP/EIS have been modified to improve the direct and cumulative impacts analysis for minerals and socioeconomics. Specifically, the following</p>

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			revisions were made: 1) an analysis of the impacts from isolating SITLA parcels due to closing adjacent BLM lands to mineral leasing, making the SITLA parcel less economical for development; 2) an analysis of the potential loss in revenue for SITLA due to isolating parcels under each alternative; 3) an analysis of impacts on property taxes, mineral lease payments, and severance taxes from implementing each alternative.
Minerals and Energy Resources	Utah State Office of Education	The BLM has stated “Oil and gas development in these areas would require directional drilling to extract hydrocarbon resources.” (4-48). Analysis should be made on how feasible this would be, and what proportion of the resources could be reached in this way.	The BLM recognizes that the capacity of directional drilling to avoid surface impacts is dependent on a number of variables, and that access to minerals underlying large continuous areas of with NSO stipulations may not be possible through directional drilling. The analyses in the Draft RMP/EIS and its Supplements have been revised to reflect that in the Price Field Office, variables generally limit the subsurface reach of directional drilling to approximately ½ mile from the wellhead. The analysis identifies mineral resources beyond this reach capacity as technically unrecoverable. The revised impact analyses also estimates the amount of oil and gas that would be unrecoverable under each alternative. The lessee (operator)in consultation with BLM ultimately decides the method of drilling.
Minerals and Energy Resources	Utah State Office of Education	BLM should re-consider whether it can impose its standards on split estate lands where it does not own the surface. This action diminishes the rights of the surface owner, whether fee or trust lands, to develop their lands in the manner they see fit. So long as the operator of an oil and gas well has obtained a satisfactory surface use agreement that can be included in its Application for Permit to Drill to the BLM, BLM should not unilaterally limit mineral development.	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

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			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).
Minerals and Energy Resources	Western Lands Services	<p>Of additional concern is that the reasonably foreseeable development scenario prepared for the Price RMP revision in 2003 was found inaccurate by industry because it relied on outdated information and didn't consider the improved economic climate for the exploration for and development of natural gas along with the increased activity taking place in the Field Office area. It was recommended that</p> <p>the BLM utilize a broader spectrum of current geologic data available from the energy industry to upgrade the RFD scenario. Since the RFD was not revised in conjunction with the SDEIS, the potential impacts of implementation of Alternative E and the other alternatives would be radically greater than projected by BLM. We recommend that the BLM reanalyze the effects of the Alternative E as well as the alternatives contained in the previously released Price Draft EIS/RMP by utilizing updated geologic data and recognizing increased exploration and development activities in the area.</p>	Please see general comment response # 9
Minerals and Energy Resources	Western Lands Services	The BLM has ignored the findings of EPCA Phase II which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10
Minerals and Energy Resources	Williams Production RMT Co.	Of additional concern is that the reasonably foreseeable development scenario prepared for the Price RMP revision in 2003 was found inaccurate by industry because it relied on outdated	Please see general comment response # 9

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Minerals and Energy Resources	Williams Production RMT Co.	In addition, BLM needs to consider the findings of EPCA Phase II which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10
OHV Route Identification	BlueRibbon Coalition	Alternative E significantly modifies the San 2003 San Rafael Route Designation Plan. BLM indicated to BRC and other OHV groups that this RMP process was not intended to do so. Frankly, many in the OHV community are very angry that the Price Office would contemplate modifying this plan, which took over 10 years to complete and has been successfully implemented, after saying they would not do so. We strongly implore the BLM not to modify the 2003 SRRDP within the RMP revision process.	The OHV area categories of open, closed and limited supersede the implementation-level identification of routes. Hence, any existing routes in a closed area must also be closed. Under Alternative E, the land use plan would close some areas to OHV use that the current plan (San Rafael RMP) designates as limited. This is to ensure consistency within the alternative and in recognition of the appropriate direction of planning decision, any route within a designated closed area was closed under Alternative E.
OHV Route Identification	BlueRibbon Coalition	Generally speaking, the Supplemental DEIS (and the DEIS) assumes and concludes that reduction of OHV use within an area will provide a beneficial result on a particular resource. However, the Supplemental DEIS fails to connect specific closures with site-specific data justifying the closure.	Chapter 4 discusses the impacts of decisions contained in Chapter 2, and does not identify whether the impacts would be a benefit or a detriment. The open, closed, and limited OHV area designations are identified in the recreation section of Chapter 2, and can affect which routes could be identified. Through its multiple use mandate, other decisions in Chapter 2 (e.g., special status species, ACECs, SRMAs, WSAs, non-WSA lands with wilderness characteristics) could effect an area's OHV designation as well as whether a specific route would be identified as open or closed to OHV use. Through the NEPA process, the BLM analyzes whether these alternative decisions would provide the

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			desired levels of protection or not.
OHV Route Identification	BlueRibbon Coalition	One other point related to this is that 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.	The BLM's "Roads and Trails Terminology Report," released under IM-2006-173, postdated the preparation and release of the Draft RMP/EIS. The Wilderness Characteristics Supplement was prepared to be consistent with the Draft RMP/EIS.
OHV Route Identification	Capital Trail Vehicle Association	Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be "no net loss" of motorized recreational opportunities with the Price RMP project.	There is no legal, regulatory, or policy requirement for the BLM to maintain the current number of miles of routes available to motorized recreationists. The Draft RMP/EIS and its supplements provides the decisionmaker a range of alternatives from which to develop the Proposed RMP and eventually the Final RMP/ROD.
OHV Route Identification	Capital Trail Vehicle Association	The site specific analysis of each road or trail to be closed must address or identify where the public would 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.	The BLM reviewed all routes prior to identification under a given alternative to determine the values adjacent to the routes and potential uses of the route. This information was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS, as well as the Proposed RMP/Final EIS.
OHV Route Identification	Capital Trail Vehicle Association	Note that some new construction may be required to accomplish a reasonable system of loops. Therefore, new construction must be included in the scope of the project.	The current and trend of motorized use was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation. The route/trail identification process is an implementation level decision. The Draft RMP/EIS addresses motorized route identification. Future implementation level decisions could address additional route/trail identification. This could include construction of new routes, following appropriate environmental review.

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OHV Route Identification	Capital Trail Vehicle Association	We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision.	All routes identified in the Draft RMP/EIS are multi-use and do not restrict the non-motorized use, but does restrict some trails to single-track users.
OHV Route Identification	Capital Trail Vehicle Association	The maps and figures are not easily understood. There are no identifiable or named features and no road and trail numbers on the maps. It is very difficult for the public to orient themselves and to interpret the proposed action for each specific road and trail. Therefore, the public cannot adequately evaluate the proposal and cannot develop comments with reference to specific roads and trails.	The maps in the Draft RMP/EIS were generated at the best practical scale to convey the decisions being made for the size of the publication. Additional information, including large-scale maps, and GIS shapefiles were available to interested parties upon request. Commentors seeking more specific detail concerning route identification exercised this option during the planning process.
OHV Route Identification	Emery County Public Lands Department	2-19 How can the plan restrict Non-motorized mechanical transportation methods to OHV routes if the routes are closed by the previous section, Off-Highway Vehicle Recreation?	Page 2-19 of the Wilderness Characteristics Supplement to the Draft RMP/EIS is limiting non-motorized mechanical transportation to the routes identified on map 2-69.
OHV Route Identification	Emery County Public Lands Department	We are disappointed to find that the PFO, in developing Alternative E, didn't recognize that the Route Designation Plan as a complete, NEPA compliant document, but chose to eliminate two hundred miles of designated routes in the WCs. Should the Final RMP/EIS not incorporate the 2003 Route Designation Plan completely, Emery County will be compelled to litigate.	The OHV area categories of open, closed and limited supersede the implementation-level identification of routes. Hence, any existing routes in a closed area must also be closed. Under Alternative E, the land use plan would close some areas to OHV use that the current plan (San Rafael RMP) designates as limited. This is to ensure consistency within the alternative and in recognition of the appropriate direction of planning decision, any route within a designated closed area was closed under Alternative E.
OHV Route Identification	Public Lands Policy Coordination	There seems to be little or no provision in the designated routes shown on Map 2-69 for motorized routes primarily used by off-highway motorcycles. The proposed management for the areas with wilderness characteristics would eliminate most of the important areas for motorcycle use.	All designated routes are open for use by off-highway motorcycles. As route designation is an implementation-level decision, the future identification and designation of specific routes for use by specific single-use user groups could be accomplished through subsequent modifications to the route network with associated environmental analysis, but without an RMP amendment.

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OHV Route Identification	Public Lands Policy Coordination	Please clarify whether OHV use would be allowed within any lands with wilderness characteristics, and if so, which areas and routes.	The supplement accurately states the number of miles of routes from the San Rafael Motorized Route Designation Plan Area that would be closed due to management to protect, preserve, and maintain wilderness characteristics in non-WSA lands with wilderness characteristics under Alternative E. The remainder of the routes from the San Rafael Motorized Route Designation Plan Area would not be located within a non-WSA land with wilderness characteristics, and would therefore not be subject to closure under Alternative E. The Proposed RMP/Final EIS has been adjusted so the analysis associated with the Proposed RMP addresses impacts from OHV use within/adjacent to the non-WSA lands with wilderness characteristics managed to protect, preserve and maintain their wilderness characteristics.
OHV Route Identification	Sage Riders Motorcycle Club	Alternative E also eliminates 250 miles of trails and roads contained in the San Rafael Travel Plan 2003. It is our understanding, from conversations with present and previous Field Office Management, that the no roads or trails would be added, nor deleted from the San Rafael Travel Plan until after the RMP had been completed.	The OHV area categories of open, closed and limited supersede the implementation-level identification of routes. Hence, any existing routes in a closed area must also be closed. Under Alternative E, the land use plan would close some areas to OHV use that the current plan (San Rafael RMP) designates as limited. This is to ensure consistency within the alternative and in recognition of the appropriate direction of planning decision, any route within a designated closed area was closed under Alternative E.
OHV Route Identification	Sage Riders Motorcycle Club	Apparently the BLM office has found a way around this directive; therefore, we oppose the deletion of the 250 miles of trails and roads as specified in Alternative E (within the San Rafael Travel Plan) and would ask that the following trails (the accumulative sum of approximately 50 miles) within the San Rafael management area be added to the OHV route designation in the RMP final and approved alternative:	The OHV area categories of open, closed and limited supersede the implementation-level identification of routes. Hence, any existing routes in a closed area must also be closed. Under Alternative E, the land use plan would close some areas to OHV use that the current plan (San Rafael RMP)

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		<p>a) VJ Trail: Located within the Temple Mountain Trail System.</p> <p>b) Purple Trail: Located within the Temple Mountain Trail System.</p> <p>c) Cottonwood Wash: Located on the east side of Highway 24.</p> <p>d) June's Bottom: Located on the Lower San Rafael Road.</p> <p>e) Bell Mine Loop: Located on the Behind Reef Road.</p> <p>f) Old county road: Located North of Hidden Splendor Mine near the currant county road.</p> <p>g) East Reef Link Route: Located between North Temple Wash and Iron Wash West of Hwy 24.</p> <p>h) Road from Hidden Splendor Mine to old mine shacks</p>	<p>designates as limited. This is to ensure consistency within the alternative and in recognition of the appropriate direction of planning decision, any route within a designated closed area was closed under Alternative E.</p>
OHV Route Identification	Sage Riders Motorcycle Club	<p>We would also ask that the Price Field Office officially designate the OHV trail system in the Chimney Rock / Humbug / Never Sweat / Lost Springs area that has been previously submitted by the SRMC.</p>	<p>Please see general comment response # 16</p>
OHV Route Identification	Western Watersheds Project, Inc.	<p>BLM has not adequately analyzed the direct, indirect and cumulative effects of the RA's road and trail network, the huge 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.</p>	<p>The BLM reviewed all routes prior to identification under a given alternative to determine the values adjacent to the routes and potential uses of the route. This information was used to develop the alternatives, and the impact analysis in chapter 4 addressed the impacts associated with the route identification. NEPA does not require analysis of each mile associated with an identified route. The impacts of the identified routes are already contained within chapter 4 of the Draft RMP/EIS, as well as the Proposed RMP/Final EIS. Chapter 4 of the Proposed RMP/Final EIS includes a discussion of impacts to wildlife from habitat fragmentation.</p> <p>Enforcing the RMP decisions is an implementation-level action. Concerning the</p>

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			impacts from OHV using routes that are closed 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 or on closed routes.
Paleontology	BlueRibbon Coalition	The DEIS 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 Supplemental DEIS (and the DEIS) however, lacks a 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 Draft DEIS to pose an unreasonable risk to those resources.	The BLM resource specialists have noted these impacts over the years at specific locations in the Price Field Office. These incidents are not publicized to avoid the identification of sensitive paleontological areas. However, while these action may occur, they are a result of individuals who are not complying with RMP prescriptions, BLM policy, or State and federal law. As a result, they are outside the scope of what is analyzable in this EIS, which analyzes the impacts of the various alternatives and not the impacts of not following the alternatives. As a result, the Proposed RMP/Final EIS has been modified to remove analyses of illegal activities. An assumption has been included to note this action in the first few pages of Chapter 4.
Process and Procedures	American Petroleum Institute	In August, 2006, the US District Court reversed BLM's dismissal of a lease sale protest filed by the Southern Utah Wilderness Alliance and other parties. The Court required BLM to prepare an additional alternative for consideration in the revision of the Price Resource Management Plan (RMP) and to review the wilderness values of non-wilderness lands in the District. However the Court did not require BLM to develop an alternative that would have the effect of eliminating mineral resource development uses on a significant portion of the public lands in the Price Field Office Planning Area.	Please see general comment response # 7
Process and Procedures	BlueRibbon Coalition	The Supplemental DEIS page 3-2, section 3.2.11.1 (Planning Area Profile) is woefully insufficient insofar as providing public and decision makers adequate information to clearly understand the Issue, it's related controversy, the choices being made and to meaningfully compare and contrast the Alternatives, let alone provide meaningful comment. NEPA adequacy requires more than referencing documents in the administrative record. The Final DEIS must provide a brief but concise description of each of the five documents listed in the second paragraph under section 3.2.11.1: Detailed information about non-WSA lands with wilderness characteristics is part of the administrative record for the RMP. The following records are available for public review at the PFO: 1) 1999 Utah Wilderness Inventory; 2) 1999 Utah Wilderness Inventory Revision Document for the	Section 3.2.11.1 of Chapter 3 in the Wilderness Characteristics Supplement has been modified to include a brief description of each of the documents listed.

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		<p>PFO; 3) 1999 Utah Wilderness Inventory Case Files for the PFO; 4) Reasonable Probability Determinations for the PFO; and 5) Documentation of Wilderness Characteristics Review for the PFO.</p>	
<p>Process and Procedures</p>	<p>BlueRibbon Coalition</p>	<p>The present range of alternatives is fatally flawed. The addition of the Alternative E inappropriately 'tilts' the range of Alternatives. As USA-ALL's previous comments stated, all of the 4 action alternatives developed for the DEIS significantly reduced recreational access, especially motorized recreation. This is in spite of the fact that both USA-ALL and the Price BLM's own AMS noted the increase in popularity of OHV recreation. The agency's OHV Strategy clearly acknowledges that OHV use is an appropriate use of public lands and it carries with it a high degree of socio economic value. Yet, despite this and other substantive public comment, the agency failed to formulate an alternative the adequately meets the need for current and future demand for OHV recreation. The addition of Alternative E compounds this error by drastically changing the range of management options. BRC's members are negatively affected as a result.</p>	<p>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.</p> <p>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 with wilderness characteristics, 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.</p>

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			The BLM, in developing the Proposed RMP/Final EIS, can chose management actions from within the range of the alternatives presented in the Draft RMP/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.
Process and Procedures	BlueRibbon Coalition	The Alternatives are not presented in a fashion that allows sufficient public involvement and participation. The Supplemental DEIS fails to accurately disclose the differences in the various alternatives. Generally speaking, one must attempt to review and integrate the difference between alternatives A,B,C,D and E on the RMP and Alternatives A,B,C,D and E on the Travel Plan. The public cannot reasonably understand the key difference between them and meaningfully participate.	The impacts analysis in the Proposed RMP/Final EIS has been modified to improve the readability and comparison of the variation in impacts.
Process and Procedures	BlueRibbon Coalition	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 route identification maps in the Proposed RMP/Final EIS identify what are BLM system roads or County roads, which are separate from what is an OHV identified route.
Process and Procedures	Capital Trail Vehicle Assocaition	Our comments document that the current management trend towards massive motorized closures (25 to 75% of the existing routes) is not responsible to the public's needs for motorized access and recreation and is contrary to the multiple-use management directives specified by congress.	The BLM considered a range of alternatives that considers closure of between 138,000 acres (6%) to 1,520,000 acres (61%) of the Price Field Office to OHV use. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of motorized access and recreation. The areas proposed for closure are responsive to the issues raised during the scoping period early in the planning process.
Process and Procedures	Capital Trail Vehicle Assocaition	The proposed action must meet the needs of motorized recreationists both today and tomorrow. We respectfully request that the evaluation and proposal be directed to adequately address these issues and goals.	The current use and projected trend of OHV recreation was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.
Process and Procedures	Capital Trail Vehicle Assocaition	The project has a critical flaw which is the lack of a true "pro-recreation" alternative that adequately addresses motorized recreation. All of the alternatives developed for consideration represent a significant reduction in routes available for motorized use. Not one Alternative even sustains the current opportunity.	BLM has provided a reasonable range of alternatives. As required by NEPA, the Draft RMP/EIS analyzes the current management (No Action Alternative). Each alternative, represents an alternative means of satisfying the identified purpose and need, and of

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			resolving issues. The range of alternatives began early in the RMP process starting with the public scoping period and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period.
Process and Procedures	Capital Trail Vehicle Association	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 opportunities in the project area.	The No Action Alternative addresses sustaining the current management and opportunities throughout the decision area. This includes managing OHV use on more than 30% of the decision area as open to cross country OHV use with over 64% of the decision area limited to designated use.
Process and Procedures	Capital Trail Vehicle Association	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 effects 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.	Cumulative impacts to motorized recreation opportunities have been clarified in the Proposed RMP/Final EIS.
Process and Procedures	Capital Trail Vehicle Association	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 an alternative other than No Action must be built around it.	The No Action Alternative addresses sustaining the current management and opportunities throughout the Price Field Office. This includes managing OHV use on more than 30% of the decision area as open to cross country OHV use with over 64% of the decision area limited to designated use. Neither NEPA nor FLPMA requires an alternative or specific use be propagated through multiple alternatives, but that all reasonable alternatives be considered. The No Action Alternative is fully analyzed in the Draft RMP/EIS and the Proposed RMP/Final EIS.
Process and Procedures	Capital Trail Vehicle Association	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 Proposed RMP/Final EIS was clarified in respect to the difference between implementation and land use plan level decisions.
Process and Procedures	Capital Trail Vehicle Association	We are concerned that many of the restrictions in all of the Action Alternatives are simply not justified. The FEIS should clearly draw a connection between the facts on the ground and the decision made.	CEQ regulations implementing the National Environmental Policy Act (NEPA) require agencies evaluating effects on the human environment in an environmental impact statement (EIS) to identify incomplete or

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			unavailable information, if that information is essential to a reasoned choice among alternatives (43 CFR 1502.22). As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available.
Process and Procedures	Capital Trail Vehicle Association	Note that the Price RMP project area includes many important RS 2477 routes. We request that this planning project include adequate research of the county records and adequate formal consultation and coordination with the county to get their input on RS 2477 routes.	Please see general comment response # 8
Process and Procedures	Capital Trail Vehicle Association	The plan for this project area does not recognize and address this trend. The management plan for the Price RMP project area must adequately recognize and address this trend. The national planning policy does not recognize and address this trend.	The current use and projected trend of OHV recreation was considered during the planning process. The range of alternatives addresses the projected increase in motorized recreation.
Process and Procedures	Capital Trail Vehicle Association	The agency must develop a true No Action alternative in compliance with NEPA and other planning regulations. The agency must formulate a lawful “No Action” alternative so that the public and decision makers may reasonably compare and contrast other management alternatives. Under the existing conditions motorized recreationists have a reasonable number of choices and variation of opportunities. Under most proposed conditions, motorized recreationists have a significantly reduced number and variety of opportunities.	The No Action Alternative addresses sustaining the current management and opportunities throughout the decision area. This includes managing OHV use on more than 30% of the decision area as open to cross country OHV use with over 64% of the decision area limited to designated use.
Process and Procedures	Capital Trail Vehicle Association	A significant closing of roads and motorized trails in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657.	The BLM considered a range of alternatives that considers closure of between 138,000 acres (6%) to 1,520,000 acres (61%) of the Price Field Office to OHV use, while allowing OHV use along between 573 miles and 3,210 miles of designated routes. The Proposed RMP/Final EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of motorized access and recreation. The areas proposed for closure are responsive to the issues raised during the scoping period early in the planning process, as are the routes that are designated for continued use.
Process and Procedures	Capital Trail Vehicle Association	We request the full and fair disclosure of this information to the public. The starting benchmark could be considered deceptive. NEPA requires adequate disclosure of the potential impacts of a proposed action as stated in CEQ Sec. 1500.1 Purpose. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. It shall provide full and fair discussion of significant environmental impacts and shall inform	The best available route information was used as a starting point for identifying routes/trails. In addition, to the route inventory, routes identified during the public scoping and public comment period were

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		decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies shall focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data. Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses. These requirements have not been met. We request that these deficiencies be addressed by developing a starting benchmark alternative that identifies all of the existing roads and trails available to motorized recreationists including non-system routes and those falling under some undefined definition of “unusable” and those additional routes required to meet the needs of the public.	integrated into the baseline route inventory and will be considered in preparing the Proposed RMP/Final EIS.
Process and Procedures	Capital Trail Vehicle Association	We request that the environmental document adequately addresses the social, economic, and environmental justice issues associated with multiple-use access and motorized recreation. We request that the environmental document include a travel management alternative for the project area that adequately responds to these issues and the needs for multiple-use access and recreation.	The BLM considered a range of alternatives that considers closure of between 138,000 acres (6%) to 1,520,000 acres (61%) of the Price Field Office to OHV use, while allowing OHV use along between 573 miles and 3,210 miles of designated routes. The Proposed RMP/Final EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of motorized access and recreation. The areas proposed for closure are responsive to the issues raised during the scoping period early in the planning process, as are the routes that are designated for continued use.
Process and Procedures	Colorado Plateau Archaeological Alliance	There is ongoing concern that some BLM field offices, including PFO, have systematically precluded public participation in the Section 106 review process, with the caveat that the public has ample opportunities to comment through provisions of the National Environmental Policy Act (Gubbins 2006 and Stringer 2006, see also identical letters denying consulting party status to the Southern Utah Wilderness Alliance and the National Trust for Historic Preservation). CPAA believes that federal regulations are explicit, that federal agencies shall “seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties,” as defined in 36 CFR 800.2(d)(1). It is therefore recommended: The EIS should clearly state the intent of the agency to comply with public participation provisions of Section 106 of the National Historic Preservation Act, in addition to provisions for public comment through NEPA. Such participation is at the heart of the National Historic Preservation Act.	The BLM clearly intends to comply with the provisions of Section 106 related to public participation. It is BLM's position that the public is afforded ample opportunity to comply through the NEPA process and that a separate public participation process is not necessary.
Process and Procedures	ConocoPhillips Company	While COPC recognizes the need for the additional alternative for consideration in the revision of the Price Resource Management Plan (RMP) due to a US District Court decision, we do not believe the alternative is required to be this restrictive to nearly all lands within the Price Field Office.	Please see general comment response # 7
Process and Procedures	ConocoPhillips Company	Furthermore, how will BLM address existing rights-of-way under RS 2477?	Please see general comment response # 8
Process and	Discovery	While the BLM was required to review the wilderness values of non-wilderness lands, the court did	Please see general comment response # 7

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Procedures	Exploration Inc.	not require the ELM to develop an alternative that would essentially eliminate all multiple uses of public lands in the Price FO.	
Process and Procedures	Emery County Public Lands Department	<p>The level of restriction placed in the plan as identified above from section 2-12 is beyond the scope of the intended planning process for the RMP. The “activity level” decision making process is completely abandoned in this alternative and the plan removes the necessary flexibility for BLM land managers in the future. As an example, the exclusion of all ROWs is absurd. There is a well known, proposed national energy corridor that has been proposed for the corridor between Green River and Price Utah. The Desolation Canyon area as proposed could have significant impact on such a proposal. This project, if it progresses, would have its own NEPA based process and should not be automatically excluded from consideration just because it has been flagged as an area with wilderness qualities.</p> <p>Another example is the designation to close the area to oil and gas leasing. The Lost Springs area is one that already has current, active permits and applications for exploratory drilling. To automatically exclude the property without a full analysis of the mineral potential of the area is not in keeping with the agencies mandates.</p>	The prescription for management of non-WSA lands with wilderness characteristics contained on page 2-12 of the wilderness characteristics supplement were generated to provide the maximum preservation of these areas.
Process and Procedures	Emery County Public Lands Department	First of all, the section concerning ERMA areas addresses management practices and signing options that are outside of the proposed areas. Why even address large group sites like Price Recreation Area that are no where near the proposed areas?	An Extensive Recreation Management Area (ERMA) includes all lands within the Price Field Office that are not part of a SRMA. Therefore, the prescriptions described on page 2-18 of the Wilderness Characteristics Supplement apply to areas that are within the Price ERMA.
Process and Procedures	EOG Resources Inc.	<p>EOG contends that by categorizing the area surrounding its existing state leases as "closed to leasing is a waste of the oil and gas resources. Management guidance contained in Alternative E ignores the high oil and gas potential of much of the planning area and is thereby not consistent with the Energy Policy and Conservation Act</p> <p>Reauthorization of 2000 and the Energy Policy Act of 2005.</p>	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.

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			<p>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 lands with wilderness characteristics, 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.</p> <p>The BLM, in developing the Proposed RMP/Final EIS, can chose management actions from within the range of the alternatives presented in the Draft RMP/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.</p>
Process and Procedures	Fidelity Exploration and Production Co.	BLM reviewed the wilderness values of non-wilderness lands for the Price Field Office planning area and subsequently prepared an additional alternative for consideration in the DEIS. The resultant Alternative E is unreasonably restrictive without cause and would essentially eliminate all multiple uses of public lands in the Price FO planning area.	Please see general comment response # 7
Process and Procedures	Hopi Cultural Preservation Office	In numerous letters, we objected to BLM IM 98-131-2, which prohibited reburial on BLM Lands of Native American human remains and funerary objects excavated from BLM lands. Therefore, we appreciate the efforts of Garth Portillo and others who have assisted in the development of IM 07-	The issue of reburial is outside the scope of the land use plan. According to IM 2007-002, this issue is authorized on a case-by-case

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		002, which partially reverses that policy. However, we continue to object to the BLM's policy that excludes the reburial-of the large number of NAGPRA materials housed in BLM museum collections.	basis.
Process and Procedures	Hopi Cultural Preservation Office	A purpose of the DRMP/DEIS is to "Resolve multiple-use conflicts or issues between resource values and resource uses." Alternative D, the Preferred Alternative, is supposed to provide for a wide variety of resources needs throughout the PFO by allowing for mineral development, recreational opportunities, and other uses in an environmentally appropriate manner. This alternative continues the BLM practice of co-mingling incompatible uses, such as cultural and natural resources protection and energy development. This balance is not sustainable, and Alternative D does not resolve the stated purpose of the DRMP/DEIS.	The term "multiple use" as defined in the 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 Draft RMP/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 Proposed RMP/Final EIS will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
Process and Procedures	Independent Petroleum Association of Mountain States (IPAMS)	No legal or regulatory mandate exists for prohibiting multiple use activities in ACEC, SRMAs, and Wild and Scenic Rivers areas. BLM has apparently arbitrarily restricted other multiple use activities in the ACEC and WSR areas (Chapter 2-Alternative E) without any regulatory and technical basis for doing so. Supporting documentation should be available for each area and segment.	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 areas identified by the commentor are tools the BLM can use to manage very specific resources, values and/or uses in a specific manner without having to manage the entire Price Field Office in a similar manner. ACECs and wild and scenic rivers are managed specifically to protect their R&I values or ORVs and tentative classifications, respectively. SMRAs are identified in areas where additional management is needed to ensure recreation opportunities and

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			experiences are managed in a sustainable manner while protecting other natural resources. The Proposed RMP/Final EIS contains appendices associated with the review and/or management of all three management tools the commentor identifies.
Process and Procedures	Public Lands Advocacy	We recognize BLM prepared an additional alternative for consideration in the revision of the Price Resource Management Plan (RMP) due to the US District Court's decision. However, while BLM was required to review the wilderness values of non-wilderness lands, the court did not require BLM to develop an alternative that would essentially eliminate all multiple uses of public lands in the PFO.	Please see general comment response # 7
Process and Procedures	Public Lands Advocacy	We find no acknowledgement in the DEIS of valid existing rights associated with RS 2477 rights-of-way claimed by the State of Utah.	Please see general comment response # 8
Process and Procedures	Public Lands Policy Coordination	The state believes that cumulative impacts should take into consideration all reasonably foreseeable actions in the other BLM planning areas.	The cumulative impacts analysis section of Chapter 4 in the Draft RMP/EIS has been modified to the extent practical to include the impacts from management of all adjacent BLM lands, including those undergoing planning updates.
Process and Procedures	Public Lands Policy Coordination	Alternative E does not directly examine split-estate lands where the subsurface mineral estate is managed by the BLM but the surface is owned by another party (i.e. SITLA). BLM should re-consider whether it can impose its standards on split estate lands where it does not own the surface.	Information regarding leasing and development on split estate lands is found at the following Washington Office website: www.blm.gov/bmp/Split_Estate.htm . Instruction Memorandum No. 2003-202 outlines the policy, procedures and conditions for approving oil and gas operations on split-estate lands. In particular, the BLM will not consider 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

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			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).
Process and Procedures	Shell Exploration	The July 2004 RMP contains tables comparing "alternatives for key issues." See July 2004 RMP at ES-8 and ES-9. The September 2007 RMP does not update and expand these tables in light of Alternative E.	The Executive Summary of the Proposed RMP/Final EIS has been revised to include the addition of Alternative E to the comparison of all alternatives.
Process and Procedures	Shell Exploration	No legal or regulatory mandate exists for prohibiting multiple use activities in Areas of Critical Environmental Concern ("ACECs"), Wild and Scenic Rivers areas ("WSRs"), and Special Recreation Management Areas (SRMAs). BLM has apparently arbitrarily restricted other multiple use activities in the ACEC, WSR and SRMA areas [Chapter 2-Alternative E) without explaining the regulatory and technical basis for a designation of these special areas and for blanket exclusion of other multiple use activities.	The term "multiple use" as defined in the 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 Draft RMP/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 Proposed RMP/Final EIS will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
Process and Procedures	The Wilderness Society	In order to comply with NEPA, the Supplement should acknowledge the many values of lands with wilderness characteristics and fully address the benefits to the other resources of the public lands from protecting them. This is also consistent with FLPMA's directive that the BLM manage the public lands for multiple use and for sustained yield, as well as with the NHPA and applicable agency	The Supplement to the Price Field Office Draft RMP/EIS for Non-WSA Lands with Wilderness Characteristics includes analysis on the impact that managing non-WSA lands

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		<p>policies. In addition, the BLM should comply with its obligations under IM 2007-030 for addressing cultural resources in travel planning.</p>	<p>for wilderness characteristics can have in protecting a wide variety of resources and resource uses, as well as the impact of excluding certain uses from these areas as well. The Proposed RMP/Final EIS also includes these analyses, as well as the protective impacts associated with managing non-WSA areas to protect, preserve, and maintain wilderness characteristics in the Proposed RMP.</p>
<p>Process and Procedures</p>	<p>The Wilderness Society</p>	<p>The Supplement does not provide sufficient basis for comparisons with the other management alternatives:</p> <p>The Supplement provides changes to each affected section of the Draft RMP/EIS for Alternative E. However, there are no thorough discussions or comparisons of the effects of Alternative E with the preferred alternative, Alternative A. For instance, a side-by-side comparison of the mileage of ORV routes, projected oil and gas wells and functional habitat in Alternative E and the other management alternatives is critical information for informed public scrutiny of this document. As a Supplement, this document should permit review and comment without a complete re-reading of the Draft RMP/EIS. The original Draft RMP/EIS did not address the crucial issue of protecting lands with wilderness characteristics; the BLM is obligated to provide this Supplement to remedy the omission and cannot place an unreasonable burden on the public in order to review it. See, e.g., 40 C.F.R. § 1502.9. It is the BLM’s obligation under NEPA to “make diligent efforts to involve the public in preparing and implementing their NEPA procedures.” 40 C.F.R. § 1506.6(a). This Supplement does not meet this obligation.</p> <p>In addition, calculation and comparison of the mileage of ORV routes and functional habitat does not appear at all in the Supplement the Draft RMP. These are important metrics for the BLM to consider in order to fulfill its obligations to evaluate the direct, indirect and cumulative impacts, in terms of both costs and benefits, of Alternative E and the other management alternatives. Route mileage is presented in the other RMPs currently being revised by the Utah BLM, including the Supplement prepared by the Vernal Field Office. See, e.g., Vernal Supplement, p. S-3. The Vernal Supplement also presents detailed information on habitat fragmentation from oil and gas development, including measurements of route density and percent of the area outside three functional habitat loss zones. Vernal Supplement, pp. 4-128 – 4-130. Without this information, not only the public, but also the agency is deprived of the opportunity to make an informed decision.</p>	<p>The analysis in the Draft RMP/EIS was structured to allow the reader to see the differences in impacts across alternatives without specifically including such statements of comparison. As the Non-WSA Lands with Wilderness Characteristics Supplement is simply an extension of the Draft RMP/EIS, it was structured in a similar fashion to avoid confusion when comparing back to the other alternatives. The supplement document was intended to be read as part of the Draft RMP/EIS and not as a stand alone document. The original Draft RMP/EIS did consider impacts to the non-WSA lands with wilderness characteristics, and indirect protection to them, but no alternative included management specifically to protect, preserve, and maintain wilderness characteristics, as is the case in Alternative E. The Supplement also includes miles of routes in each area of non-WSA lands with wilderness characteristics, as described for each alternative in Table 4-2 of the Supplement. Impacts from fragmentation are addressed in both the Draft RMP/EIS, Supplement, and revised it the Proposed RMP/Final EIS, but are addressed in a qualitative manner.</p>

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		<p>Recommendations: In order to facilitate meaningful public participation and review of the Supplement, the BLM must provide a comparison of the effects of Alternative E and other management alternatives. In addition, the BLM must provide data on the mileage of designated ORV routes and the amount of habitat fragmentation in all alternatives, in order to fully assess the impacts of the alternatives.</p>	<p>The revised format for the impacts analysis in the Proposed RMP/Final EIS includes increased references of comparison to other alternatives, as well as a side-by-side summary of impacts at the end of Chapter 2. This includes addressing comparisons of impacts from mineral development and route designation.</p>
<p>Process and Procedures</p>	<p>The Wilderness Society</p>	<p>The BLM is not considering a true range of alternatives:</p> <p>The Supplement presents a new Alternative E, which would manage all of the lands with wilderness characteristics outside WSAs that have been identified by the BLM. However, none of the other management alternatives include specific management of these areas to protect their wilderness characteristics. The Supplement could have, but does not, present a range of alternatives, such that each alternative would include an option for managing non-WSA lands with wilderness characteristics. Instead, the approach taken in the Supplement implies that the agency has no intention of adopting Alternative E and is taking an “all or nothing” approach to managing non-WSA lands to protect their wilderness characteristics. The Supplement appears to up Alternative E as a “straw man” to be dismissed in favor of the preferred alternative.</p>	<p>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.</p> <p>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</p>

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			<p>contained comparable protections of the Non-WSA lands with wilderness characteristics, the alternatives would have substantially similar consequences and would not be significantly distinguishable.</p> <p>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.</p>
Process and Procedures	The Wilderness Society	<p>The Supplement underestimates the impacts on wilderness characteristics by incorrectly limiting the acreage considered:</p> <p>In addition to limiting public participation and limiting the range of alternatives, the failure to recognize the wilderness characteristics of all of the lands with wilderness characteristics outside WSAs has also compromised the Supplement's and the DEIS' analysis of impacts from the various alternatives, including Alternative E. As discussed above, BLM is required to assess and disclose the impacts of management decisions on wilderness characteristics; and this analysis must use accurate data and acceptable methods. However, because the BLM does not acknowledge the wilderness characteristics of more than 140,000 acres of the areas proposed for protection, the Supplement and the DEIS fail to assess the impacts of activities such as oil and gas development and ORVs in the management alternatives on those same values and also cannot accurately assess the benefits to resources such as wildlife habitat and cultural resources from protecting these lands.</p> <p>Recommendations: As a first step, the BLM must correct its criteria for evaluating lands with wilderness characteristics as described above and reassess the application of those criteria to the proposals submitted by the public. The BLM must then conduct a NEPA analysis of the direct, indirect and cumulative impacts of the management alternatives on the lands with wilderness characteristics and provide the public with an opportunity to comment on this analysis prior to issuing the Proposed RMP/Final EIS, so that this information can be taken into account in developing the final RMP.</p>	<p>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 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. Impacts to both the non-WSA lands with wilderness characteristics and the remaining areas identified as not having wilderness characteristics are described in Chapter 4 of the Proposed RMP/Final EIS.</p>
Process and Procedures	Theodore Roosevelt Conservation	<p>Theodore Roosevelt Conservation Partnership asks that the comment period be extended at least an additional 90 days to ensure that adequate time is provided for sportsmen to be involved in this</p>	<p>The BLM provided the public with 90 days to review and comment on the Draft RMP/EIS,</p>

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	Partners	pivotal public process.	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 Draft RMP/EIS. The BLM made the Draft RMP/EIS available, free of charge to the public, in a variety of mediums, including paper, CD, and online. In addition, the BLM staff has offered to meet individually with groups or individuals to explain the Draft RMP/EIS and help focus review and comment efforts.
Process and Procedures	Theodore Roosevelt Conservation Partners	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.	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 analysis.
Process and Procedures	Theodore Roosevelt Conservation Partners	The BLM should detail in the Price RMP how public lands proposed for leasing and development within the Price resource area will be managed for a balance of uses, as required by the Federal Land Policy and Management Act (FLPMA). FLPMA sets forth a multiple-use mandate that federal agencies may not ignore. With regards to energy development in the Price field office, 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, trout, and sage-grouse in determining appropriate natural gas extraction management.	The BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. As described in Appendix G of the Proposed RMP/Final EIS, timing limitation stipulations on oil and gas leasing could protect wildlife values. BLM coordinates with the Utah Division of Wildlife Resources (UDWR) in the management of wildlife habitat to help ensure that UDWR management goals are being addressed. This coordination includes determination of the appropriate big game

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			herd numbers to ensure that range conditions meet the Standards for Rangeland Health and forage production for livestock is not decreased.
Process and Procedures	U.S. Environmental Protection Agency	EPA is particularly interested in the cumulative impacts from all reasonably foreseeable development, air quality impact analysis including long-range protection of visibility, habitat impact analysis particularly from invasive non-native species, and mitigation for all resources which might be improved through curtailing activities during severe drought.	The impact analyses of the Proposed RMP/Final EIS, including the cumulative impacts section, has been adjusted to include increased analysis of air quality impacts, as well as impacts from more restrictive management associated with Alternative E. Section 2.7.11 from the Draft RMP/EIS (Fire, Drought, Natural Disasters) has been retained in the Proposed RMP/Final EIS to address the need for and potential adjustments in land uses during drought while the RMP is being implemented.
Process and Procedures	Union Telephone Company	Although the BLM is subject to numerous federal statutes and guidelines on the siting of wireless communications infrastructure, it fails to acknowledge these authorities in the Price Draft RMP/EIS.	BLM complies with all laws, policy and regulation when making land use plan decisions. The Draft RMP/EIS does not attempt to provide an exhaustive list of the laws, policies, or regulations that apply to BLM's management of federal lands, nor is such a list required to ensure compliance with legal, regulatory, or policy direction.
Process and Procedures	Utah Farm Bureau Federation	Farm Bureau is opposed to the BLM's use of the RMP process to retain federal ownership of the federal lands in violation of the equal footing doctrine of the U.S. Constitution and other pertinent federal law, including FLPMA.	Section 102(a)(1) of FLPMA states: "Congress declares that it is the policy of the United States that 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." The land tenure adjustment criteria is listed on pages 2-18 through 2-20 of the Draft RMP/EIS. Public lands must meet one or more of the criteria to be considered for any form of land tenure adjustment. The RMP process is mandated by Federal law, specifically FLPMA. In addition, Appendix 11

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			of the Draft RMP/EIS includes a list of lands designation for potential disposal via FLPMA Section 203 sale.
Process and Procedures	Utah State Office of Education	The BLM has an obligation to include in its planning an effective and timely means of addressing the impact of federal land actions on inheld state trust lands.	The analyses contained in the Price Draft RMP/EIS and the Wilderness Characteristics Supplement to the Draft RMP/EIS have been modified to improve the direct and cumulative impacts analysis for minerals and socioeconomics. Specifically, an analysis of impacts to SITLA lands was included in the Proposed RMP/Final EIS.
Process and Procedures	Wasatch Mountain Club	We think that there must be a new preferred alternative since the current one was drafted without consideration of the issues addressed in the additional alternative. A new preferred alternative is needed that considers and incorporates this new information. We believe that if a new preferred alternative is not forthcoming, then the addition of the new alternative was done only for window dressing and that the values included in non-WSA lands and dispersed non-motorized recreation are not seriously evaluated by the BLM.	The Proposed RMP has been modified from the Draft RMP/EIS preferred alternative based on extensive public comment, clarified resource information and analysis, and changes in BLM policies. In developing the Proposed RMP and Final RMP/ROD, the decisionmaker can choose from any of the decisions in any of the alternatives presented in the Draft RMP/EIS and its supplements.
Process and Procedures	Wasatch Mountain Club	Restrictions on dispersed camping and backcountry travel are found in this alternative that are not found in any other alternative. I do agree that for resource protection and long term improvement in non-WSA and WSA lands that these sorts of restrictions will become necessary. I find it interesting that they are not found in other alternatives. It seems that the BLM wants to add a poison pill to preservation in that additional restrictions will be applied to an alternative that would be most attractive to non-motorized users.	Alternative E does not propose any new restrictions on non-mechanized use beyond what is described in Alternative C of the Draft RMP/EIS.
Process and Procedures	Western Lands Services	While the BLM was required to review the wilderness values of non-wilderness lands, the court did not require the ELM to develop an alternative that would essentially eliminate all multiple uses of public lands in the Price FO.	Please see general comment response # 7
Process and Procedures	Western Watersheds Project, Inc.	We note that, in particular, livestock grazing is not analyzed in a range of alternatives (DEIS 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.	An alternative that proposes to close the entire planning area to grazing would not meet the purpose and need of this Proposed RMP/Final EIS. NEPA requires that agencies study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources. No issues or conflicts have been identified during this land use planning effort which requires the

			<p>complete elimination of grazing within the planning area for their resolution. Closures and adjustments to livestock use have been incorporated into the alternatives on an allotment or area basis to address issues identified in the LUP (land use plan). Since the BLM has considerable discretion, through its grazing regulations, to determine and adjust stock levels, seasons-of-use, and grazing management activities, and to allocate forage to uses of the public lands in LUPs, the analysis of an alternative to entirely eliminate grazing is not needed.</p> <p>An alternative that proposes to close the entire planning area to grazing was considered by the BLM ID Team, as described in section 2.2.7 of the Proposed RMP/Final EIS, as was an alternative that would make other adjustments to livestock grazing beyond what is considered in the alternatives. Closing the Price Field Office to livestock grazing would be inconsistent with the intent of the Taylor Grazing Act which directs the BLM to provide for livestock use of BLM lands, to adequately safeguard grazing privileges, to provide for the orderly use, improvement, and development of the range, and to stabilize the livestock industry dependent upon the public range.</p> <p>FLPMA requires that public lands be managed on a "multiple use and sustained yield basis" (FLPMA Sec. 302(a) and Sec. 102(7)) and includes livestock grazing as a principal or major use of public lands. While</p>
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			multiple use does not require that all lands be used for livestock grazing complete removal of livestock grazing on the entire planning area would be arbitrary and would not meet the principle of multiple use and sustained yield.
Process and Procedures	Western Watersheds Project, Inc.	The DEIS failed to analyze the role and values of predators in controlling rodent populations and fulfilling their role in a healthy ecosystem.	The role and values of predators in controlling rodent populations is outside the scope of the Draft RMP/EIS.
Process and Procedures	Western Watersheds Project, Inc.	The DEIS does not present an allotment by allotment summary of current monitoring information that describes the trend or condition as compared to the existing 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?	Evaluation and adjustment of grazing management practices (i.e. stocking rates, season of use, changes in livestock kind) for individual or groups of allotments is beyond the scope of this RMP and will be addressed at the implementation stage (see BLM Handbook 1601 Appendix C page 14). Determining the condition of the range and its carrying capacity during the grazing permit renewal process is standard protocol. All reasonably available monitoring data is analyzed to make any necessary management changes to provide for the sustained yield and responsible use of the public lands prior to the permit renewal. Price FO will monitor range condition and adjust grazing management practices for specific allotments to meet the Standards for Rangeland Health as noted in 43 CFR 4180. Price FO has an approved ecology-based monitoring plan for data collection and analysis to determine conformance with existing LUP goals and objectives. The monitoring plan conforms to manual requirements and is subject to changes as new data are assimilated.
Process and Procedures	Western Watersheds Project, Inc.	The Price 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.	The BLM considered a range of alternatives that considers closure of between 138,000 acres (6%) to 1,520,000 acres (61%) of the Price Field Office to OHV use, while allowing OHV use along between 573 miles and 3,210

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			<p>miles of designated routes. The Proposed RMP/Final EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of motorized access and recreation. The areas proposed for closure are responsive to the issues raised during the scoping period early in the planning process, as are the routes that are designated for continued use.</p> <p>The BLM is required by FLPMA to manage the public lands according to multiple use standards. The term "multiple use" as defined in FLMPA means "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." This direction indicates that not all uses need to be accommodated in all areas. The alternatives in the Draft RMP/EIS reflect this provision. Not all areas would be open to all types of uses in the planning area. Additionally, not all areas would be open to uses in the same timeframe. Management actions for all resources are provided in the alternatives, including those that provide protection of sensitive resources.</p>
<p>Process and Procedures</p>	<p>Western Watersheds Project, Inc.</p>	<p>BLM must review all this information in its analysis in order to meet its obligation under NEPA to take a "hard look" at the effects of its actions.</p>	<p>NEPA does not require an agency to include every piece of research supporting or opposing the analysis in an EIS. The BLM has incorporated an array of technical and scientific research, as well as the professional expertise of the BLM's ID Team members, to develop the alternatives and perform the impact analysis. Unless the commentator identifies specific deficiencies in the Draft RMP/EIS analysis, the BLM is not</p>

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			obligated to incorporate the variety of references into the Proposed RMP/Final EIS.
Process and Procedures	Western Watersheds Project, Inc.	There was no meaningful analysis of the benefits of roadless areas (WSA, Wilderness, potential, conservation/refugia, research natural areas) to wildlife, and how those benefits to wildlife will be diminished by the visual and sound presence of these machines across the landscape.	Section 4.2.7 and 4.2.8 of the Price Proposed RMP/Final EIS have been revised and clarified to improve the impacts to special status species and fish and wildlife habitats (respectively) from restrictive management on maintaining habitats and reducing fragmentation.
Process and Procedures	Williams Production RMT Co.	We recognize BLM prepared an additional alternative for consideration in the revision of the Price Resource Management Plan (RMP) due to a US District Court decision. However, while BLM was required to review the wilderness values of non-wilderness lands, the court did not require BLM to develop an alternative that would essentially eliminate all multiple uses of public lands in the Price FO.	Please see general comment response # 7
Recreation	BlueRibbon Coalition	The SEIS notes: This alternative would create a major shift in recreation opportunity from motorized to primitive recreation. This change from motorized to non-motorized use would be mostly within SRMAs; While this statement may be technically accurate, it also misrepresents the guidance in BLM's planning handbook. It also does not assist the public and decision makers to compare and contrast impacts of Alt. E. Because BLM's planning guidance requires ERMA's to provide only custodial recreation management, most, if not all, motorized recreation occurs in SRMA's. To be accurate, and to properly assist the public understand the consequences of the decisions, the statement should read: This alternative would create a major shift in recreation opportunity from motorized to primitive recreation across the Field Office.	The commentor is incorrect in assuming that because ERMA management is custodial in nature that "most, if not all, motorized recreation occurs in SRMAs." There are hundreds of miles of designated routes in the Price ERMA that provide extensive motorized recreation opportunities. The statement of impact being focused in SRMAs is a function of the spatial similarities (e.g., overlap) between the SRMAs and many of the non-WSA lands with wilderness characteristics. Additionally, the Supplement notes that the "change from motorized to non-motorized use would be mostly within the SRMAs, of which Desolation Canyon and San Rafael are the largest." Under Alternative E, those two SRMAs comprise almost 50% of the Price Field Office. The analysis sufficiently identifies the extent to which motorized recreation opportunities could be lost.
Recreation	BlueRibbon Coalition	The Supplemental DEIS fails to disclose the impacts to camping We did not notice a analysis of the miles of motorized trails, campsites or mountain bike routes closed under Alt. E. this seems to be a fundamental flaw and we formally request the agency quantify, as best as possible, the impacts to these important and popular resources.	The Proposed RMP/Final EIS has been modified to include the number of miles that will be open under Alternative E, as well as the number of miles that would not be open compared to other alternatives. The identification of specific campsites or

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			mountain bike routes are activity-level decisions that will be completed during implementation of the RMP. Identification of such site-specific features is outside the scope of this RMP effort. As noted in the Supplement, under Alternative E non-motorized mechanical transportation methods would be limited to OHV designated routes. Again, the Supplement notes that based on current trends, Alternative E "would not meet the recreational demand and the quality of recreational opportunities for these activities would decline" (Non-WSA Lands with Wilderness Characteristics Supplement, page 4-40).
Recreation	BlueRibbon Coalition	On page 2-15, under "recreation," it reads: Recreation Opportunity Spectrum (ROS) • Within SRMAs, manage for recreation activities, settings, and experiences, as identified in the Special Recreation Management Area (Recreation Opportunity Spectrum) Map 2-61 (see Appendix 15 [in DRMP/DEIS] for the ROS prescription). In non-WSA lands with wilderness characteristics, emphasize managing for Primitive and SPNM recreational objectives. Recreation facilities would be developed only in response to resource management needs and would be appropriate to the managerial setting identified for each ROS class. Other resource uses would be subject to limitations based on the class designations and associated opportunity types. According to BLM's own planning documents motorized use is compatible with the semi-primitive recreation opportunities (Price FO DEIS Appendix 15 page 1). Alternative E states it will provide opportunities for primitive and semi-primitive recreation opportunities, yet it categorically excludes motorized uses. Clearly, this is inconsistent with previous planning guidance.	Several routes that are either cherry-stemmed into non-WSA lands with wilderness characteristics or act as the border to one of these areas would remain open under Alternative E. Based on ROS definitions, these areas and a portion of adjacent lands, which includes non-WSA lands with wilderness characteristics managed to protect, preserve, and maintain those characteristics, would therefore be managed as ROS category semi-primitive motorized. However, motorized use would be limited to areas outside the non-WSA lands with wilderness characteristics. Therefore, there is no inconsistency in the document.
Recreation	BlueRibbon Coalition	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 Supplemental DEIS (and 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 agency itself recognizes is very important for 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	Impacts from the existing levels of dispersed camping are mentioned in Section 3.3.3 of the Draft RMP/EIS, but are not specifically enumerated or quantitatively described. Such quantitative data does not exist nor has the commentor provided it. As a result, analysis has relied on BLM resource specialist experience. Neither the Draft RMP/EIS nor its supplements encourage a "closure over mitigation" management policy, but actually

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		analyzed, which they must pursuant to NEPA.	encourage the opposite. Management for SRPs and the associated evaluation criteria for large user groups provide the opportunity for the use of an area with mitigation rather than simple closure. The Non-WSA Lands with Wilderness Characteristics Supplement does conclude that significant impacts would occur to motorized user groups, which includes motorized camping, to the extent that demand for these recreation opportunities would not be able to be met. The analysis in the Proposed RMP/Final EIS has been clarified to better describe these impacts. Additionally, the impacts to other resources from fewer OHV opportunities due to variances in designated routes has been clarified.
Recreation	BlueRibbon Coalition	It is impossible to asses the impacts to dispersed camping from the information disclosed in the Supplemental DEIS (and the DEIS for that matter). This is especially true for vehicle-based camping, which is impacted by both the RMP and the Travel Plan.	As noted in Chapter 2 of the Draft RMP/EIS (page 2-18) or the Proposed RMP/Final EIS (page 2-57). In both documents, dispersed camping is allowed throughout the Price Field Office, subject only to closure in a few areas of highly concentrated recreation use and also subject to review of large groups based on SRP evaluation criteria to ensure resource protection. Because of the largely open nature of dispersed camping, impacts would be very small and therefore are not prominent in chapter 4.
Recreation	Capital Trail Vehicle Assocaition	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.	The route/trail identification process is an implementation level decision. The Draft RMP/EIS addresses motorized route identification. Future implementation level decisions could address additional route/trail identification. This could include construction of new routes, following appropriate environmental review.
Recreation	Capital Trail Vehicle Assocaition	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.	The route/trail identification process is an implementation level decision. The Draft RMP/EIS addresses motorized route

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			identification. Future implementation level decisions could address additional route/trail identification for both motorized and non-motorized users. This could include construction of new routes, changing user type, route/trail alignment, or other management adjustments following appropriate environmental review.
Recreation	Capital Trail Vehicle Association	Please explain why the needs of non-motorized recreationists are provided for at a much higher level (quality and quantity) than motorized recreationists?	Motorized and non-motorized recreation uses were considered during the planning process. The Draft RMP/EIS offers management flexibility to ensure the resource values are protected while allowing for a range of motorized and non-motorized access and recreation.
Recreation	Capital Trail Vehicle Association	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."	Identifying motorized routes within a non-motorized focus area is intended to reflect the management emphasis for the area as a whole, not whether or not there are identified motorized routes in the area. Generally, routes in non-motorized focus areas are used for accessing non-motorized recreation within the area. Conflicts between motorized and non-motorized users in these areas are described in chapter 4.
Recreation	Capital Trail Vehicle Association	Because vehicles are not permitted to travel off designated routes - for any reason - the BLM is proposing a "vehicle camping only in designated campsites" in the entire Field Office. Such a restrictive policy would be appropriate for National Parks or National Monuments, but for Public Lands this is truly unheard of.	Chapter 2 of the Proposed RMP/Final EIS allows "dispersed camping throughout the PFO without permit, unless otherwise designated by BLM." In areas of high recreation use, camping areas may be identified at the implementation level. There is no restriction to vehicle camping only in designated campsites.
Recreation	Capital Trail Vehicle Association	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. We request that this procedure be used by this project and all future agency projects. Additionally, we request that the cumulative negative impact on motorized recreationists resulting from this lack of adequate accounting be evaluated and adequately mitigated.	The impacts requested by the commentor are already contained in the Draft RMP/EIS chapter 4.
Recreation	Emery County Public Lands	the identification of Large Group Areas seems to contradict both the designation of the areas as having wilderness characteristics, but it also seems to conflict with the management practices that	As with the other alternatives, the management prescriptions for Alternative E

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	Department	are promoted throughout the alternative. Even if the Summerville/Chimney Rock Trail System is not designated, does this mean it does not exist? The very mention of the trail system seems to indicate its existence.	<p>apply to the entire Price Field Office, unless specifically limited to a geographic area. The management referred to by the commentor applies to areas of the Price Field Office outside non-WSA lands with wilderness characteristics. The areas outside the non-WSA lands with wilderness characteristics would still require management under this alternative.</p> <p>Concerning the mention of the Summerville/Chimney Rock Trail System, the supplement is intended to be read as part of the Draft RMP/EIS. As such, not mentioning the Summerville/Chimney Rock Trail System at all leaves the reader to question how it would be managed under Alternative E, since it is specifically noted in the other alternatives. The BLM has never denied the existence of the Summerville/Chimney Rock Trail System, but found that its existence did not eliminate the presence of wilderness characteristics.</p>
Recreation	Emery County Public Lands Department	2-19 SRPs on the Old Spanish National Historic Trail would be authorized only for heritage tours and reenactments. Since most of the recognized Spanish Trail is located directly on Emery County or BLM system roads in the area, is the BLM's intent to restrict other SRP's for other uses, ATV Tours, Competition Events, etc? This comment in the alternative is of substantial concern, also because this is a completely new management scheme for areas outside of the areas that are identified as potential WC areas. Emery County is unclear why this alternative includes management prescriptions that are for areas completely outside of the areas of concern.	The language in the Proposed RMP/Final EIS has been modified to allow for other SRPs on the Old Spanish Trail.
Recreation	Outward Bound Wilderness	One of Outward Bound's primary concerns is that energy exploration and vehicle use do not impact our clients on the Green River. To Outward Bound this means no vehicle use or noise near the rim of the canyon, no new roads for energy exploration near the rim, and no visual or auditory impacts from extraction efforts, including nighttime lighting.	The Draft RMP/EIS evaluated a range of alternatives for public lands management along the Green River, including an alternative that limited development along the Green River corridor. The Draft RMP/EIS provides the decisionmaker a range of alternatives from which to develop the Proposed RMP and eventually the Final

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			RMP/ROD.
Recreation	The Wilderness Society	The BLM should acknowledge the importance of providing more opportunities for quiet recreation in the Price Field Office and the agency policies that support management to maintain these opportunities. Under Alternative E, 970,000 acres are available for ORV use on designated routes.	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. Simply by limiting OHV use to identified routes, the number of opportunities for "quiet recreation" will increase, as the areas away from OHV use on a designated route increases.
Recreation	The Wilderness Society	The Supplement repeatedly and incorrectly asserts that motorized recreation is the dominant recreational use in the Price Field Office. The first incidence occurs on page 4-30 of the Supplement: "Current trends show that the majority of recreational use demand is and will continue to be for motorized and developed forms of recreation." This assertion is unsubstantiated and is in direct opposition to every study done on American public lands recreation trends done since the latter half of the 20th century. All recreation use is increasing - to propose that over 80% of the planning area should be available to a group which represents 15% of total users is not a balanced management approach. And to imply that protecting lands with wilderness characteristics would somehow harm the off-road motorized recreation community or reduce revenues is simply an unfounded assertion.	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

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			<p>protecting other resource values for current and future generations.</p> <p>The Draft RMP/EIS contains alternatives which strike an appropriate balance between environmental protection, a variety of recreation uses, and development of the mineral resources on our public lands consistent with the requirements of the Mining and Mineral law and FLPMA. The Proposed RMP/Final EIS will offer BLM management the flexibility to protect resource values and uses while allowing for acceptable levels of mineral development.</p> <p>The BLM considered a range of alternatives that considers closure of between 138,000 acres (6%) to 1,520,000 acres (61%) of the Price Field Office to OHV use, while allowing OHV use along between 573 miles and 3,210 miles of designated routes. The Proposed RMP/Final EIS offers management flexibility to ensure the resource values are protected while allowing for acceptable levels of motorized access and recreation. The areas proposed for closure are responsive to the issues raised during the scoping period early in the planning process, as are the routes that are designated for continued use.</p>
Recreation	Theodore Roosevelt Conservation Partners	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.	BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. Compensating hunters is outside the scope of this EIS. However, as described in Appendix G of the Proposed RMP/Final EIS timing limitation stipulations on oil and gas leasing would help protect hunting values.
Socioeconomics	American Petroleum Institute	The socio-economic analysis contained in the SDEIS underestimates the impacts of Alternative E regarding the loss of jobs related to the energy industry. According to a study prepared by the University of Utah's Bureau of Economic and Business Research, the energy industry accounts for	Please see general comment response # 1

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		49.5 percent of the employment and 60 percent of the total wages in Uintah and Duchesne Counties. The statement in the Draft Supplemental DEIS that "decreased gas development would lower future potential employment in the area by about 90 part-time and full-time jobs per year as compared to the No Action Alternative" does not seem supportable in light of the University of Utah findings. The analysis needs to carefully reexamine the negative impacts associated with the potential of lost revenue as a result of diminished energy development activity and associated purchasing to the local, state and federal treasuries. The significant benefits to local and regional economies from energy development are commonly underestimated, as a review of a detailed study on the effects of energy development on the economy of the State of Colorado would make clear (see McDonnell, Bender, Hurley and Donnelly, Oil and Gas Impact Analysis, Colorado Energy Research Institute, June 2007).	
Socioeconomics	Bill Barrett Corporation	<p>BLM's Alternative E contains insufficient data or analysis of actual use of these lands for primitive and unconfined recreation and the socio-economic impacts of protecting these lands solely for their "wilderness" values. In order to carry forward Alternative E or select components into the Final Decision Record and Final RMP, BLM would have to perform a socio-economic analysis regarding unconfined recreation uses, as well as the negative impact Alternative E would have on oil and gas development and the energy industry.</p> <p>BLM defined "wilderness characteristics" as lands that contain an outstanding opportunity for primitive and unconfined recreation. BLM, however, in establishing which lands possess wilderness characteristics, fails to analyze or include in its determinations how much, if any, actual recreation occurs on these lands. Thus, Alternative E contains insufficient analysis of actual recreational use of these lands for primitive and unconfined recreation and the socioeconomic impacts of protecting these lands solely for their "wilderness" values. See Price DRMP/DEIS Supp. at 4-37—4-40, 4-45—4-50, 4-88—4-90. BLM fails to provide a thorough analysis of the negative economic impacts from protecting all WCAs for their wilderness values. Id. BLM does not include quantifiable economic benefits that would result of selection of Alternative E.</p> <p>Mineral development plays a large role in the local economic growth and opportunity for Emery and Carbon Counties. Alternative E fails to account for the economic impacts from the restrictions that would be placed on mineral development. These impacts include tax revenues, employment, energy prices and royalty payments. BLM should consider the economic impact of restricting oil and gas development on lands that allegedly contain wilderness characteristics before making its final decision on this RMP.</p>	Please see general comment response # 1
Socioeconomics	Bjork, Lindley, & Little	In its analysis of the severe socioeconomic impacts of adopting Alternative E, the BLM did not adequately address the severe impacts of closing such large areas to leasing on local, state, and national economies.	Please see general comment response # 1
Socioeconomics	Capital Trail Vehicle Assocaition	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. The economic impact of these closures will be devastating to	The impact analysis used the best available information and methodology to determine the economic and social impacts associated

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		<p>small communities throughout the West. Models can be manipulated to predict any result. 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 on the ground data from businesses and individuals that use our public lands. We request that the economic analysis use actual local data to determine the true economic and social impact of proposed motorized access and closures on the public.</p>	<p>with the alternatives in the Proposed RMP/Final EIS. The socioeconomic analysis from the Draft RMP/EIS chapter 4 has been updated in the Proposed RMP/Final EIS in section 4.6. CEQ regulations implementing the National Environmental Policy Act (NEPA) require agencies evaluating effects on the human environment in an environmental impact statement (EIS) to identify incomplete or unavailable information, if that information is essential to a reasoned choice among alternatives (43 CFR 1502.22). As is typical in programmatic planning efforts, site-specific data is used to the extent possible and may not be entirely available for application and analysis of the entire Price Field Office. Additional information on incomplete or unavailable information can be found in section 4.1.4 of the Proposed RMP/Final EIS.</p>
<p>Socioeconomics</p>	<p>Capital Trail Vehicle Association</p>	<p>We request adequate evaluation of the economic and social impacts of this proposed action be considered in the analysis and decision-making. Additionally, we request that the cumulative negative impact resulting from inadequate evaluation of economic and social impacts in past actions are considered in the analysis and decision-making and that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.</p>	<p>Additional information is being provided on all economic factors used to evaluate socioeconomic impacts. Impacts of the Plan are fully evaluated in Chapter 4, section 4.6 for socioeconomic and baseline information is provided in Chapter 3, section 3.6. An additional socioeconomic technical report is provided which explains the methodology used to analyze the socioeconomic impacts from having access to BLM lands for multiple uses. It provides the calculations and results for energy production, recreation, and grazing under each alternative allowing for socioeconomic impact comparisons across those alternatives. The report also discusses the input/output model IMPLAN used to model additional economic activity associated with the direct industries tied to the multiple uses on BLM land. The final plan and DEIS evaluates the socioeconomic</p>

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			impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of grazing, recreation, and energy production to local communities, such as Emery and Carbon counties under the alternatives, which all have varying levels of resource protection. A discussion of this analysis is provided in Chapter 4, section 4.6.
Socioeconomics	Carbon County Public Lands Department	<p>If even one of the proposed wells in the area is lost due to this proposed action it will have significant negative economic impacts to our area.</p> <p>The Carbon County Recreation Transportation Special Service District and the Community Impact Board (CIB) funding comes from the State's share of the mineral lease royalty monies. These boards make possible many capital improvements such as culinary water and sewer improvements as well as other public works and improvements in many small rural areas throughout the state. The impact on socio-economics is not described in sufficient detail.</p>	Please see general comment response # 1
Socioeconomics	ConocoPhillips Company	The socio-economic analysis in the SDEIS greatly underestimates the impacts of Alternative E regarding the loss of jobs related to the energy industry. According to a study prepared by the University of Utah's Bureau of Economic and Business Research, the energy industry accounts for 49.5 percent of the employment and 60 percent of the total wages in Uintah and Duchesne Counties. BLM's claim that "decreased gas development would lower future potential employment in the area by about 90 part-time and full-time jobs per year as compared to the No Action Alternative" is unquestionably inaccurate. BLM must re-evaluate the negative impacts associated with lost royalties and fee revenue to the local, state and federal treasuries and take into consideration the results of this study. Additionally, the SDEIS must analyze the increased costs associated with development of existing leases in conjunction with the severe restrictions contained in Alternative E.	Please see general comment response # 1
Socioeconomics	Coyote Oil & Gas Company, LLC	It appears to me that inadequate consideration in drafting this alternative may have been given to how it would reduce both tax income and employment, on which local, state, and federal governments depend. Remember, taxes and employment already have been reduced by previous such regulations. Also, the BLM's claim that "decreased gas development would lower future potential employment in the area by about 90 part-time and full-time jobs per year" appears to me to be grossly in error, considering that oil and gas companies provide 50% of the jobs and 60% of the wages paid in Uintah and Duchesne Counties (University of Utah).	Please see general comment response # 1
Socioeconomics	Discovery Exploration Inc.	The BLM has drastically exceeded what could be construed as reasonable management in the development of Alternative E, which would withhold 1.5 million acres, more than 60 percent of the study area, from oil and gas leasing and other activities while imposing no surface occupancy on another 130,000 acres. Adoption or incorporation of Alternative E into the Preferred Alternative of the Price Draft EIS/RMP would have a crippling impact on oil and gas exploration and development and other multiple uses in the Price Field Office, which would in turn have a severely negative	Please see general comment response # 1

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		<p>impact on local, state, and Federal economies. We urge the BLM to acknowledge the alarming impacts its implementation would have on the nation and Utah's citizens by limiting wilderness-type management to designated wilderness and Wilderness Study Area (WSA).</p>	
Socioeconomics	Discovery Exploration Inc.	<p>The socio-economic analysis contained in the SDEIS grossly underestimates the impacts of Alternative E regarding the loss of jobs related to the energy industry. According to a study prepared by the University of Utah's Bureau of Economic and Business Research, the energy industry accounts for 49.5 percent of the employment and 60 percent of the total wages in Uintah and Duchesne Counties. The BLM's claim that "decreased gas development would lower future potential employment in the area by about 90 part-time and full-time jobs per year as compared to the No Action Alternative is unquestionably inaccurate. The analysis must re-evaluate the negative impacts associated with lost revenue to the local, state and federal treasuries. Additionally, the SDEIS must analyze the increased costs associated with development of existing leases in conjunction with the severe restrictions contained in Alternative E. These flaws must be rectified and fully considered before the FEIS is released.</p>	Please see general comment response # 1
Socioeconomics	Emery County Public Lands Department	<p>Emery County sees the potential impacts to the social fabric of the community as important as the economic impacts. The county has consistently communicated the importance from a social perspective of activities such as grazing, ranching, uranium mining, OHV and off-road access and related activities. The county is desirous to continue this message.</p> <p>In terms of the Economic impacts from Alternative, the proposal is so far away from where it needs to be to provide an accurate economic analysis, it is difficult to provide useful comments. Emery County has provided very specific employment numbers from a wide variety of resource based industries and their possible impacts from the original alternatives.</p>	<p>Additional information is being provided on all economic factors used to evaluate socioeconomic impacts. Impacts of the Plan are fully evaluated in Chapter 4, section 4.6 for socioeconomic and baseline information is provided in Chapter 3, section 3.6. An additional socioeconomic technical report is provided which explains the methodology used to analyze the socioeconomic impacts from having access to BLM lands for multiple uses. It provides the calculations and results for energy production, recreation, and grazing under each alternative allowing for socioeconomic impact comparisons across those alternatives. The report also discusses the input/output model IMPLAN used to model additional economic activity associated with the direct industries tied to the multiple uses on BLM land. The final plan and DEIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of grazing, recreation, and energy production to local communities, such as Emery and Carbon counties under the alternatives, which all</p>

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			have varying levels of resource protection. A discussion of this analysis is provided in Chapter 4, section 4.6. The final plan and DEIS have been re-edited to consider, to the extent possible, the socioeconomic impacts of having access to BLM lands for multiple uses.
Socioeconomics	Fidelity Exploration and Production Co.	BLM has drastically exceeded what could be construed as reasonable management in the development of this alternative. Alternative E would withhold 1.5 million acres (more than 60 percent of the study area) from oil and gas leasing and other activities while imposing no surface occupancy (NSO) on another 130,000 acres. Adoption or incorporation of Alternative E into the Preferred Alternative of the DSEIS would have a crippling impact on oil and gas exploration and development and other multiple uses in the Price FO planning area, which would in turn have a severely negative impact on local, state, and Federal economies.	Please see general comment response # 1
Socioeconomics	Fidelity Exploration and Production Co.	The socio-economic analysis contained in the DSEIS grossly underestimates the impacts of Alternative E regarding the loss of jobs related to the energy industry. According to a study prepared 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 Impact of Utah's Oil and Gas Exploration and Production Industry, Phase I – The Uintah Basin), the energy industry accounts for 49.5 percent of the employment and 60 percent of the total wages in Uintah and Duchesne Counties. BLM's claim that "decreased gas development would lower future potential employment in the area by about 90 part-time and full-time jobs per year as compared to the No Action Alternative" is completely and unquestionably inaccurate. BLM must re-evaluate the negative impacts associated with lost revenue to the local, state and federal treasuries. Additionally, the DSEIS must analyze the increased costs associated with development of existing leases in conjunction with the severe restrictions contained in Alternative E. These flaws must be rectified and fully considered before the FEIS is released.	Please see general comment response # 1
Socioeconomics	Independent Petroleum Association of Mountain States (IPAMS)	Overall, the analysis in section 4.3.22.1 Economic Impacts is seriously lacking in the quantitative data necessary to do a satisfactory analysis of the negative impact from severely constraining the oil and gas industry. A major impact that should be considered is a decrease in the energy resources available to the community, state and nation, yet this Supplement is silent on the issue. Restricting development of vital energy resources has a significant socio-economic impact. The analysis does not give adequate weight to the importance of energy supplies at all levels of the economy.	Please see general comment response # 1
Socioeconomics	Independent Petroleum Association of Mountain States (IPAMS)	In Section 4.3.22.1, the BLM admits that it cannot quantify the economic stimulus from recreation under Alternative E. It is stated that some jobs could increase, but others would be lost because of severe restrictions on OHV use. This lack of analysis is contradictory to FLPMA, and the BLM has failed to comply with the guidelines contained in the BLM's Land Use Planning Handbook (H-1601-H) and Instruction Memorandum No. 2002-167 regarding a socio-economic analysis.	The BLM is required to use the best available data in its socioeconomic impact analysis, but is not required to generate data where none exists. The commentor is incorrect in stating that the majority of the socioeconomic analysis concentrates on unquantified recreation data. The supplement must be

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		<p>On page 4-64, it is stated that "...recreational activities are expected to remain important economically and socially to residents and visitors who travel to the area..." It then goes on to state that "Accurate quantification of the economic stimulus associated with recreation in the PFO is not possible at this time because verifiable data on recreational use is lacking." Yet the majority of the socio-economic analysis is concerned with this unquantifiable value. In fact, the section goes on to state that benefits from "traditional" recreation activities would increase, yet restrictions on motorized recreation would cause economic decline. So the conclusion is the economy could benefit, and then again it may not. This ill-defined economic impact from recreation does not justify the obvious negative impact from the decline in oil and gas economic activity that would result under Alternative E.</p>	<p>considered in the context of the original DEIS; taken together, far more space is devoted to the analysis of impacts to coal, oil and gas, and grazing, than to recreation. The analyses contained in the Price Draft RMP/EIS and the Wilderness Characteristics Supplement to the Draft RMP/EIS has been modified in the Proposed RMP/Final EIS improving the direct and cumulative impacts analysis for minerals and socioeconomics. Specifically, the following revisions were made: 1) an analysis of the impacts to SITLA lands; 2) an analysis of the impacts on the amount of recoverable oil and gas resources and loss of revenue (including fiscal impacts to state and local governments) for the Proposed RMP/Final EIS; and 3) a more specific analysis of the economic impacts of Alternative E and the Proposed RMP/Final EIS, using IMPLAN modeling. In addition, information from the University of Utah Bureau of Economic and Business Research's report, "The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry - Phase II - Carbon and Emery Counties" was included in the analysis, as appropriate.</p>
Socioeconomics	Independent Petroleum Association of Mountain States (IPAMS)	The BLM fails to disclose how the restrictions may combine to increase the consumer cost of gas which may be disproportionately borne by low-income populations, thereby not following Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, 59 Fed. Reg. 7629 (1994).	An analysis of global petroleum supply and demand trends and associated fluctuations in the market price of oil or refined petroleum is outside the scope of this NEPA document. The variables involved in these fluctuations completely outside the scope of this document to influence, aside from the contribution of minuscule amounts of hydrocarbons when compared to global production and refinement capacity. The environmental justice analysis contained in the Draft RMP/EIS and its supplements is limited to the predictable footprint associated

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			with the alternatives proposed. Analysis of impacts of global petroleum prices and their effect on low income populations is outside the scope of this NEPA document.
Socioeconomics	Independent Petroleum Association of Mountain States (IPAMS)	<p>In Section 4.3.22.1, page 4-64, it is stated that employment would decline by 90 part-time and full-time jobs annually because of decreased gas development under Alternative E. This assertion is not backed up by any information about how the BLM arrived at that number. A true economic analysis would provide numbers of current oil and gas employment and then estimate the effect of a 56% decline in leasing of lands with high potential for oil and gas development. Compared to the No Action Alternative, 590 wells would not be drilled, yet the Supplement projects a decrease of only ninety part-time and full-time jobs per year.</p> <p>Table 3-35 in the Price DRMP/EIS issued in July 2004 states that employment in mining is responsible for 17.2 percent of the employment in the planning area, or 1,830 employees. A simple extrapolation from that would imply a decrease of 56% mining jobs or 1,025 jobs. While our example is admittedly simple, it seems more realistic than just 90 employees. It defies logic how such a dramatic decrease in access to lands with high oil and gas potential would result in only 90 lost jobs.</p>	Please see general comment response # 1
Socioeconomics	Independent Petroleum Association of Mountain States (IPAMS)	IPAMS recommends that the results of that study, The Structure and Economic Impact of Utah's Oil and Gas Industry, for Emery and Carbon counties, which will be published in a matter of weeks, be included in the socio-economic analysis in the final RMP/EIS. We will forward that to the Price Field Office as soon as it is available, and request that it be considered part of the administrative record.	Please see general comment response # 1
Socioeconomics	Independent Petroleum Association of Mountain States (IPAMS)	<p>Continuing on to page 4-65, the Supplement states that there would be a decline of \$4.7 million in income annually. Again, it does not specify what this number is based on. If it's based on the earlier assumption that only 90 jobs would be lost, that analysis is likewise flawed and does not take into account the multiplier effect from oil and gas development.</p> <p>Further in Section 4.3.22.1 Economic Impacts, page 4-65, it is stated that "Studies show that managing lands for wilderness characteristics may have some positive benefits to the local economy, above and beyond benefits to individual users of the areas." The studies used are not cited, but have the hallmarks of certain studies done by groups advocating for wilderness protection. Despite the obvious bias of studies done by groups that are advocating for more wilderness, these studies are fundamentally flawed in several respects. 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 PFO, Utah, and throughout the Intermountain West.</p>	The analyses contained in the Price Draft RMP/EIS and the Wilderness Characteristics Supplement to the Draft RMP/EIS has been modified in the Proposed RMP/Final EIS improving the direct and cumulative impacts analysis for minerals and socioeconomics. Specifically, the following revisions were made: 1) an analysis of the impacts from isolating SITLA parcels due to closing adjacent BLM lands to mineral leasing, making the SITLA parcel less economical for development; 2) an analysis of the potential loss in revenue for SITLA due to isolating parcels under each alternative; 3) an analysis of impacts on property taxes, mineral lease payments, and severance taxes from

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			<p>implementing each alternative; 4) an analysis of the impacts on the amount of recoverable oil and gas resources under Alternative E; and 5) a more specific analysis of the socioeconomic impacts of Alternative E, using IMPLAN modeling to determine the impacts on jobs and revenues from implementing Alternative E. In addition, information from the University of Utah Bureau of Economic and Business Research's report, "The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry - Phase II - Carbon and Emery Counties" was included in the analysis, as appropriate. The impacts from recreation use were also reviewed and clarified with more detail, when possible. The potential economic value associated with wilderness, particularly non-market values, is not argued only by wilderness advocacy groups. A recent study sponsored by the US Forest Service summarizes a number of studies arguing such a connection. While these studies typically address the economic benefits of designated wilderness, the benefits may extend to Wilderness Study Areas and to lands being managed to protect, preserve and maintain wilderness characteristics. See: "The net economic value of wilderness", Bowker, J.M.; Harvard, J.E., III; Bergstrom, John C.; Cordell, H. Ken; English, Donald B.K.; Loomis, John B., in The Multiple Values of Wilderness, pp. 161-181, USFS, Southern Research Station, 2005</p>
Socioeconomics	Independent Petroleum Association of Mountain States (IPAMS)	Section 4.3.22.2, Social Impacts analyzes only the social impact to those who would benefit from more wilderness-protected lands. The entire analysis is on the impact from the remaining vestiges of economic activity that cannot be halted legally under Alternative E, such as oil and gas development on existing valid leases. The whole analysis is focused entirely on those who would benefit from wilderness, presumably wealthy retirees to the area and higher income tourists from other parts of	The analyses contained in the Price Draft RMP/EIS and the Wilderness Characteristics Supplement to the Draft RMP/EIS has been modified in the Proposed RMP/Final EIS improving the direct and cumulative impacts

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		<p>the country who want pristine wilderness to play in when it's convenient to visit Utah. The social impacts of restricted ranching, mining, logging, oil and gas, and other economic uses of the land are entirely absent. These impacts include the restriction of job opportunities, the resulting decrease in the standard of living, and changes to the way of life of the local population. The BLM seems to be giving deference to a higher-income segment of society from outside the area, rather than to those tied directly to the land and whose entire lifestyle would change were Alternative E implemented.</p> <p>The following statement from page 4-66 demonstrates the tone of Section 4.3.22.2: "Because development of coal and gas resources is likely to occur on previously leased areas under Alternative E, it is expected that some conservation-minded individuals would still experience long-term impacts from loss of open landscapes, degradation of visual resources, and loss of solitude in these leased areas." The analysis goes on further to talk about the visual impact to these "conservation-minded individuals" we should all be so concerned about. IPAMS would like to remind the BLM that its own analysis for the full RFD of 950 wells would result in an estimated surface disturbance of 7,600 acres (0.3% of the PFO) over the 20-year planning period. With reclamation, the disturbed area would be reduced to 2,850 acres (0.1% of the PFO). Under Alternative E, 590 fewer wells would be drilled, so even less acreage would be disturbed (2,880 acres, or 0.12% of the PFO, and with reclamation 1,080 acres or 0.04% of the PFO), resulting in a miniscule visual impact. IPAMS fails to understand why so much deference is given to the few people who would be bothered by such a small impact.</p>	<p>analysis for minerals and socioeconomics. Specifically, the following revisions were made: 1) an analysis of the impacts from isolating SITLA parcels due to closing adjacent BLM lands to mineral leasing, making the SITLA parcel less economical for development; 2) an analysis of the potential loss in revenue for SITLA due to isolating parcels under each alternative; 3) an analysis of impacts on property taxes, mineral lease payments, and severance taxes from implementing each alternative; 4) an analysis of the impacts on the amount of recoverable oil and gas resources under Alternative E; and 5) a more specific analysis of the socioeconomic impacts of Alternative E, using IMPLAN modeling to determine the impacts on jobs and revenues from implementing Alternative E. In addition, information from the University of Utah Bureau of Economic and Business Research's report, "The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry - Phase II - Carbon and Emery Counties" was included in the analysis, as appropriate. Additionally, a more specific analysis of the social impacts of Alternative E was added, applying the impacts across the range of stakeholders and social interests that use public lands in the Price Field Office.</p>
Socioeconomics	Independent Petroleum Association of Mountain States (IPAMS)	<p>The final conclusion of Section 4.3.22 Social and Economic Impacts on page 4-67 is that none of the impacts of Alternative E will be significant and "...existing conditions and social trends would generally remain the same." It defies logic that Alternative E, with 60% less acreage available for oil and gas leasing, would result in such a small negative social and economic impact. The economic analysis fails to account for lost opportunities due to the proposed management decisions, and seriously underestimates the negative impacts of Alternative E.</p>	<p>Please see general comment response # 1</p>
Socioeconomics	Public Lands Advocacy	<p>BLM has drastically exceeded what could be construed as reasonable management in the development of Alternative E. Adoption or incorporation of Alternative E into the Preferred Alternative of the Price Draft EIS/RMP would have a crippling impact on oil and gas exploration and</p>	<p>Please see general comment response # 1</p>

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		development and other multiple uses in the Price Field Office, which would in turn have a severely negative impact on local, state, and federal economies. We urge BLM to acknowledge the debilitating impacts implementation of Alternative E would have on the nation and Utah's citizens. We recommend that BLM limit wilderness-type management to designated wilderness and Wilderness Study Areas (WSA) in accordance with the findings of BLM Wilderness Study program concluded in 1991.	
Socioeconomics	Public Lands Advocacy	The socio-economic analysis contained in the SDEIS grossly underestimates the impacts of Alternative E regarding the loss of jobs related to the energy industry. BLM's claim that "decreased gas development would lower future potential employment in the area by about 90 part-time and full-time jobs per year as compared to the No Action Alternative" is unquestionably inaccurate. According to a study prepared by the University of Utah's Bureau of Economic and Business Research, the energy industry accounts for 49.5 percent of the employment and 60 percent of the total wages in Uintah and Duchesne Counties. The analysis must also re-evaluate the negative impacts associated with lost revenue to the local, state and federal treasuries. Additionally, the SDEIS must analyze the increased costs associated with development of existing leases in conjunction with the severe restrictions contained in Alternative E and their impact on responsible energy development. These flaws must be rectified and fully considered before the FEIS is released.	Please see general comment response # 1
Socioeconomics	Public Lands Policy Coordination	Chapter 3, socio-economic section should be updated based on the Phase II study conducted by the University of Utah.	The Proposed RMP/Final EIS has been revised to include pertinent information from the University of Utah prepared document "The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry Phase II - Carbon and Emery Counties" where appropriate.
Socioeconomics	Public Lands Policy Coordination	Paragraph 4.3.16 – Minerals and Energy Resources (page 4-45/58) Alternative E does not contain a discussion of EPCA and the national energy policy. Alternative E does not adequately analyze the loss of revenue from formally or effectively eliminating mineral development in many of the lands subject to Special Designations and restrictive viewsheds. There is no indication what the loss of wells means in terms of lost revenue to the United States, the State of Utah, local governments, and Utah's school trust, and the effect of that revenue loss under EPCA. In SITLA's direct experience, companies will not lease one trust land section, if they cannot lease the surrounding BLM sections. BLM decisions to withdraw mineral lands from leasing in areas with "wilderness characteristics," ACECs, and other areas therefore directly affects the economic viability	The analyses contained in the Price Draft RMP/EIS and the non-WSA Lands with Wilderness Characteristics Supplement to the Draft RMP/EIS has been modified in the Proposed RMP/Final EIS improving the direct and cumulative impacts analysis for minerals and socioeconomics. Specifically, the following revisions were made: 1) an analysis of the impacts to SITLA lands; 2) an analysis of the impacts on the amount of recoverable oil and gas resources under Alternative E and loss of revenue; and 3) a more specific analysis of the economic impacts of Alternative E, using IMPLAN modeling. In addition, information from the University of

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		of SITLA's inholdings in those areas, particularly for oil and gas.	Utah Bureau of Economic and Business Research's report, "The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry - Phase II - Carbon and Emery Counties" was included in the analysis, as appropriate. Additionally, the Proposed RMP/Final EIS has been modified to include a complete EPCA analysis for all the alternatives, including Alternative E.
Socioeconomics	Questar Exploration & Production Company	Closure of 56% of lands with high potential for oil and gas to leasing will clearly have a negative impact on local employment and wages and tax revenues. Another important omission is the failure to disclose how the restrictions may combine to increase the consumer cost of gas which will be disproportionately born by low-income populations. (Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, 59 Fed. Reg. 7629 (1994)).	An analysis of global petroleum supply and demand trends and associated fluctuations in the market price of oil or refined petroleum is outside the scope of this NEPA document. The variables involved in these fluctuations completely outside the scope of this document to influence, aside from the contribution of minuscule amounts of hydrocarbons when compared to global production and refinement capacity. The environmental justices analysis contained in the Draft RMP/EIS and its supplements is limited to the predictable footprint associated with the alternatives proposed. Analysis of impacts of global petroleum prices and their effect on low income populations is outside the scope of this NEPA document.
Socioeconomics	Questar Exploration & Production Company	The BLM has failed to comply with the guidelines contained in the BLM's Land Use Planning Handbook (H-1601-H) and Instruction Memorandum No. 2002-167 concerning socio-economic analysis. The analysis should more accurately depict the negative socio-economic impacts of the myriad of additional restrictions that Alternative E 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 PFO.	Please see general comment response # 1
Socioeconomics	Shell Exploration	Shell, like many other companies, has an interest in areas within the PFO, which have not yet been leased. These areas have potential for oil and gas development. In that regard, Shell objects to what appears to be a BLM unilateral, de facto moratorium on oil and gas lease competitive bid sales pending completion of the RMP process. Shell believes that the public would be better served and BLM would ensure compliance with existing mandates under the Energy Policy Conservation Act ("EPCA") to continue its leasing program without further delays.	This issue is outside the scope of this planning process. None of the alternatives in the Draft RMP/EIS and its supplements consider a moratorium on oil and gas leasing. As determined through legal actions, the BLM cannot lease a parcel that contains non-WSA lands with wilderness characteristics

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			until the impacts of oil and gas leasing and development on those characteristics are considered. This NEPA document completes that legal requirement, as set by the Utah District Court.
Socioeconomics	Shell Exploration	Chapter 4 of the RMP fails to identify the socio-economic impacts from implementing Alternative E. These impacts, at a minimum, include: (1) lost high-paying employment opportunities in a region of the State of Utah which already has seen severe economic impacts from the downturn in coal mining; (2) lost tax revenue to local, state and federal government due to reduction in economic activity; (3) lost opportunity for increased oil and gas production to meet our domestic energy needs; and (4) lost opportunity to lease lands not currently under lease through competitive bidding.	Please see general comment response # 1
Socioeconomics	Shell Exploration	BLM should compile detailed data regarding fee, state and public surface and minerals and site-specific data on impacts on these lands and their concomitant oil and gas interests.	Please see general comment response # 1
Socioeconomics	The Wilderness Society	The impact analysis for the Supplement is based almost entirely on unsubstantiated assertions which are in many cases easily revealed to be false. This is unacceptable for a land management plan that will be in place for decades. Over and over the document makes vague and unsubstantiated statements and predictions that do not have any support, either from actual data collected in the planning area or any evidence from other research results. This level of analysis is inadequate; these land management decisions will have very real and lasting social and economic impacts that should be assessed much more thoroughly.	The commentor provides no specifics as to which assertions are unsubstantiated and easily revealed to be false. Additional information is being provided on all economic factors used to evaluate socioeconomic impacts. Impacts of the Plan are fully evaluated in Chapter 4, section 4.6 for socioeconomic and baseline information is provided in Chapter 3, section 3.6. An additional socioeconomic technical report is provided which explains the methodology used to analyze the socioeconomic impacts from having access to BLM lands for multiple uses. It provides the calculations and results for energy production, recreation, and grazing under each alternative allowing for socioeconomic impact comparisons across those alternatives. The report also discusses the input/output model IMPLAN used to model additional economic activity associated with the direct industries tied to the multiple uses on BLM land. The final plan and DEIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of grazing, recreation, and energy production to local

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			communities, such as Emery and Carbon counties under the alternatives, which all have varying levels of resource protection. A discussion of this analysis is provided in Chapter 4, section 4.6.
Socioeconomics	The Wilderness Society	<p>Non-market values have been measured and quantified for decades. There is a well established body of economic research on the measurement of non-market values, and the physical changes (decreases in the source of these values) brought about by oil and gas development and motorized recreation are very easy to measure quantitatively.</p> <p>The BLM must measure and account for changes in non-market values associated with the level of oil and gas drilling and motorized recreation proposed 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 economic impacts on the owners of the lands in the Price Field Office – all Americans. This analysis must include the passive use values of all lands with wilderness characteristics.</p>	<p>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.</p> <p>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 Proposed RMP/Final EIS. These values are discussed qualitatively in the socioeconomics analysis portion of chapter 4 in the Proposed RMP/Final EIS.</p>
Socioeconomics	The Wilderness Society	The BLM must make a thorough examination of the full socioeconomic impacts likely to occur if the management alternatives are implemented. These analyses must take into account the impacts that BLM land management actions will have on the surrounding communities, including the added cost of providing services and infrastructure, the long-term costs of the likely environmental damage, and the impacts on other sectors of the economy. The BLM must examine the role that protected public lands (including non-WSA lands with wilderness characteristics) play in the local economy.	The BLM has revised the socioeconomic impacts of its alternatives from the Draft RMP/EIS. The BLM stands by its revised socioeconomic analysis in Chapter 4 of the Proposed RMP/Final EIS DRMP/EIS. The commentor asserts that surrounding

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			<p>communities will have additional costs of providing services, but provides no evidence to support this assertion. The commentor 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” sectors of the economy; that is the purpose of that section.</p>
Socioeconomics	The Wilderness Society	<p>A complete analysis of the economic trends and socioeconomic impacts for the Price Field Office should include an analysis of total personal income, including all sources of income, rather than relying solely on employment and population. A full accounting of income is necessary to an understanding of the important role that non-labor income — such as retirement income, interest payments, rents, and profits — plays in the regional economy. Investment and retirement income makes up 23% of total personal income in Emery County and 25% in Carbon County, which would make it one of the top “industries” in the area. An economic impact analysis that excludes this income is inadequate and misleading.</p>	<p>Non-labor income has been considered from early in the planning effort, and is contained in the Socioeconomic Baseline Profile. However, there is no evidence that the actions proposed in the alternatives will result in an increase or decrease in such income sources. The commentor’s premise is that the action alternatives will produce degradation to public lands to such an extent as to dissuade individuals (specifically retirees) from relocating to, or staying in, the Price Field Office. The commentor’s assertion that the BLM’s action alternatives will result in such degradation is unsupported by any specific information.</p> <p>Additionally, the commentor’s insinuation that retirees are likely to relocate from or are less likely to locate to the Price Field Office is completely 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.</p> <p>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</p>

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			could predict changes in these components likely to result from the BLM's action alternatives.
Socioeconomics	The Wilderness Society	All mineral extraction will impose social and economic costs on the communities in the planning area and these must be assessed and accounted for in the Final RMP. However, neither the Draft RMP nor the Supplement includes any analysis of the economic and social costs of mineral extraction. For the socioeconomic analysis to be complete, this information must be evaluated. 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 in the alternatives as described in "The Economic and Social Impacts of Oil and Gas Development" (attached).	<p>An additional social analysis of the expected impact of minerals development has been added to Chapter 4, section 4.6 of the Proposed RMP/Final EIS. The BLM does not believe that negative social impacts are a likely result of plan decisions in minerals. The BLM's rationale for this conclusion is contained within the addition to Chapter 4 herein referenced.</p> <p>The document cited by the commentor is not a peer-reviewed manuscript, but an advocacy position published by the Wilderness Society. The BLM has reviewed the publication, and has found nothing in it which the BLM would expect to have altered the approach taken in the revised impact analyses of Chapter 4 in the Proposed RMP/Final EIS. The BLM does not feel the obligation to do a point-by-point rebuttal of a lengthy document that has simply been attached to a comment. The BLM believes that it is the commentor's responsibility to indicate which specifics in the attached document are relevant to the BLM's planning efforts, and where failure to follow the document's recommendations have resulted in error by the BLM.</p>
Socioeconomics	Utah Farm Bureau Federation	<p>Farm Bureau delegates continued a long standing policy supporting "livestock grazing as an integral part of multiple-use and the management of the natural resources." And grazing should be continued by legitimate ranching interests with permits being awarded to livestock owners with base property and water rights. The Taylor Grazing Act provides for the allocation of grazing resources to livestock and the economic contribution to rural communities in the west and should not be transferred to entities for retirement or abandonment.</p> <p>Legitimate, locally based ranching interests are critical to rural communities. Agriculture and related</p>	The analyses contained in the Price Draft RMP/EIS and the non-WSA lands with Wilderness Characteristics Supplement to the Draft RMP/EIS has been modified in the Proposed RMP/Final EIS improving the direct and cumulative impacts analysis for socioeconomics. Specifically, a more detailed analysis of the economic impacts of Alternative E, as well as the other alternatives, was performed using IMPLAN

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		<p>industries are the catalyst for more than 100,000 Utah jobs. The Governor annual Economic Report, graphically shows the value and importance of cattle and sheep grazing operations. It reports that the multiplier (a measure of re-spending of an initial dollar) and the rate of jobs multiplier (a measure of jobs created) for the cattle and sheep industries is greater than many traditional industries. The employment multiplier of over 70 jobs per \$1 million of economic activity (production, transport, processing and sales) is considerably above the statewide median jobs multiplier of 20.3.</p> <p>From a micro economic standpoint, it is important to recognize the impact of displacing even one single average sized cattle or sheep operation.</p>	<p>modeling. This allows for the quantitative tracking of direct and induced economic impacts from various BLM decisions, including decisions that affect livestock grazing. This quantitative economic modeling allowed for the analysis of micro-economic impacts from livestock grazing decisions.</p>
Socioeconomics	Utah State Office of Education	<p>Closing such a large amount of acreage to oil & gas leasing, and all geophysical operations would have dramatic negative effects on employment and quality of life in the region.</p>	<p>Please see general comment response # 1</p>
Socioeconomics	Utah State Office of Education	<p>This decline in employment and personal income in the local economy would have significant negative impacts on the local area. Tax revenues for the state and local communities would be lower, as would the royalty revenues to the trust.</p>	<p>Please see general comment response # 1</p>
Socioeconomics	Western Lands Services	<p>The BLM has drastically exceeded what could be construed as reasonable management in the development of Alternative E, which would withhold 1.5 million acres, more than 60 percent of the study area, from oil and gas leasing and other activities while imposing no surface occupancy on another 130,000 acres. Adoption</p> <p>or incorporation of Alternative E into the Preferred Alternative of the Price Draft EISIRMP would have a crippling impact on oil and gas exploration and development and other multiple uses in the Price Field Office, which would in turn have a severely negative impact on local, state, and Federal economies.</p>	<p>Please see general comment response # 1</p>
Socioeconomics	Western Lands Services	<p>The socio-economic analysis contained in the SDEIS grossly underestimates the impacts of Alternative E regarding the loss of jobs related to the energy industry. According to a study prepared by the University of Utah's Bureau of Economic and Business Research, the energy industry accounts for 49.5 percent of the employment and 60 percent of the total wages in Uintah and Duchesne Counties. The BLM's claim that "decreased gas development would lower future potential employment in the area by about 90 part-time and</p> <p>full-time jobs per year as compared to the No Action Alternative is unquestionably inaccurate. The analysis must re-evaluate the negative impacts associated with lost revenue to the local, state and federal treasuries.</p> <p>Additionally, the SDEIS must analyze the increased costs associated with development of existing leases in conjunction with the severe restrictions contained in Alternative E. These flaws must be rectified and fully considered before the FEIS is released.</p>	<p>Please see general comment response # 1</p>
Socioeconomics	Williams Production	<p>BLM has exceeded what could be construed as reasonable management in the development of</p>	<p>Please see general comment response # 1</p>

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	RMT Co.	Alternative E, which would withhold 1.5 million acres, more than 60 percent of the study area, from oil and gas leasing and other activities while imposing no surface occupancy on another 130,000 acres. Adoption or incorporation of Alternative E into the Preferred Alternative of the Price Draft EIS/RMP would have a crippling impact on oil and gas exploration and development and other multiple uses in the Price Field Office, which would in turn have a severely negative impact on local, state, and federal economies.	
Socioeconomics	Williams Production RMT Co.	The socio-economic analysis contained in the SDEIS grossly underestimates the impacts of Alternative E regarding the loss of jobs related to the energy industry. According to a study prepared by the University of Utah's Bureau of Economic and Business Research, the energy industry accounts for 49.5 percent of the employment and 60 percent of the total wages in Uintah and Duchesne Counties. BLM's claim that "decreased gas development would lower future potential employment in the area by about 90 part-time and full-time jobs per year as compared to the No Action Alternative" is inaccurate. The analysis must re-evaluate the negative impacts associated with lost revenue to the local, state and federal treasuries. Additionally, the SDEIS must analyze the increased costs associated with development of existing leases in conjunction with the severe restrictions contained in Alternative E. These flaws must be rectified and fully considered before the FEIS is released.	Please see general comment response # 1
Soil, Water and Riparian	Blue Ribbon Coalition	BRC understands the benefits, and supports the policy of limiting vehicle use to designated roads, trails and areas. However, we are concerned about the assumption the agency seems to have regarding vehicle use on Mancos shale and other soils contributing to decline in water quality and salinity in the Colorado River. The assumption is repeated throughout the Supplemental DEIS (and DEIS). We cite one example here: On page 4-28 of the Supplemental DEIS, under section 4.3.11, it reads: Impacts to soils, water, and riparian resources, vegetation, and forestry and woodlands: Managing for naturalness, solitude, and primitive recreation would maintain an undeveloped landscape and preserve natural values, including soil, water, riparian, vegetation, and forest and woodland resources. This could reduce surface disturbance, retain existing vegetation, and minimize soil erosion, which would reduce sediment loading in streams and riparian/wetland areas. These increases in acreage would increase the areas where soil, water, and riparian resources would be protected.	The Draft RMP/EIS, its supplements, or the Proposed RMP/Final EIS do not directly link OHV use with declines in water quality and increased salinity in the Colorado River. They do identify a connection between water quality in general and OHV use in and around streams and riparian areas, as well as the potential for overland flow to introduce sediment from OHV use on compacted routes into streams. The analysis does not identify the significance of this impact; by refraining from such a declaration it is intended to denote that the impact is not significant, or that such a declaration is not possible with the present data. As the commentor notes later in their comment, OHV use can have a measurable effect on soil erosion and water quality, which is exactly what the impact analysis points out.
Soil, Water and Riparian	Carbon County Public Lands Department	Carbon County questions that reduced grazing decreases erosion. Most of the soils in our area are heavy clay type soils that resist water permeation. Grazing disturbs and breaks up surface crust, which then allows moisture into the soil perpetuating the germination of plants. Plants with healthy root systems help decrease erosion.	The types of soil crusts referred to by the commentor are generally mechanical or chemical in nature and as they form they secure the very small mineral particles. Due

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			to the size of the mineral particles in the soils, breaking these crusts increases the potential for these particles to be eroded by wind or water. The commentor is correct in noting that plants with healthy root systems help decrease erosion, which is what Draft RMP/EIS notes as well. The commentor provides no scientific evidence that grazing soils with extensive mechanical/chemical crusts increases vegetation cover.
Soil, Water and Riparian	Public Lands Policy Coordination	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 page 1-6 of the Draft RMP/EIS, planning criteria, the BLM states "This plan will recognize the existence of valid existing rights." This statement primarily refers to the rights that BLM, through its land use planning decisions, can grant or deny. Granting or denying water rights is outside the authority of the BLM, and therefore is outside the scope of this NEPA document. The planning criteria also notes "BLM will strive to ensure that management prescriptions are consistent with other planning jurisdictions to the extent possible, within the boundaries described by law and policy." At the landscape level of planning, the determination of impacts on individual water rights is not possible. These impacts will be noted and mitigated on a case-by-case basis at the implementation level.
Soil, Water and Riparian	Utah Farm Bureau Federation	Suggestions within the RMP that reduces grazing decreases erosion is contrary to science. Most of the soils are heavy clay, resisting water infiltration. Grazing disturbs the surface crust, allowing moisture into the soil and fertilizer perpetuating plant germination.	While the commentor is correct that many of the soils are heavy clays which slow water infiltration, breaking these crusts up does not result in plant germination. When the chemical and mechanical soil crusts are broken up, whether by livestock, mineral development, OHV use, or human foot-traffic, the fine-grained clays are easily eroded by wind and water. This can result in increases in sediment movement and decreases in water quality, if the disturbance occurs near a

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			stream. As noted in chapter 4, continued livestock grazing could result in site-specific, short-term soil compaction, erosion, and increased surface runoff. These impacts would be site-specific short-term in areas of concentrated livestock use. Because livestock grazing would be required to meet the Standards for Rangeland Health under all the alternatives, in the long-term upland soils would "exhibit permeability and infiltration rates that sustain or improve site productivity, considering the soil type, climate, and landform" (Standard #1). Therefore, this impact analysis does not draw an incorrect or exaggerated conclusion.
Soil, Water and Riparian	Western Watersheds Project, Inc.	WWP has also reviewed the impacts of livestock on water quality, watersheds and riparian areas showing that the impacts are well understood. 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.	Chapter 2 of the Proposed RMP/Final EIS presents decisions that would protect and benefit water quality. Additionally, the BLM Price Field Office has been and would continue to actively participate in the water quality monitoring program administered by the Utah Division of Water Quality with oversight from the EPA.
Soil, Water and Riparian	Western Watersheds Project, Inc.	Despite an improper capability and suitability analysis, the DEIS failed to quantify and analyze the impacts of livestock grazing within riparian/wetland areas which are critical and sensitive ecosystems within the western landscape.	The Draft RMP/EIS and Proposed RMP/Final EIS have used the best available information and analysis methodology to determine the impacts of landscape-level decisions. The specific impacts associated with livestock grazing on specific riparian areas are addressed during environmental analysis associated with term permit renewals, when allotment specific grazing prescriptions are identified. Managed properly according to the Standards for Rangeland Health and the Guidelines for Grazing, impacts to riparian areas will be minimal. The impacts to riparian/wetland areas from livestock grazing are analyzed in section 4.2.2 of Chapter 4 of the Proposed RMP/Final EIS.
Special Status	Public Lands Policy	We recommend that BLM restrict use of utility poles to areas where underground conduits are	Upon receipt for proposed development, the

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Species	Coordination	impractical. We suggest BLM consider the use of raptor excluders on utility poles where needed.	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.
Special Status Species	The Wilderness Society	<p>Graham's penstemon:</p> <p>A search for the terms "penstemon", "beardtongue", and "Graham" and yielded no occurrences of any of these in the new Supplement. The BLM still is not addressing the habitat needs of the Graham's penstemon. The agency has also failed to provide records that Center for Native Ecosystems has requested regarding the penstemon under the Freedom of Information Act, and CNE has been forced to litigate in order to obtain these documents.</p> <p>Recommendations: The BLM should actively manage penstemon habitat for recovery and should thoroughly address this issue in the RMP/EIS. Further, the BLM should not dodge public scrutiny of penstemon management and should ensure that relevant documents are provided to CNE.</p>	The commentor could not find a specific reference to the Graham's penstemon in the Supplement because there is no management targeted only for the Graham's penstemon in Alternative E. Table 2-7 of the Proposed Plan/Final EIS lists the goals and objectives for management of Special Status Species. Management of federally listed threatened and endangered species, designated critical habitat, and species and habitat proposed for listing, are directed by the Endangered Species Act. Under BLM Manual 6840, BLM is required to manage habitat for candidate species for federal listing, BLM sensitive species, and state-listed species in a manner that will ensure that all actions authorized, funded, or carried out by the BLM do not contribute to the need for the species to become listed. While there is no management specifically targeted only for the Graham's penstemon, management associated with the Nine Mile Canyon ACEC, specifically closure to OHV use and major stipulations (NSO) for oil and gas leasing, will provide protection to this species.
Transportation and Access	BlueRibbon Coalition	Alternative E is also inconsistent: In the Supplemental DEIS, page 2-15 it reads: Administrative Access—Maintaining Motorized Vehicle Access for Range Improvement Construction and Maintenance • Required motorized access for existing and future range projects would be limited to specified routes as identified in the range improvement permitting process. • Identification of administrative access routes to range improvements would be documented in each specific range improvement file. Motorized access to maintain and improve existing and future range projects is allowed, yet, not OHV use. Why? What is the rationale for excluding OHV use, admittedly a non-conforming use, but allowing motorized uses for maintenance and construction of existing and future range improvement, also a non-forming use. Can't it be argued that permitting development of	The decision the commentor notes begins by noting the prescription is associated with "required motorized access." Any new discretionary action implemented under this RMP will be required to comply with the goals and objectives of the other resources' goals and objectives. In this case, prescriptions to protect, preserve, and maintain wilderness characteristics on non-WSA lands specifically

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		additional range improvements would have an impact on “wilderness character?”	notes that they would be closed to new road construction, and that maintenance would be limited to existing facilities and boundary and cherrystem roads. Therefore, under Alternative E, no motorized access would be “required” because no new range projects would be permitted if they didn’t meet the goals and objectives of the protecting, preserving and maintaining non-WSA lands with wilderness characteristics.
Transportation and Access	Public Lands Policy Coordination	A travel plan has not been submitted for the Supplement, nor has one been finalized at all for Carbon County in the Draft RMP. 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 Proposed RMP/Final EIS includes route designations for both the San Rafael area and the remainder of the Price Field Office. However, closure of any routes that may provide access to SITLA parcels only applies to the public use of the routes. Any such closure does not prohibit the State from reasonable access to its lands for economic purposes through separate permit authorization as specified by the Cotter decision (State of Utah v Andrus, 10/1/79). Routes to State sections may not have been identified due to resource conflicts or actual route conditions. The Proposed RMP/Final EIS has been modified to clarify the BLM's responsibilities under the Cotter decision.
Vegetation	BlueRibbon Coalition	It is difficult to ascertain the extent to which any concern of the impact of OHV use on riparian areas had on designating Alternative D 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 impact analysis does note that OHV use could result in soil compaction, erosion and decreased water quality, as well as breaking the soil structure down. While interaction with riparian areas was a consideration in the route designation process, no routes were closed solely for the protection of riparian areas.
Vegetation	Carbon County Public Lands Department	Taking away 13,000 AUMs on Nine allotments would not help ensure good site productivity. Long term vegetation quality and density will be lost. Properly functioning riparian and wetland areas are managed by proper livestock distribution not livestock prohibition.	The analysis of impacts from livestock grazing has been modified to reflect the adherence to the Standards to Rangeland Health will maintain site productivity, and not the general removal of livestock. While a riparian or wetland areas can be in properly

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			functioning condition and be grazed by livestock, they to not have to be grazed by livestock to be in properly functioning condition.
Visual Resources	Emery County Public Lands Department	In addition to adding a massive amount of VRM 1 managed lands, which has substantial restrictive outcomes on surface occupancy, this designation, by definition, contradicts the concept of “cherry stemming” that is specifically promoted in this alternative. How can the BLM manage a viable VRM Class 1 area if they have a legitimate activity, such as a road or gas well that is in a cherry stemmed area? Emery County, as a matter of policy is opposed to the use of cherry stemming in this setting, however, it is important to note that as proposed, Alternative E is not a viable alternative because it effectively contradicts itself.	A required set-back from developed areas is not required to meet the naturalness criteria, either on the ground or in the landscape, associated with the non-WSA lands with wilderness characteristics. In designating other wilderness areas throughout the country, Congress has not required a set-back from busy roads and man-made structures to ensure that sights and sounds are not present from the moment a user steps into the area. Requiring such a standard for non-WSA lands with wilderness characteristics would result in a higher standard than that implemented by Congress for many designated wilderness areas. Application of VRM Class I is also consistent with the rest of the proposed management of the non-WSA lands with wilderness characteristics under Alternative E. Additionally, application of VRM Class I is consistent with the existence of routes if the key observation points are located along the routes.
Visual Resources	EOG Resources Inc.	In areas where lines of sight are long and the landscapes large, the BLM must disclose that the imposition of VRM Class I management objectives on the greater portion of its planning area does not preclude development of exiting oil and gas leases. Conversely, if the BLM does determine that the imposition of VRM Class I management objectives would preclude development of existing leases; it must acknowledge in the final EIS that its actions would constitute a taking. In addition, Alternative E requires oil and gas development in the Nine Mile SRMA to meet VRM restrictions. Imposition of VRM Class I management on existing oil and gas leases would	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

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		inappropriately disallow development on those leases.	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.
Visual Resources	National Outdoor Leadership School	<p>Visual Resources</p> <p>Desolation Canyon: When comparing the Wilderness Study Area (WSA) to areas with wilderness characteristics, an opportunity to protect the WSA viewshed is apparent. The BLM should prescribe a Visual Resource Management (VRM) Class I viewshed where wilderness characteristics exist along the WSA boundary. Such a prescription would do much to preserve the wilderness experience within the WSA.</p> <p>The preferred alternative, however, does not reflect this cautionary approach. Instead, only the WSA and a narrow river corridor are managed at VRM Class I. There remains a narrow Class II buffer zone (in places only ¼ mile wide), and the rest is VRM Class III, which would “partially retain the existing character of the landscape” (PFO Draft RMP, Appendix 6). NOLS and OIA recommend a 1-mile VRM Class I buffer zone where wilderness characteristics exist around the Desolation Canyon WSA and Nine-Mile Canyon SRMA. Beyond this Class I boundary the BLM should designate a 1-mile Class II buffer zone, which would “retain the existing character of the landscape” (PFO Draft RMP, Appendix 6).</p>	The prescribed management objective for visual resources in WSAs is to manage them as VRM Class I in accordance with WO IM 2000-096. This is because the primary objective of WSA management is to retain the WSA’s natural character essentially unaltered by humans during the time it is being managed as a WSA. The same general principle applies to non-WSA lands with wilderness characteristics, where the BLM may decide to manage for them. BLM may choose to manage these lands as either VRM Class I or VRM Class II to protect or preserve the natural scenic resources, in accordance with FLPMA. Management to these visual objectives is in concert with providing prescriptions that are compatible with wilderness characteristic planning decisions. BLM does not use VRM classifications as “buffers” to protect scenic quality of a given area. Rather, the VRM classes are established to manage visual resources based on visual quality, sensitivity, distance from key observation points, and consideration of other management concerns.
Visual Resources	National Outdoor Leadership School	<p>Visual Resources</p> <p>Labyrinth Canyon: Similar to Desolation Canyon, there exist areas that retain wilderness characteristics but do not have a VRM class that would perpetuate those characteristics. NOLS and OIA recommend that a VRM Class I prescription be used throughout the Labyrinth Canyon Special Recreation Management Area (SRMA), with a 1-mile VRM Class II buffer zone along the outside boundary.</p>	The prescribed management objective for visual resources in WSAs is to manage them as VRM Class I in accordance with WO IM 2000-096. This is because the primary objective of WSA management is to retain the WSA’s natural character essentially unaltered by humans during the time it is

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			<p>being managed as a WSA. The same general principle applies to non-WSA lands with wilderness characteristics, where the BLM may decide to manage for them. BLM may choose to manage these lands as either VRM Class I or VRM Class II to protect or preserve the natural scenic resources, in accordance with FLPMA. Management to these visual objectives is in concert with providing prescriptions that are compatible with wilderness characteristic planning decisions. BLM does not use VRM classifications as "buffers" to protect scenic quality of a given area. Rather, the VRM classes are established to manage visual resources based on visual quality, sensitivity, distance from key observation points, and consideration of other management concerns.</p>
Visual Resources	National Outdoor Leadership School	<p>Visual Resources</p> <p>San Rafael Swell: In the current preferred alternative, adjacent to the Sid's Mountain/ Sid's Canyon and Mexican Mountain WSAs, a VRM Class IV region either directly abuts Class I viewsheds or is separated by a narrow VRM Class II viewshed. NOLS and OIA do not think this represents a sound plan for managing visual resources. Lands adjacent to WSAs in the San Rafael Swell that have wilderness characteristics should be given a Class I viewshed, and a 1-mile Class II viewshed should provide a buffer beyond these boundaries.</p>	<p>The prescribed management objective for visual resources in WSAs is to manage them as VRM Class I in accordance with WO IM 2000-096. This is because the primary objective of WSA management is to retain the WSA's natural character essentially unaltered by humans during the time it is being managed as a WSA. The same general principle applies to non-WSA lands with wilderness characteristics, where the BLM may decide to manage for them. BLM may choose to manage these lands as either VRM Class I or VRM Class II to protect or preserve the natural scenic resources, in accordance with FLPMA. Management to these visual objectives is in concert with providing prescriptions that are compatible with wilderness characteristic planning decisions. BLM does not use VRM classifications as "buffers" to protect scenic quality of a given area. Rather, the VRM</p>

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			classes are established to manage visual resources based on visual quality, sensitivity, distance from key observation points, and consideration of other management concerns.
Wild and Scenic Rivers	BlueRibbon Coalition	The agency is required to follow a proscribed procedure insofar as recommending eligible river segments for inclusion in the Wild and Scenic River system. Alternative E abandons that proscribed analysis criteria in favor of criteria developed for an entirely different land management designation and management paradigm.	To consider a full range of reasonable alternatives, the BLM is required to consider, under at least one alternative, managing all rivers that were evaluated as eligible for inclusion in the National Wild and Scenic Rivers System as suitable for such designation. Alternatives C and E both consider management that would make such consideration under those alternatives reasonable and consistent with other prescriptions. As prescribed by BLM policy, other alternatives consider different management for the various river segments, ensuring that a full range of alternatives is considered. The BLM has complied with its policies in evaluating, reviewing, and analyzing the suitability of eligible wild and scenic river segments.
Wild and Scenic Rivers	Public Lands Policy Coordination	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.

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			The BLM will identify these conflicts in the Proposed RMP/Final EIS so that the State and local governments have a complete understanding of the impacts of the Proposed on State and local management options.
Wild and Scenic Rivers	Public Lands Policy Coordination	The state is concerned about suitability findings for those streams where there are significant water diversions upstream.	According to 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.
Wild and Scenic Rivers	Public Lands Policy Coordination	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 in-stream 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, the BLM may assert a Federal reserved water right for appurtenant and unappropriated water with a

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			<p>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.</p> <p>The Draft RMP/EIS states at pg. 2-134 that the recommendation of the segments as eligible or suitable would not affect adjudicated water rights for any identified segment. This concept is further clarified in chapter 2 of the Proposed RMP/Final EIS.</p>
Wild Horses and Burros	Carbon County Public Lands Department	If forage is to be allocated to Wild Horse populations, it must first be scientifically provable that these horses are indeed descended from the Spanish Barb that became known as the wild horse population of the American West. Second, full compliance with Section 315A of Taylor Grazing Act should be met, "The Secretary of the Interior shall make provision for the protection, administration, regulation, and improvement of such grazing districts as may be created under the authority of section 315 of this title."	The "Wild Free-Roaming Horses and Burros Act" does not limit its protections to horses descended from the Spanish Barb, but to "all unbranded and unclaimed horses and burros on public lands of the United States" (16 USC 1332 (b)). In addition to complying with the Taylor Grazing Act, the BLM is also required to comply with the "Wild Free-Roaming Horses and Burros Act." The Draft RMP/EIS does not close any portion of the grazing district due to wild horses, and the Proposed RMP/Final EIS is consistent with the Carbon and Emery Plans, in relation to wild horses and burros management.
Wilderness	Bill Barrett Corporation	The primary focus of BBC's comments is on the following WCAs: Desolation Canyon, Jack Canyon, Price River, Lower Price River, Lost Springs, and Never Sweat Wash. In summary, BBC respectfully submits that these WCAs do not meet the applicable criteria for designation as wilderness under the Wilderness Act or otherwise warrant protection through management prescriptions to preserve "wilderness characteristics." The portions of these WCAs that overlap existing or proposed federal oil and gas leases already contain extensive human imprints such as producing wells, access roads, pipelines, and other related infrastructure, as well as extensive grazing infrastructure and networks of county roads and established OHV routes.	Please see general comment response # 3
Wilderness	Bill Barrett Corporation	Portions of the Desolation Canyon and Jack Canyon WCAs, as well as the Nine Mile Canyon SRMA, are located in the West Tavaputs natural gas field in T. 12-13 S., R. 14-17 E. These lands already contain extensive human imprints such as roads, wells, pipelines and associated infrastructure and do not provide opportunities for enjoyment of naturalness, solitude, or primitive and unconfined recreation.	As part of BLM's wilderness characteristics inventory maintenance for the Jack Canyon area, BLM performed a combination of data and on-site reviews. This area was inventoried in 1999 and revised in 2002. OHV

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		<p>Based upon UDOGM data as of November 2007, the Jack Canyon WCA contains:</p> <ul style="list-style-type: none"> • 11 producing wells • 3 wells currently being drilled, • 2 shut-in wells and 5 plugged and abandoned wells • Over 9 miles of roads recognized by Carbon County. • Over 30 additional wells proposed in the West Tavaputs EIS <p>Given the existing infrastructure, valid existing leases and other permitted uses that fall within this portion of the WCA, BBC supports a finding that further areas do not contain wilderness characteristics or are not otherwise eligible for designation as wilderness under the Wilderness Act.</p> <p>Based upon Utah Division of Oil, Gas and Mining (UDOGM) data, as of November 2007, the Desolation Canyon WCA contains:</p> <ul style="list-style-type: none"> • 20 producing wells; 4 wells currently being drilled • 41 approved drilling permits • 1 shut-in wells and 22 plugged and abandoned wells • 11.47 miles of roads in Carbon County and 37 miles of road in Emery County. <p>Given the existing infrastructure, valid existing leases and other permitted uses that fall within this portion of the WCA, BBC supports a finding these areas within the West Tavaputs natural gas field do not contain wilderness characteristics or are not otherwise eligible for designation as wilderness under the Wilderness Act.</p> <p>Thus, the portions of these WCAs that are within the West Tavaputs natural gas field do not contain wilderness characteristics values and do not warrant BLM management to preserve or protect wilderness characteristics values.</p>	<p>trails were known, as shown on Draft RMP/EIS map 2-54. The BLM revised the Jack Canyon non-WSA land with wilderness characteristics maintenance based on oil and gas development. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p> <p>As part of BLM's wilderness characteristics inventory maintenance for the Desolation Canyon area, BLM performed a combination of data and on-site reviews. Portions recommended for review in public comments were included from 1999 Inventory and 2002 Revision. OHV trails were known, as shown on Draft RMP/EIS map 2-54. Coal potential is recognized, as shown on Supplement map 2-70. Oil and gas potential is recognized, as shown on Supplement map 3-23. BLM did revise the Desolation non-WSA land with wilderness characteristics area in 2007 based on new oil and gas development activity. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Bill Barrett Corporation	<p>A recent detailed ground-truthing study of the Lower Price River, Lost Springs, and Never Sweat Wash WCAs underscores that these WCAs contain extensive human imprints that render these areas ineligible for designation as wilderness under the Wilderness Act, and are not otherwise worthy of preservation or protection as wilderness characteristics areas. A copy of this report is attached under Tab 1 and incorporated into these comments by reference.</p> <p>The groundtruthing report details the following:</p> <ul style="list-style-type: none"> • These WCAs contain a total of approximately 358 miles of Emery County maintained and/or claimed roads (179 miles) and off-road vehicle routes (179 miles). Map 3, attached under Tab 1, details the vast system of OHV trails in the area. 	<p>As part of BLM's wilderness characteristics inventory maintenance for the Lost Springs Wash area, BLM performed a combination of data and on-site reviews. This review took into consideration SRP's for motorcycle events, the rail road line, OHV trails shown on Draft RMP/EIS map 2-54, Chimney rock trail system, O/G leases shown on Supplement map 3-23, and gravel potential shown Supplement map 2-65. No new information was submitted that has not</p>

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		<ul style="list-style-type: none"> • A GIS analysis conducted for this study indicates that approximately 97% of the WCA study areas are located within one mile of a maintained road or OHV route. See Report under Tab 1 at page 7. • An active main railroad line traversed by trains several times per day forms the boundary for a portion of the Never Sweat Wash WCA, and severely impedes opportunities for solitude and unconfined recreation. • These WCAs are covered by all or portions of at least 24 federal grazing allotments, which contain livestock infrastructure, such as fences and stock ponds. • The eastern portions of these WCAs contain 44 active mining claims, encompassing 6,400 acres. These WCAs contain at least 26 issued federal oil and gas leases (totaling 18,817 acres) and 19 active state oil and gas leases (totaling 10, 578 acres). • There are 12 plugged and abandoned wells within the portions of the WCAs studied. <p>This detailed ground-truthing study underscores that these two WCAs contain extensive human imprints that render these areas ineligible for designation as wilderness under the Wilderness Act. Given the extensive oil and gas leases, active mining claims, grazing allotments, and OHV recreation use within these WCA areas, BLM should continue to manage these areas for these other uses and not seek to impose any measures to protect wilderness characteristics.</p>	<p>already been considered in BLM's wilderness characteristics inventory maintenance process.</p> <p>As part of BLM's wilderness characteristics inventory maintenance for the Never Sweat Wash area, BLM performed a combination of data and on-site reviews. This review took into consideration SRP's for motorcycle events, the rail road line, OHV trails shown on Draft RMP/EIS map 2-54, Chimney rock trail system, O/G leases shown on Supplement map 3-23, and gravel potential shown Supplement map 2-65. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p> <p>As part of BLM's wilderness characteristics inventory maintenance for the Price River area, BLM performed a combination of data and on-site reviews. The 2002 wilderness characteristics review included data on OHV routes (see also Draft RMP/EIS map 2-54). The 2007 wilderness characteristics inventory already reviewed additional acreage recommended by public comments. Oil and gas potential was considered as shown on Supplement map 3-23. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Bill Barrett Corporation	To account for these sensory intrusions upon wilderness characteristic values, BLM should impose a 1.5 mile radius buffer zone from human imprints, such as roads, wells, OHV trails or pipelines, and exclude areas within these buffer zones from wilderness characteristic areas.	Please see general comment response # 15
Wilderness	Bill Barrett Corporation	SUWA has not provided valid and complete data to substantiate their land use proposals. Their data submissions to BLM lack the requisite quality, objectivity, utility and integrity required under the Data Quality Act. Accordingly, BLM is precluded from basing a wilderness characteristics designation	As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This

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		based upon SUWA data, and cannot disseminate such a land use designation to the public in the Final Decision Record for the Price RMP.	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 in the Administrative Record). Some of the areas reviewed were because of data provided by the public, but the BLM Interdisciplinary team reviewed all submitted data to ensure that the information was accurate. The BLM is confident of high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Wilderness	Bill Barrett Corporation	<p>FLPMA does not require BLM to manage each parcel of public land with all potential uses available on those lands. In certain areas, BLM can make the decision to focus on allowing a statutory defined major use of public lands, i.e. minerals development, to the exclusion of other uses of those particular lands, such as primitive recreation in wilderness characteristics areas.</p> <p>“Multiple use” and environmental organizations’ desire for millions of acres of pristine public lands (i.e. “wilderness”) are mutually exclusive concepts. FLPMA’s definitions of multiple use and the major uses of public lands highlight the on-going extraction and utilization of natural resources on public lands for the benefit of the American people. 43 U.S.C. § 1702(c). Wilderness characteristics are not a major use of public lands defined in FLPMA. Lands that allegedly contain wilderness characteristics are not afforded any special protection or priority under FLPMA or any other federal statute. Accordingly, BLM should manage non-WSA lands that may or do possess wilderness characteristics for multiple use, and emphasize promotion of major uses of public lands defined under FLPMA.</p>	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 wilderness character management, amongst the various resources in a way that provides uses for current and future generations. The impacts of protecting Non-WSA lands with wilderness characteristics is fully disclosed in Chapter 4 of the DRMP/DEIS.
Wilderness	Bill Barrett Corporation	General Price River Area (Lower Price River, Lost Springs Wash, and Never Sweat Wash WCAs)	As part of BLM’s wilderness characteristics inventory maintenance, BLM performed a

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		<p>The only difference in the BLM wilderness assessments in 1980 and 2001 for this area is that BLM now determined that, despite numerous human imprints including about 60 vehicle routes, the area could be said to offer enough vegetative and topographic screening to provide opportunities for primitive and unconfined recreation. See Price River WIA at 6. BLM's 2001 assessment did not indicate that the vegetation or topography of the area had changed over twenty-one years; BLM's analysts simply held a different view than their predecessors about whether the observable human imprints were "substantially noticeable."</p> <p>In sum, in its 2002 submission to BLM, SUWA re-gerrymandered boundaries, extensively cherry-stemmed roads and imprints of man, and did not take an objective approach in its wilderness "inventories." SUWA's wilderness characteristics data contains serious factual errors, severe substantive omissions, and fundamental analytic flaws. Thus, SUWA submissions, and BLM's reliance and use of these inventories is arbitrary and not in conformance with FLPMA. BLM should not use these inventories as part of its final decision making process.</p> <p>As discussed above, BLM's decision is arbitrary to the extent BLM relied upon SUWA information to reach this determination.</p>	<p>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 in the Administrative Record). Some of the areas reviewed were because of data provided by the public, but the BLM Interdisciplinary team reviewed all submitted data to ensure that the information was accurate. 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.</p>
Wilderness	Bill Barrett Corporation	<p>Nine Mile Canyon, Desolation Canyon and Jack Canyon Areas</p> <p>In sum, BLM's 2007 WCA determinations are arbitrary when compared to BLM's initial findings and the fact that continued development has occurred in post of these areas for the past thirty years. BLM's recent WCA determinations also arbitrary to the extent BLM relied upon SUWA information to reach this determination. SUWA's wilderness characteristics data contains serious factual errors, severe substantive omissions, and fundamental analytic flaws. Thus, SUWA submissions, and BLM's reliance and use of these inventories is arbitrary and not in conformance with FLPMA. BLM should not use these inventories as part of its final decision making process.</p>	<p>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 in the Administrative Record). Some of the areas reviewed were because of data provided by the public, but the BLM Interdisciplinary team reviewed all submitted data to ensure that the information was accurate. The BLM is confident of high-standard approach used to inventory the public lands and stands by its findings, particularly the findings, which involved</p>

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			wilderness characteristics inventory maintenance.
Wilderness	Bill Barrett Corporation	<p>With regard to the WCA area encompassed in the proposed Desolation Canyon ACEC, after analysis of these lands under NEPA, BLM concluded that “the non-WSA lands with wilderness characteristics do not possess outstanding opportunities on their own but rather in association with the Jack Canyon WSA.” EA at 4-25 (emphasis added). Thus, BLM determined in 2004, before additional development in this area was authorized by the Decision Record, that lands comprising this part of the Desolation Canyon WCA and ACEC proposal do not possess good opportunities for solitude and unconfined recreation. Id. It is apparent that these scenic values are not significant enough for ACEC designation.</p> <p>In sum, BLM’s analysis of lands with wilderness characteristics in the Supplement to the Price DRMP/EIS is flawed because the assumption and determination that these lands actually contain wilderness characteristics is unsupported. BLM’s analysis in Alternative E contains insufficient analysis why these lands provide outstanding opportunities for solitude and unconfined recreation. To support a decision to preserve and protect wilderness characteristics, BLM’s analysis must include actual recreational data on use and enjoyment of these lands, as well as data detailing how these lands provide outstanding opportunities for solitude and unconfined recreation, given the extensive development already occurring within and adjacent to these WCA areas.</p>	<p>The consideration of scenic values in the potential Desolation Canyon ACEC as relevant and important values is not directly affected by the presence or absence of wilderness characteristics, nor was the presence of wilderness characteristics a consideration in the review of potential relevant and important values in that area. The review of relevant and important values and the maintenance of wilderness characteristics inventory were separate and distinct processes.</p> <p>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 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.</p>
Wilderness	Bill Barrett Corporation	<p>BBC urges BLM to maintain its current policy of not imposing the FLPMA Section 603 non-impairment standard upon non-WSA lands with wilderness characteristics. Similarly, BBC urges BLM not to impose restrictions that would create a de facto non-impairment policy and unduly hinder minerals exploration and development activities.</p> <p>The IBLA has consistently held that the non-impairment standard does not apply to non-WSA lands, such as WIAs and citizen proposed wilderness areas. CEC, 161 IBLA 386, 395 (2004); CEC, 162</p>	<p>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</p>

		<p>IBLA 293, 300 fn9 (2004); SUWA, 163 IBLA 142, 148 (2004) (wilderness inventory units and WIAs “are not subject to the restrictions on surface disturbing activities afforded WSA’s by the non-impairment mandate of section 603 of FLPMA and do not affect the management or use of the public lands involved.”).</p>	<p>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.</p> <p>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.”</p> <p>Finally, the Utah v. Norton Settlement Agreement does not affect BLM’s authority to manage public lands. This Agreement merely remedied confusion by distinguishing</p>
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			<p>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.</p> <p>Non-WSA areas with wilderness characteristics managed to protect, preserve, and maintain those characteristics will be managed according to the prescriptions noted in Table 2-12 in chapter 2 of the Proposed RMP/Final EIS.</p>
Wilderness	Bjork, Lindley, & Little	Under Alternative E, the BLM proposes to close 937,440 acres of public lands that are not wilderness study areas (WSAs), but that allegedly have wilderness characteristics, to oil and gas leasing. Because the BLM inappropriately relied on outdated information to determine which non-WSA areas allegedly have "wilderness character," the BLM must reevaluate this information before basing management decisions on it.	Please see general comment response # 3
Wilderness	BlueRibbon Coalition	The agency appears to be arguing that its "Non WSA Lands with Wilderness Character" (sometimes herein referred to as "WC Areas") are not WSAs, and that FLPMA allows management for certain resources associated with Wilderness characteristics (appearance of naturalness, outstanding opportunities for primitive and unconfined recreation or solitude). Thus, BLM would appear to argue, the "Non WSA Lands with Wilderness Character" designation is legal and consistent with FLPMA and other laws.	Please see general comment response # 2
Wilderness	BlueRibbon Coalition	However, as Price BLM's Supplemental DEIS clearly indicates, the purpose of this effort concerns the inventory, review and management of BLM lands for potential inclusion in the National Wilderness Preservation System. Indeed, this process began during a Congressional hearing regarding a proposed Utah Wilderness bill. The agency itself relied upon that Congressional hearing to undertake a statewide Wilderness re-inventory. The inventory was briefly suspended by the federal courts, but once the inventory was completed, the agency then began a statewide planning process to establish new WSAs.	<p>The Supplement to the Price Field Office Draft RMP/EIS for Non-WSA Lands with Wilderness Characteristics never states that the intent of managing non-WSA lands with wilderness characteristics to protect, preserve, and maintain their wilderness characteristics is for potential inclusion in the National Wilderness Preservation System. The only time the National Wilderness Preservation System is mentioned in the Supplement is on page 2-4 in relation to WSA management.</p> <p>The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43</p>

			<p>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.</p> <p>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."</p>
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			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, as stated on pg. 3-2 of the Supplement.
Wilderness	BlueRibbon Coalition	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 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 WSAs, the BLM should have no part in this issue. To do so is a tragic loss of management resources.	Please see general comment response # 2
Wilderness	BlueRibbon Coalition	It is improper to make decisions based upon an inventory for a single resource value, in this case; 'Wilderness character'. Section 201 directs the Secretary to: "prepare and 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." It is clear from this language that all resource and other values on the public lands were to be part of a single inventory. When planning, there is no authorization for the agency to engage in inventories for a small segment (Wilderness) of only part of the spectrum of "resources and other values" (recreation). It is clear from the parenthetical phrase inserted in this section by Congress that Congress wanted the broadest range of resources and values considered and listed specifically two among the many which were to be included.	The Draft RMP/EIS and its supplements include six alternatives that provide different ways of managing the broad array of uses and resources. Wilderness characteristics are just part of the myriad of resources the BLM considers in the land use planning process. In addition to an inventory of wilderness characteristics, this planning effort used inventory information including, but not limited to range condition, cultural and paleontological resource inventories, route inventories, mineral location and development potential, recreation use patterns, and visual resources. The Norton-Leavitt Agreement recognizes that nothing in the Agreement should be construed to diminish the Secretary's authority under FLPMA to manage a tract of land that has been dedicated to a specific use. IM 2003-275-Change 1 which is a direct outcome of the Norton-Leavitt Agreement states, "the BLM may consider information on wilderness characteristics along with information on other uses and values when

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			<p>preparing land use plans. The IM goes on to say "considering wilderness characteristics in the land use planning process may result in several outcomes including, but not limited to, ...emphasizing the protection of some or all of the wilderness characteristics as a priority over other multiple uses" (although the area will not be designated as a WSA). The IM also states "typically, resource information contained in the BLM wilderness inventories was collected to support a land use planning process. Public wilderness proposals represent a land use proposal. In either case the BLM is authorized to consider such information in preparation of a land use plan amendment or revision."</p>
Wilderness	BlueRibbon Coalition	<p>One serious concern with utilizing the 1999 Inventory has to do with the lack of public involvement both in the development of inventory criteria. Again, BRC is not merely making semantic arguments. These concerns are directly related to the agency's congressional mandates and obligations to the public when developing management plans. In fact, although 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. Secretary Babbitt stated that his re-inventory team "is explicitly instructed to apply the same legal criteria that used in the original inventory." The re-inventory procedures document clearly shows that was not done. 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. However, the "Utah Wilderness Review Procedures" selectively adopts certain paragraphs and sentences from the original documents and even then often changing their arrangement or dropping and adding sentences. Secretary Babbitt had in fact created in the "Utah Wilderness Review Procedures" a new document without any public involvement or opportunity for review and comment. Clearly, the re-inventory document has a much lower threshold for what qualifies as "natural" than the one applied in the original inventory. BRC's members may be adversely affected by the inability to comment on and participate in the criteria used for the 1999 Inventory.</p>	<p>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 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.</p> <p>The BLM examined about 1,094,030 acres of lands for the existence of wilderness characteristics, including all lands within the Red Rock Wilderness Act. The BLM found that 937,440 acres of these lands contained</p>

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			wilderness characteristics and are proposed for protective management in Alternative E. The remaining 156,590 acres did not have wilderness characteristics based on the inventory maintenance conducted by the BLM between 1996 and 2007.
Wilderness	BlueRibbon Coalition	There is a fundamental incongruity in the Supplemental DEIS and Alternative E. The incongruity is this: The inventory criteria allows motorized recreation (and other non-confirming uses) but the management prescriptions categorically exclude motorized recreation (and other non-confirming uses). Is that not the definition of arbitrary and capricious?	CEQ NEPA regulations require the consideration of the full range of reasonable alternatives, which in the case of protecting, preserving and maintaining non-WSA lands with wilderness characteristics includes eliminating all uses that may result in impacts. In addition to Alternative E which closes non-WSA lands with wilderness characteristics to all uses that could possibly result in the loss of wilderness characteristics, the BLM also considered the No Action Alternative that results in over 36% of these areas open to cross country OHV use and only 1% closed to OHV use. By considering and analyzing this range, the BLM has been compliant with considering the full range of reasonable alternatives in relation to non-WSA lands with wilderness characteristics.
Wilderness	BlueRibbon Coalition	If Congress Releases WSAs from Wilderness Consideration • If released by Congress, these lands would be managed as non-WSA lands with wilderness characteristics under this alternative. Apparently it is necessary to point out that Price BLM's management prescriptions for WC lands provide more "protection" (or enhancement, or emphasis) for values associated with Wilderness.	The management of WSAs if released by Congress under Alternative E is consistent with the management philosophy of Alternative E, which is to protect, preserve and maintain areas with wilderness characteristics.
Wilderness	BlueRibbon Coalition	Table 3-19A is not accurate and must be revised. This error is representative of the fundamental flaws in this process. In order to provide information for the public and decision makers to use to compare and contrast this decision, Table 3-19A lists Designated Wilderness, WSA and Recommended Wilderness. But this is not an accurate disclosure of "lands are managed to protect wilderness characteristics." There are many areas managed under the "SPNM" and "P" recreation classes that are not included in this Table. The Table also fails to disclose management actions made pursuant to WO guidance that requires 'special consideration' (our term) of any management project contemplated for lands proposed for Wilderness by so-called "citizen groups." BRC understands that guidance has been implemented in the Price Field Office and formally request that	Table 3-19a has been relocated to the cumulative impacts section of Chapter 4 in the Proposed RMP/Final EIS. The commentor is correct in noting that in the suite of resources and uses managed on public lands throughout Utah there are resources other than wilderness that require restrictive management. However, those areas are not being managed for "to protect

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		<p>it be included in the analysis and in this Table. BLM may argue that those lands in a P or SPNM class are not directly associated with Wilderness. Such an argument is factually incorrect and also amplifies the fundamental problem with this planning effort. At the risk of sounding like a broken record, BLM here is attempting to incorporate planning guidance for recreational values with the planning guidance for inventory and review for Wilderness characteristics.</p>	<p>their wilderness characteristics" nor were they inventoried for wilderness characteristics. In a similar fashion, the ROS inventory for the Price Field Office was not used to identify or confirm the presence or boundaries of non-WSA lands with wilderness characteristics. Showing the various shades of prescriptive management for all land management agencies throughout the State of Utah would result in an inaccurate comparison or resources that are inventoried and managed for different purposes.</p> <p>There is no WO guidance that requires "special consideration...of any management project contemplated for lands proposed for wilderness." However, a U.S. District Court Decision (SUWA v Norton – 2:04CV574 DAK – August 1, 2006) determined that the BLM violated NEPA by "not taking a hard look" at a protective alternative and "by failing to consider significant new information about wilderness values and characteristics." The Supplement to the Price Field Office Draft RMP/EIS for Non-WSA Lands with Wilderness Characteristics and by extension the Proposed RMP/Final EIS provides the NEPA document in which such information is considered.</p>
Wilderness	BlueRibbon Coalition	<p>On page 1-2 of the Supplemental DEIS, in section 1.6.14 "Non-WSA Lands with Wilderness Characteristics" it states: In the development of this DRMP/DEIS, wilderness characteristics are considered in a manner commensurate with other resources. Really? How so? Alternative E contains no provision that indicates wilderness characteristics were considered in a manner commensurate with other resources. Alternative E is a blanket provision that provides maximum "wilderness protection" across all management prescriptions. And perhaps more importantly, the public isn't given any opportunity to understand let alone comment on the rationale behind Alternative E, i.e. why were no other resources given priority in any of the many WC Areas? What level or importance of a resource use would be required to allow it in a WC Area under the rationale</p>	<p>The Draft RMP/EIS and its supplements include six alternatives that provide different ways of managing the broad array of uses and resources. Wilderness characteristics are just part of the myriad of resources the BLM considers in the land use planning process. For example, Alternative E closes non-WSA lands with wilderness characteristics to all uses that could possibly</p>

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		for Alternative E?	result in the loss of wilderness characteristics, while the No Action Alternative that results in over 36% of these areas open to cross country OHV use and only 1% closed to OHV use and Alternative A results in 95% of the non-WSA lands with wilderness characteristics being open to oil and gas leasing with standard terms and conditions. By considering and analyzing this range, the BLM has been compliant with considering the full range of reasonable alternatives in relation to non-WSA lands with wilderness characteristics, as well as other resources and resource uses.
Wilderness	Bluerock Energy Corp.	Bluerock Energy Corp. is only one of several Mining Companies holding Valid Existing Federal Mining Claims within the San Rafael Swell Mining District. We note that our current valid mining claims are located, in part, within areas mapped as NonWSA Lands with Wilderness Characteristics. See attached PDF map file. With few exceptions, these claims are located in areas where historic mining activities, including but not limited to road building, mining that produced mine dumps, and other disturbances consistent with historic mining are still visible. We have data to be submitted at a later date to confirm this. We note that this evidence of historic use disturbances appear to be inconsistent with the definition of wilderness. Furthermore, it is apparent that our planned exploration, road building, and mining activities would be in conflict with many of the restrictions proposed for these areas in Alternative E. In addition, these areas do not clearly exhibit wilderness characteristics based on historic, current, and future uses.	<p>The BLM was aware of the intrusions identified by the commentor during the review to maintain its wilderness inventory. The BLM determined these intrusions to not substantially detract from the wilderness characteristics of the area. The BLM stands by its maintained inventory of non-WSA lands with wilderness characteristics.</p> <p>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. Potential impacts from development of existing leases within non-WSA lands with wilderness characteristics are disclosed in the Chapter 4</p>

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			portions of the Wilderness Characteristics Supplement. These potential impacts were taken into consideration when determining if an area should be managed for its wilderness characteristics or not.
Wilderness	Capital Trail Vehicle Association	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. 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.	Please see general comment response # 2
Wilderness	Carbon County Public Lands Department	How does cherry stemming improve the quality of the experience or solitude for the visitor? The Recreation Opportunity Spectrum was designed to allow for this. It would show that a three mile boundary is needed for primitive non-motorized recreation (PNMR.)	"Cherry stemming" is a land management technique that facilitates better land management by allowing ingress and egress without compromising a special designation. Where routes are adjacent to or cherry-stemmed within a non-WSA lands with wilderness characteristics, setbacks have been accorded to allow for removing the disturbance to naturalness from the inventory and to allow for maintenance of the existing route. The acreage of non-WSA lands with wilderness characteristics were determined to reflect the setbacks on boundary or cherry-stemmed routes. A required set-back from developed areas is not required to meet the naturalness criteria associated with the non-WSA lands with wilderness characteristics review.
Wilderness	Carbon County Public Lands Department	Desolation and Jacks Canyon non-WSA lands with wilderness characteristics: These areas do not qualify for protection because they do not possess these values. The proposed area from the Emery County line north is used for grazing complete with many range improvements, which needs maintenance with much energy potential throughout the area. While cherry stemming has been created on a map, it will not change the impact to the wilderness experience that a person could anticipate having. As far as resource use and development, mining claims are active in the southwestern portion of the area. BLM has recently issued a permit to Emery County for the construction of a road northwest of this area. The road will be designed to accommodate coal haul traffic and other traffic associated with the Lila Canyon Mine. The road will also provide access to stock ponds and other activities which occur in the area. The road is outside the proposed area, but visual and audible impacts can be expected.	As part of BLM's wilderness characteristics inventory maintenance for the Desolation Canyon area, BLM performed a combination of data and on-site reviews. Portions recommended for review in public comments were included from 1999 Inventory and 2002 Revision. OHV trails were known, as shown on Draft RMP/EIS map 2-54. Coal potential is recognized, as shown on Supplement map 2-70. Oil and gas potential is recognized, as shown on Supplement map 3-23. BLM did

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		<p>The entire northern portion of this proposed area has been used for natural gas production since the 1950's and is now under development for natural gas by Bill Barrett Corporation. Petro Canada has purchased parcels to develop in this area also. The West Tavaputs Plateau full field development EIS is now underway with a final decision expected by the middle of next year.</p>	<p>revise the Desolation non-WSA land with wilderness characteristics area in 2007 based on new oil and gas development activity. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p> <p>As part of BLM's wilderness characteristics inventory maintenance for the Jack Canyon area, BLM performed a combination of data and on-site reviews. This area was inventoried in 1999 and revised in 2002. OHV trails were known, as shown on Draft RMP/EIS map 2-54. The BLM revised the Jack Canyon non-WSA land with wilderness characteristics in its 2007 wilderness characteristics maintenance based on oil and gas development. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Carbon County Public Lands Department	<p>Ground observations in the Carbon County non-WSA lands with wilderness characteristics areas were conducted between October 8 and November 2, 2007. Observation of current or past human imprints within the WCA Alternative E was conducted within the WCA boundaries in Carbon County. The following features were documented:</p> <ul style="list-style-type: none"> • Vehicle routes, including Carbon County-claimed roads, ATV and motorcycle routes; • Utility rights-of-way; • Grazing activity, including fencing, fencing materials, corrals, and stock ponds; • Non-native vegetation; • Mineral development activity, including plugged oil and gas wells, claim markers and excavations; and • Abandoned home sites, campsites, construction debris, and garbage. 	Please see general comment response # 3
Wilderness	Carbon County Public Lands Department	<p>The Prickly Pear and Peters Point gas fields cover a large portion of the Carbon County WCA Alternative E. Active federal oil and gas leases cover much of the WCA Alternative E. Many of these leases are producing natural gas and currently tied to a Questar major sales line. Current lease areas are within the WCA Alternative E. Seven plugged and abandoned oil and gas wells and twenty</p>	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

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		<p>five producing wells are located within the study area. Four shut-in wells and one producing well have been "cherry stemmed" from the study area. A map illustrating the oil and gas wells is included as Figure 7.</p> <p>Since wilderness designation would not affect pre-existing federal leases or any state leases, development of these leases is reasonably foreseeable, with obvious impacts to the criteria applied to the determination of wilderness characteristic.</p> <p>Of the 12,230.91 acres of active federal leases located partially or wholly within the Study Area, approximately 7840 acres are located within the WCA- Alternative E.</p> <p>The ALT E contains 16 issued federal oil and gas leases and borders 13 active state oil and gas leases. There are 7,840 acres of federal leases and 7,752 acres of state leases issued within or bordering the WCA ALT E. There are 7 plugged and abandoned wells within the Study Area and 25 producing wells.</p>	<p>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. Potential impacts from development of existing leases within non-WSA lands with wilderness characteristics are disclosed in the Chapter 4 portions of the Wilderness Characteristics Supplement.</p>
Wilderness	Colorado 500	<p>Please add this passage to the Executive Summary for the FEIS and to the replacement for 1.6.14: "The Interior Board of Land Appeals (IBLA) has issued numerous decisions regarding the BLM's authority to establish new wilderness study areas. The following paragraphs are quotes from IBLA decisions. "The Bureau of Land Management's (BLM) authority to conduct wilderness reviews or establish new wilderness study areas expired on October 21, 1993, and absent Congressional authorization, BLM may not establish, manage or treat public lands, other than those designated wilderness by Congress under 43 U.S.C Sec. 1782(2000), as wilderness study areas or as wilderness under the land use planning provisions of the Federal Land Policy and Management Act of 1976 (FLPMA), 43 U.S.C. Sec. 1712 (2000). "Even where the land has been proposed for wilderness designation in pending legislation, BLM may properly administer those lands for other purposes, where the land has not been included in the wilderness study area. Because the time for taking appeals from inventory decisions has long since passed, the doctrine of administrative finality precludes appellants from challenging those decisions by filing protests against actions taken by BLM to administer the land for other purposes. (IBLA 2002-307, August 17, 2004.) "Once the decision has been made to reject land for inclusion in the wilderness preservation system, NEPA does not require subsequent analysis of the impacts of that determination, because such impacts were considered when the decision was made to administer them for other purposes. "Colorado Environmental Coalition," 161 IBLA at 396; "Southern Utah Wilderness Alliance," 158 IBLA 212,214-15 (2003); "Southern Utah Wilderness Alliance," 151 IBLA 338, 341-42 (2000); "Colorado</p>	Please see general comment response # 2

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		EnvironmentalCoalition," 149 IBLA at 156; "Southern Utah Wilderness Alliance," 150 IBLA 263, 266-67 (1999); "Colorado EnvironmentalCoalition," 142 IBLA 49, 52 (1997); "Southern Utah Wilderness Alliance," 128 IBLA 52, 65-66 (1993)."	
Wilderness	Emery County Public Lands Department	The county objects to the use of "cherry-stemming" routes, roads and trails to create non-WSA lands with wilderness characteristics.	"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.
Wilderness	Emery County Public Lands Department	Emery County doesn't recognize the validity of cherry-stemming features that are on the ground. We suggest setting back the boundary of a proposed WC from these features to a reasonable distance of between one and one half mile.	<p>"Cherry stemming" is a land management technique that facilitates better land management by allowing ingress and egress without compromising a special designation. Where routes are adjacent to or cherry-stemmed within a non-WSA lands with wilderness characteristics, setbacks have been accorded to allow for removing the disturbance to naturalness from the inventory and to allow for maintenance of the existing route. The acreage of non-WSA lands with wilderness characteristics were determined to reflect the setbacks on boundary or cherry-stemmed routes.</p> <p>A required set-back from developed areas is not required to meet the naturalness criteria associated with the non-WSA lands with wilderness characteristics review. In designating other wilderness areas throughout the country, Congress has not required a set-back from busy roads and man-made structures to ensure that sights and sounds are not present from the moment a user steps into the area. Requiring such a standard for non-WSA lands with wilderness characteristics would result in a higher standard than that implemented by Congress for many designated wilderness areas.</p>
Wilderness	Emery County	There exist many historic motorized routes within these WCs which need to be recognized even	Please see general comment response # 3

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	Public Lands Department	though they may not be designated as open. PFO has never completed a comprehensive inventory of these routes.	
Wilderness	Emery County Public Lands Department	Several of the proposed areas are within eyesight of two coal-fired, electrical power generating plants. Emissions stacks, steam from cooling towers and nocturnal lighting are highly visible. Emery County contends that drawing boundaries which exclude human activity within the proposed area doesn't eliminate the impact of that activity.	Please see general comment response # 15
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Cedar Mountain area because of the presence of range developments (e.g. water developments, fences) and routes required to maintain these facilities, the presence of support facilities (e.g. staging areas and increased traffic on roads) for helicopter-assisted UDWR trapping of Desert bighorn sheep, the presence of free-use permits for a gravel borrow area, and the existence of SITLA sections (one wholly contained within the area and two partially). However, Emery County believes the interior portion of this area possesses characteristics of naturalness which may at times provide opportunities for solitude and/or a primitive type of recreation.	As part of BLM's wilderness characteristics inventory maintenance for the Cedar Mountain area, BLM performed a combination of data and on-site reviews. Information on the area' western boundary was considered in the 1999 Inventory and 2002 Revision. BLM also reviewed OHV data in this area as part of the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Desolation Canyon area because of the presence of range developments (e.g. water developments, fences) and routes required to maintain these facilities, the presence of several existing and/or planned roads that are evident (visual and auditory) from within the area, the presence of reclaimed but still highly visible oil and gas exploration roads in "the Donut Hole," and prominent and visible well stems. Active coal leases and gas and oil leases within this area indicate that PFO has made management decisions for this area, and they are not conducive to protection of wilderness characteristics. In addition, current mining claims are active in the southwestern portion of the area. Most of the proposed area is not contiguous to the existing WSA atop the Book Cliffs but is separated by a BLM system road and an Emery County Road bisects the area. SITLA is advertising a Land Offering and Request for Proposal to Develop on a portion of its properties directly south and adjacent to the proposed Desolation Canyon WC area. The advertisement involves over 2,500 acres and will probably require ROWs to accommodate transportation and utilities on portions of land administrated by BLM.	As part of BLM's wilderness characteristics inventory maintenance for the Desolation Canyon area, BLM performed a combination of data and on-site reviews. Portions recommended for review in public comments were included from 1999 Inventory and 2002 Revision. OHV trails were known, as shown on Draft RMP/EIS map 2-54. Coal potential is recognized, as shown on Supplement map 2-70. Oil and gas potential is recognized, as shown on Supplement map 3-23. BLM did revise the Desolation non-WSA land with wilderness characteristics area in 2007 based on new oil and gas development activity. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Devil's Canyon area because a significant potion of this area contains gypsum reserves and much of it is under current mining claims. Although the active UDOT gravel pit has been cherry-stemmed out of	As part of BLM's wilderness characteristics inventory maintenance for the Devil's Canyon area, BLM performed a combination of data

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		<p>the area, periodic activity in the pit (including asphalt production) will visually and audibly impact much of the area. I-70 and the traffic it carries also greatly impact the northern reaches of this area. The “Copper Globe Loop” is extremely popular with ATV and motorcycle riders, and groups of varying sizes are common along this route and on other adjacent routes designated ‘open’ by the 2003 Route Designation Plan.</p>	<p>and on-site reviews. Portions recommended for review in public comments were added in the 1999 Inventory and 2002 Revision. BLM also reviewed OHV data in this area as part of the 2003 San Rafael Route Designation Plan. Gypsum potential is recognized, as shown on Supplement map 2-64. Gravel potential is recognized, as shown on Supplement map 2-65. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.</p>
Wilderness	Emery County Public Lands Department	<p>Emery County objects to the findings of the BLM’s wilderness characteristics inventory for the Eagle Canyon area because this area is adjacent to active gypsum mines and several sections within the proposed area are under active mining claims. The active mines, though not within the proposed area, impact the area visually and audibly. BLM notes in a re-inventory evaluation that “roads and ways, fences, oil and gas drill sites, stock ponds, a spring development, and gully plug check dams” were present in the area and Emery County’s documentation shows these impacts are substantially noticeable, as are other developments within the unit. Additionally, Emery County Road #803 is being realigned and reconstructed. Traffic use and traffic speed are anticipated to increase, which will visually and audibly impact the area. The presence of designated motorized routes, other non-designated routes, active mining claims, an adjacent highway, visual contact with active mines and a three unit, 1100 megawatt (mw) power plant eliminates opportunities for primitive recreation.</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Eagle Canyon area, BLM performed a combination of data and on-site reviews. The 2007 review took into consideration the 2003 San Rafael Route Designation Plan. Gypsum potential is recognized, as shown on Supplement map 2-64. The Moore road is a boundary, and therefore not within the area. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.</p>
Wilderness	Emery County Public Lands Department	<p>Emery County objects to the findings of the BLM’s wilderness characteristics inventory for the Flat Tops area because of the presence of a well site and active mining claims in the southeastern portion of the area, eliminating a large portion from legitimate wilderness characteristic management. Active gas and oil leases within this area are not conducive to protection of wilderness characteristics. Emery County also has a permitted free use permit for clay on the northeastern boundary of this area.</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Flat Tops area, BLM performed a combination of data and on-site reviews. The 2002 review took into consideration all available information. Existing oil and gas leases were documented, as shown on Supplement map 3-23. Clay potential is recognized, as shown on Supplement map 2-65. The inventory used OHV information from the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM’s</p>

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			wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	<p>Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Hondu Country area because of the presence of the Red Canyon Loop OHV route that receives more use all the time, the presence of two well defined routes that penetrate the area from the eastern border, and the presence of a free use permit to Emery County adjacent to the proposed area, providing the only gravel source in the McKay Flat area.</p> <p>However, Emery County believes the interior portion of this area possesses characteristics of naturalness which may at times provide opportunities for solitude and/or a primitive type of recreation.</p>	As part of BLM's wilderness characteristics inventory maintenance for the Hondu Country area, BLM performed a combination of data and on-site reviews. The Red Canyon loop is a boundary for the area, and therefore not within the area. OHV routes were identified for the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Labyrinth Canyon area because of the existence of several routes throughout the area, usually leading to other human disturbances, the existence of several active gas and oil leases, that are not conducive to protection of wilderness characteristics.	As part of BLM's wilderness characteristics inventory maintenance for the Labyrinth Canyon area, BLM performed a combination of data and on-site reviews. Portions recommended for review in public comments were included from 1999 Inventory and 2002 Revision. OHV routes were identified and considered in the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Lost Springs Wash area because the northern end of the proposed area has active mining claims, including an active stone quarry. Drilling and shooting have been used to quarry the white sandstone at the site. Active gas and oil leases within this area are not consistent with management for wilderness characteristics. A new hole was drilled at the same site in 2007 and has another drill site surveyed within the area and another immediately adjacent. This area has also been managed to accommodate motorized recreation in the past and continues to be used for this purpose, as evidenced by BLM's acknowledgement that "numerous ATV, motorcycle and jeep trails appear throughout the unit" and that "Special Recreation Permits have been issued over the years for organized motorcycle events." The permits required that nearly all of the routes used in the races have archeological inventories completed. Finally, the WCR says the area is "likely to provide profound feelings of solitude" and visitors "will find conditions along the Old Spanish Trail...much as they were in the early 1800's". Emery County points out that the route of the Old Spanish Trail follows a BLM system road which is outside the boundary of the proposed area, and the	As part of BLM's wilderness characteristics inventory maintenance for the Lost Springs Wash area, BLM performed a combination of data and on-site reviews. This review took into consideration SRP's for motorcycle events, the rail road line, OHV trails shown on Draft RMP/EIS map 2-54, Chimney rock trail system, O/G leases shown on Supplement map 3-23, and gravel potential shown Supplement map 2-65. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.

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		uncompleted Denver, Rio Grande and Western Railroad grade is also found along the route which has substantially altered the landscape from its condition in the 1800's, as has other development visible within and adjacent to the area.	
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Mexican Mountain area because of the presence of several prominent and highly used OHV routes both within and adjacent to the area, including about three miles of County Road #410 that lies within the re-inventory area but is not reflected in the map. Specifically, the area is bounded on the southwest by County Road #332, the main route through the San Rafael Swell to I-70 and is highly used, year round. The Black Dragon Road bounds the southern end as is visually and audibly adjacent to I-70. In addition, the Rocky Mountain Power power line ROW is adjacent to the area, with towers visible for miles, as are prominent cuts and fills from the historic railroad grade the power line follows. Finally, past and present free use permit areas include Sid's Draw, Oil Well Draw and the wash bottom in T20S, R11E, Sec 33. These gravel sources are all wash bottoms which are naturally replenishing and self reclaiming.	As part of BLM's wilderness characteristics inventory maintenance for the Mexican Mountain area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002 revision. Many of the features raised by commentor as intrusions are on the area's boundary, and therefore not within the area. OHV routes were considered, as shown on Draft RMP/EIS map 2-54. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Molen Reef area because of the visibility of extensive human activity from within the inventoried area (Rocky Mountain Power's power line is immediately adjacent to the area; a non-designated motorized route runs north-south through the extreme western end of the area with an historic coal mine and pond along this route). At least four OHV routes have been designated and are open for use on the reef. A good part of the routes are used as boundaries for the proposed area, but the fact that they are a boundary and not within the area doesn't lesson the impact of their use upon the interior of this area. Four other designated routes penetrate the area from the north and east. The southern boundary of the area is within a few hundred feet of I-70 and the associated traffic. All these disturbances within and adjacent to the area limit the opportunities associated with wilderness characteristics.	As part of BLM's wilderness characteristics inventory maintenance for the Molen Reef area, BLM performed a combination of data and on-site reviews. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. Gravel potential is recognized, as shown on Supplement map 2-65. Gypsum potential is recognized, as shown on Supplement map 2-64. Several of the roads specifically identified in public comments are cherry-stemmed, and therefore are not within the area. Many of the features raised by commentors as intrusions are on the area's boundary, and therefore not within the area. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Muddy Creek – Crack Canyon area because of the presence of mining claims and the associated	As part of BLM's wilderness characteristics inventory maintenance for the Muddy Creek-

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	Department	<p>interest in the gypsum resources in this area, the presence of extensive mining activity clustered at the Lucky Strike mine, the presence of BLM system roads, designated trails and other motorized routes in the area that accommodate major motorized recreation, the presence of active mining claims in the Hidden Splendor, Little Susan areas as well as the presence of historic remnants of abundant mining activity visible in these areas, as well as along the historic routes which uranium exploration created. In addition, the vicinity of Oil Well Dome is pockmarked with gas wells and is a known reservoir for gas. Active gas and oil leases within this area are not consistent with management for wilderness characteristics.</p> <p>However, Emery County believes the Penitentiary Canyon vicinity of this WC area possesses characteristics of naturalness which may at times provide opportunities for solitude and/or a primitive type of recreation.</p>	<p>Crack Canyon area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002 revision. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. BLM was aware of past uranium mining activity, as evidenced by the potential Uranium Mining District ACEC, as well as uranium potential shown on Supplement map 2-64. Several of the roads specifically identified in public comments are cherry-stemmed, and therefore are not within the area. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Emery County Public Lands Department	<p>Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Mussentuchit Badland area because there are certainly enough routes, ponds and other evidences to eliminate most of the area from management for wilderness characteristics.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Mussentuchit area, BLM performed a combination of data and on-site reviews. The 1999 wilderness characteristics inventory and the 2002 revisions discuss the sand dunes on the east of the area. Two roads are cherry-stemmed, and therefore are not within the area. BLM considered OHV routes by incorporating the inventory from the 2003 San Rafael Route Designation Plan. Clay potential is recognized, as shown on Supplement map 2-65. The BLM also recognizes that the eastern boundary is bisected by a County road from the western boundary of Cedar Mountain WC area. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Emery County Public Lands	<p>Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Never Sweat Wash area because the BLM's acknowledgement that "numerous ATV, motorcycle and jeep</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Never Sweat</p>

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	Department	trails appear throughout the unit but are not maintained except by the passage of vehicles” should make the case for not managing for wilderness characteristics. These routes are routinely used and it is Emery County’s desire that they be incorporated into the proposed Chimney Rock Trail System. Emery County believes that when evidence of motorized use is apparent, the area is not suitable for management of wilderness characteristics. Additionally, active gas and oil leases within this area are not consistent with management for wilderness characteristics.	Wash area, BLM performed a combination of data and on-site reviews. This review took into consideration SRP’s for motorcycle events, the rail road line, OHV trails shown on Draft RMP/EIS map 2-54, Chimney rock trail system, O/G leases shown on Supplement map 3-23, and gravel potential shown Supplement map 2-65. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM’s wilderness characteristics inventory for the Price River area because the re-inventory area is one of the most highly impacted areas being considered for management of wilderness characteristics, with a county road, BLM system roads, four wheeler trails and single track motorcycle trails nearly everywhere except where the lay of the land is simply too rough to be ridden. Active gas and oil leases within this area are not consistent with management for wilderness characteristics.	As part of BLM’s wilderness characteristics inventory maintenance for the Price River area, BLM performed a combination of data and on-site reviews. The 2002 wilderness characteristics review included data on OHV routes (see also Draft RMP/EIS map 2-54). The 2007 wilderness characteristics inventory already reviewed additional acreage recommended by public comments. Oil and gas potential was considered as shown on Supplement map 3-23. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM’s wilderness characteristics inventory for the Rock Canyon area because several routes penetrate this area from the west, mostly for the purpose of accessing livestock associated features, including ponds and troughs, the presence of active mining claims in the north, west, and south portions of the area.	As part of BLM’s wilderness characteristics inventory maintenance for the Rock Canyon area, BLM performed a combination of data and on-site reviews. The routes that penetrate the area from the west that public comments raised were identified in the 2002 wilderness characteristics review. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands	Emery County objects to the findings of the BLM’s wilderness characteristics inventory for the San Rafael Knob area because except for the slick rock feature of the Knob itself, the area is permeated	As part of BLM’s wilderness characteristics inventory maintenance for the San Rafael

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	Department	by roads, designated routes, historic mine exploration routes and other evidences of human activity. The designated routes in this area and in the surrounding areas are some of the most highly used in the San Rafael Swell. BLM has chosen to manage the area to accommodate large numbers of motorized users by designating open motorized routes and maintaining roads in the area.	Knob area, BLM performed a combination of data and on-site reviews. The 2007 wilderness characteristics review took into account the route inventory from the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the San Rafael Reef area because this proposed area is highly used for motorized recreation. Designated routes abound in all parts of this unit. A series of single track trails within this unit are extremely popular and continually draws riders from surrounding states. Other motorized routes exist that were not designated open in the 2003 plan, but are still highly visible.	As part of BLM's wilderness characteristics inventory maintenance for the San Rafael Reef area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002 revision. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the San Rafael River area. Seismic lines, BLM system roads, county roads, designated routes, fence lines, water wells and other features are frequent enough within the area that it should not be managed for wilderness characteristics. In fact, Emery County maintains approximately 13.5 miles of road within this unit. Active gas and oil leases within this area are not consistent with management for wilderness characteristics.	As part of BLM's wilderness characteristics inventory maintenance for the San Rafael River area, BLM performed a combination of data and on-site reviews. The 2002 wilderness characteristics inventory summarized the area containing the features identified in public comments. Most of the miles of routes raised in public comment are cherry stemmed County roads, and therefore are not within the area. The San Rafael River bisects the area. The BLM considered OHV routes by incorporating the inventory from the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.

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Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Sid's Mountain area because the northern portion of this unit contain the remnants of a town site constructed for a Department of Defense project, tunnels constructed for the same project as well as craters from above ground explosive discharges, an open pit gypsum mine in the first year of reclamation and a newly permitted open pit gypsum mine. These areas are also extremely popular destinations, both local visitors those coming from outside the area. The Wedge Overlook Road (County Road #405) runs directly through the midst of the proposed area and records traffic counts in the hundreds. Designated routes, as well as non-designated routes, are plentiful in the area and receive high use. Improved surface roads, improved campsites and vault toilets are not indicative of wilderness characteristics.	As part of BLM's wilderness characteristics inventory maintenance for the Sid's Mountain area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002 revision near the "wedge". The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. Gypsum potential is recognized, as shown on Supplement map 2-64. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the South Horn Mountain area. Coal bed methane gas drilling has extended to near the southern edge of unit B but has not extended into the proposed unit." Emery County has provided photographic evidence of motorized trails, non-designated roads, an historic coal mine and a cherry stemmed gas well pad in this area. Two other dry wells were punched but have been reclaimed. Several fence lines cross the area. Additionally, the proximity of the area to other human amenities should leave no doubt that the proposed area should not be considered for this type of management. PFO says "sites and sounds of man's activities are easily observed from within the unit."	As part of BLM's wilderness characteristics inventory maintenance for the South Horn Mountain area, BLM performed a combination of data and on-site reviews. In response to some public comments, it is important to note that Forest Service "roadless areas" do not equate to "wilderness areas." The BLM will only consider areas adjacent to the Forest when the Forest Service "administratively endorses" the area as wilderness or if the area meets the size criteria. The 2007 wilderness characteristics inventory considered the Rock Canyon Road, which bisects the area. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Sweetwater Reef area because of the existence of many motorized trails and roads that follow decades old seismic exploration lines that, while faint, are definitely noticeable. Free use permits issued by the PFO within or adjacent to this area includes Spire Point, Dugout Springs and Saucer Basin.	As part of BLM's wilderness characteristics inventory maintenance for the Sweetwater Reef area, BLM performed a combination of data and on-site reviews. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003

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			San Rafael Route Designation Plan. Gravel potential is recognized, as shown on Supplement map 2-65. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Turtle Canyon area because of the existence of historic motorized routes within the area, some of them accessing drill sites, and the presence of recoverable coal reserves underlie the area. Active coal leases are not consistent with management for wilderness characteristics.	As part of BLM's wilderness characteristics inventory maintenance for the Turtle Canyon area, BLM performed a combination of data and on-site reviews. The 1999 Inventory and 2002 Revision considered OHV trails, as shown on Draft RMP/EIS map 2-54. Coal potential is recognized, as shown on Supplement map 2-70. Oil and gas potential is recognized, as shown on Supplement map 3-23. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Upper Muddy Creek area because while the area is composed of very rugged terrain, with few routes or human created features, there are some routes, ponds, historic mining features that shouldn't be ignored. An old road parallels the Muddy Creek for probably more than half of the distance the creek travels through the area.	As part of BLM's wilderness characteristics inventory maintenance for the Upper Muddy Creek area, BLM performed a combination of data and on-site reviews. The 1999 inventory was updated in 2002, although additional areas proposed by some commentors were not found to have wilderness characteristics and were not added. During the 2002 maintenance, the BLM identified the several routes that some commentors identified. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Emery County Public Lands Department	Emery County objects to the findings of the BLM's wilderness characteristics inventory for the Wild Horse Mesa area because the area is bisected by a road which follows Wild Horse Creek, and the area is bounded by SR-24 that is a two lane highway which serves as a major north-south route and a major access to Lake Powell, as well as another Emery County Road on the northeastern boundary which is currently being realigned, widened and paved to handle the increasing visitation. Additionally, Emery County has a permitted free use permit in the Little Wild Horse Wash. This is a	As part of BLM's wilderness characteristics inventory maintenance for the Wild Horse Mesa area, BLM performed a combination of data and on-site reviews. In the 2002 update of the 1999 inventory, additional areas were added. No new information was submitted

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		<p>very important material source and will be needed for future road projects.</p> <p>However, Emery County believes the interior portion of this area possesses characteristics of naturalness which may at times provide opportunities for solitude and/or a primitive type of recreation.</p>	<p>that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Emery County Public Lands Department	<p>The Never Sweat Wash area should not be considered for management for wilderness characteristics since a written proposal hasn't been submitted.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Never Sweat Wash area, BLM performed a combination of data and on-site reviews. This review took into consideration SRP's for motorcycle events, the rail road line, OHV trails shown on Draft RMP/EIS map 2-54, Chimney rock trail system, O/G leases shown on Supplement map 3-23, and gravel potential shown Supplement map 2-65. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	EOG Resources Inc.	<p>The BLM utilized outdated and possibly biased information to identify non-wilderness study areas (WSA) with wilderness characteristics. The BLM utilized information gathered during its 1999 re-inventory and also information received during the scoping and public comment periods in the land use planning process (RMP development). Information received during public comment periods typically is biased to reflect the prevailing sensibilities of the commenter. The BLM must, however, rely upon objective data with which to take the required "hard look."</p> <p>The BLM must consider that the 1999 re-inventory does not include activities or development that may have occurred since that time. Approximately eight years have transpired, during which time characteristics such as naturalness, opportunities for solitude or primitive and unconfined recreation may have changed or been lost. The BLM's Vernal FO has recently (February 2007) re-evaluated areas that were described as exhibiting wilderness</p>	<p>Please see general comment response # 3</p>

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		<p>character in 1999. It determined that some areas have lost their naturalness, etc., and that those areas no longer display wilderness characteristics. The</p> <p>Price FO must also consider the most current information available and make an independent appraisal before reaching a management decision for the 937,440 acres that may or may not display wilderness characteristics.</p>	
Wilderness	Fidelity Exploration and Production Co.	<p>That BLM also utilized updated information to identify non-wilderness study area lands with wilderness characteristics. This information was gathered during BLM's 1999 reinventory. BLM must consider that the 1999 reinventory does not include activities or development that may have occurred since that time. Approximately eight years has transpired, during which time characteristics such as naturalness, opportunities for solitude, or primitive and unconfirmed recreation may have been changed or been lost. The BLM's Vernal FO has recently re-evaluated areas that were described as exhibiting wilderness character in 1999. It determined that some areas have lost their naturalness, etc., and that those areas no longer display wilderness characteristics. The Price FO must also consider the most current information available and make an independent appraisal before reaching a management decision for the 937,440 acres that may or may not display wilderness characteristics.</p>	Please see general comment response # 3
Wilderness	Independent Petroleum Association of Mountain States (IPAMS)	<p>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 U.S.C. §1714. Some of these decisions may exceed the authority granted BLM under its organic act.</p> <p>FLPMA is the organic statute for the BLM. Under FLPMA, BLM is required to manage public lands under the principles of multiple use and sustained yield, in accordance with applicable land use plans, to meet the needs of present and future generations. 43 U.S.C. § 1701(a)(7), (8) & (12); 43 U.S.C. § 1732(a) & (b); 43 C.F.R. § 1610.5-3. FLPMA identifies "mineral exploration and production" as one of the "principle or major uses" of public lands. See 43 U.S.C. § 1702(l).</p> <p>"Multiple use" and environmental organizations' desire for pristine public lands (i.e. "wilderness") are mutually exclusive concepts. FLPMA's definitions of multiple use and the major uses of public lands highlight the on-going extraction and utilization of natural resources on public lands for the benefit of the American people. 43 U.S.C. § 1702(c). Indeed, "wilderness" is conspicuously not a term used as a principle or major use of public lands under FLPMA.</p>	Please see general comment response # 2
Wilderness	Independent	While the BLM has a duty under section 201 to inventory lands, including those that may contain	In a September 20, 2006 ruling on State of

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	<p>Petroleum Association of Mountain States (IPAMS)</p>	<p>“wilderness characteristics,” the BLM may not unlawfully apply the WSA nonimpairment 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. The BLM must still provide for multiple use even if certain lands contain what the 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.</p>	<p>Utah v Norton (Case No. 296-CV-0870), Judge Benson from the U.S. District Court stated in that “the Settlement does not...strip the BLM of its powers to protect lands it determines to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected when designated as WSAs. In other words, the Settlement does not affect the BLM's rights or obligations to manage land with wilderness characteristics in a manner that will leave those characteristics unimpaired.” Judge Benson later states, “Utah and the BLM...recognize that the BLM has discretion to manage its lands in a manner that is similar to the non-impairment standard of the IMP. The Court concludes that the Settlement is consistent with FLPMA and properly interprets the BLM's authority under section 202.”</p> <p>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).</p> <p>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</p>
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			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.
Wilderness	Independent Petroleum Association of Mountain States (IPAMS)	FLPMA required the BLM to conduct an inventory of all public lands under its responsibility, which the agency completed before 1980. After considering all BLM lands, the remaining lands were released from consideration as wilderness. 45 Fed. Reg. 75574, 74575 (“[State Director] decisions also identify 149,262,000 acres as lacking wilderness characteristics; these will not be considered further in the wilderness review”). The Interior Board of Land Appeals (“IBLA”) and the Courts have never recognized broad BLM authority to create wilderness study areas beyond the wilderness review period. Such a broad decision would be contrary to the case law holding that the time period for designating WSAs has passed. Creating broad authority for the BLM to designate new WSAs and manage these lands as if they were wilderness would also ignore the inventories and wilderness reviews that the BLM undertook of all lands under its administration. See 45 Fed. Reg. 75574.	Please see general comment response # 2
Wilderness	Independent Petroleum Association of Mountain States (IPAMS)	The time for the BLM to create and recommend lands for wilderness designation under FLPMA has expired and those lands not included as wilderness study areas should return to the productive, multiple use status envisioned by FLPMA.	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.
Wilderness	Independent Petroleum Association of Mountain States	Subjective judgments are used to bolster their wilderness characteristics claim. SUWA has not met the burden of providing valid and complete data to substantiate their land use proposals. In addition, the Wilderness Characteristics Review that the BLM undertook in 2007 to analyze the WCAs appears to be a desk review only. Without ground truthing the WCAs, it is not possible to thoroughly	Please see general comment response # 3

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	(IPAMS)	determine what lands have wilderness characteristics and what lands should be excluded from WCA designation. For example, there are two tracks that have been used extensively, so much so that even though they are not mechanically maintained, they are more of a road than a two track. A desk review is not adequate to determine this, and ground truthing is necessary to determine whether these areas still contain wilderness characteristics. However, the BLM has done only a sample of the WCAs, for example 10 acres out of 86,543 in Desolation Canyon ¹ . Surely an entire WCA designation for 86,543 acres from a 10 acre sample that may or may not be representative is not sufficient grounds for closing an area off to exploration and development, and the BLM should not close access to the WCAs.	
Wilderness	Independent Petroleum Association of Mountain States (IPAMS)	Many of the boundaries have been “cherry stemmed” to go around a road or other structure that would otherwise disrupt the continuity of the area, thereby making a mockery of the criterion for wilderness designation of 5,000 acres of contiguous undisturbed land. This arbitrary drawing of boundaries enables the designation of wilderness in land that really by any common sense analysis does not meet the criterion of undisturbed land.	During the inventory maintenance of non-WSA lands with wilderness characteristics boundaries were identified along, but not including, linear physical disturbances (routes, pipelines, etc.) on a case-by-case basis that allowed for the determination of the level of impact the disturbance had on the surrounding landscape. This methodology has been implemented in wilderness areas designated by Congress and WSAs established through the FLPMA Section 603 wilderness review, and is not a methodology unique to the BLM inventory of non-WSA lands with wilderness characteristics.
Wilderness	Independent Petroleum Association of Mountain States (IPAMS)	WCAs should have a set-back boundary of a reasonable distance (1 mile to 1.5 miles) from human imprints to account for sight and sound intrusions upon solitude and unconfined and primitive recreation. In the event that such setbacks result in a non-contiguous wilderness characteristics area, then the BLM should automatically "delist" the area as containing wilderness characteristics. It defies common sense to have a busy road or a man-made structure right on the boundary of a WCA and call that land that immediately abuts that road or structure wilderness.	Please see general comment response # 15
Wilderness	Independent Petroleum Association of Mountain States (IPAMS)	The maps in Appendix A and the well list in Appendix B show the numerous active producing wells, plugged and abandoned wells, dry holes, and shut-in wells within the proposed WCAs. These examples on the maps of existing human impacts seem to negate the assertion that many of these WCAs have wilderness characteristics. These examples call into question the analysis that determined that these lands meet the criteria for wilderness-like protection.	The BLM was aware of the intrusions identified by the commentor during the review to maintain its wilderness inventory. The BLM determined these intrusions to not substantially detract from the wilderness characteristics of the area. The BLM stands by its maintained inventory of non-WSA lands with wilderness characteristics.
Wilderness	Independent Petroleum	On page 2-22 of the Supplement, the BLM states that if WSAs are released by Congress, then these former WSA lands would be managed as WCAs under Alternative E. If Congress chooses not to	Commentor is correct is noting that if Congress releases WSAs from further

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	<p>Association of Mountain States (IPAMS)</p>	<p>designate an area as wilderness, then BLM is not obligated to further preserve those lands under non-impairment management proscriptions. Rather, these lands should revert back to standard public lands open for multiple use management by BLM. IPAMS strongly urges the BLM to drop that proposal from Alternative E, and insure it does not make it into the ROD.</p>	<p>consideration for wilderness designation, those lands would be managed according to the multiple use standard required by FLPMA. However, 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)). 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. Alternative E presents an alternative methodology for managing WSAs if released by Congress. This provides the decisionmaker a range of alternatives from which to develop the Proposed RMP and eventually the Final RMP/ROD.</p>
<p>Wilderness</p>	<p>National Outdoor Leadership School</p>	<p>Non-WSA Lands with Wilderness Characteristics: Developing a strong Leave No Trace ethic among recreationists can help preserve the primitive characteristics of these lands. Whether motorized or non-motorized, users who take strides to minimize their impacts on the ecosystem enhance the</p>	<p>The BLM supports the Leave No Trace ethics for all recreation users. Nothing in the Propose RMP/Final EIS would impinge on</p>

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		experience for everyone. NOLS and OIA encourage the BLM to find opportunities to teach the public about Leave No Trace so that we all may be careful stewards of the land.	BLM's ability to identify opportunities to educate the public about Leave No Trace principles to minimize impacts to the environment and to enhance the recreation experience.
Wilderness	Public Lands Policy Coordination	The BLM is a key participant in The Utah Partners for Conservation and Development (UPCD) and the Utah Watershed Restoration Initiative. The inability to implement habitat restoration projects on BLM lands identified as WSA or wilderness characteristic lands would impede the UPCD's ability to restore and maintain healthy watersheds.	The Proposed RMP/Final EIS has been modified so non-WSA areas managed to protect, preserve and maintain wilderness characteristics will still be "...available for range improvements, vegetative and fire treatments and Healthy Lands Initiatives." WSAs are managed according to the IMP (BLM-H-8550-1), so adjusting management within those areas to allow such treatments is outside the scope of this RMP.
Wilderness	Public Lands Policy Coordination	Thus, 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.	Please see general comment response # 2
Wilderness	Public Lands Policy Coordination	Further, the BLM must fully disclose the rationale and evidence which it believes supports a changed finding for those lands found not to have wilderness characteristics in the first survey in the late 1970s and early 1980s. Such rationale and evidence must contain a discussion of the detailed criteria used, nature and extent of the review, detailed field notes, and all other relevant evidence and legal reasoning. See 43 USC Section 1701 (1) and Utah Code Section 63-38d-401(6)(b).	Please see general comment response # 3
Wilderness	Public Lands Policy Coordination	The BLM should give strong consideration to recommendations submitted by local government and not manage lands to protect wilderness character where such management would, in the opinion of local governments, be contrary to the interests of local residents.	Secs. 103, 201, and 202 of FLPMA direct the BLM to take into account the national interest as well as the local interest. The BLM must provide management for all resources and resource uses on public lands. Strong consideration was given to local governments as Carbon and Emery Counties are cooperating agencies in the entire land use planning process including in the development of alternatives where non-WSA areas with wilderness characteristics were considered.
Wilderness	Public Lands Policy Coordination	Please clarify whether the Price Field Office incorporated set-backs next to a road, pipeline, or other right of way. If the Price Field Office chose to forego buffers, please explain why BLM adopted this	Please see general comment response # 15

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		divergent approach.	
Wilderness	Public Lands Policy Coordination	Based on the information provided, it appears that wilderness characteristics determinations for the following areas were made without the assistance of either a site visit or review of aerial photography. Please clarify what information was considered in evaluating the following areas: Desolation Canyon, Price River Extension, Never Sweat Wash, Lost Spring Wash, Sweetwater Reef, San Rafael Knob, Molen Reef, Eagle Canyon, South Horn Mountain, Wildcat Knolls Extension, Flat Tops, Rock Canyon.	Please see general comment response # 3
Wilderness	Public Lands Policy Coordination	Page 4-391 of the 2004 DEIS indicates that the Price Field Office will consider additional areas for withdrawals, including WSAs, suitable wild and scenic river segments, and the Three Rivers proposed withdrawal.	The withdrawal portion of the Lands and Realty section has been revised to address this concern.
Wilderness	Public Lands Policy Coordination	The supplement discloses that the presence of “vehicles, and equipment” within lands with wilderness characteristics, and near cultural or paleontological sites, may impact these sites and reduce opportunities for solitude. 2007 Supp at 4-13 - 4-14. Please clarify what vehicle and equipment uses are allowed within and/or are anticipated to interfere with sites or sites or solitude within lands with wilderness characteristics.	The portions of the document to which the commentor refers describes the impacts to non-WSA lands with wilderness characteristics from cultural and paleontological resources management, which includes the potential for scientific excavation and study. The vehicles and equipment would be that associated with such excavation(s), approved on a case-by-case basis by the Authorized Officer.
Wilderness	Public Lands Policy Coordination	Never Sweat Wash and Lost Spring Wash should not have been considered because it contains numerous ATV, motorcycle and jeep trails throughout the unit, organized motorcycle events, the proposed Chimney Rock Trail System, drift and boundary fences, stock ponds and water developments. See Wilderness Characteristics Review for Never Sweat Wash at 2-3 and Wilderness Characteristics Review for Lost Spring Wash at 2-3.	Please see general comment response # 13
Wilderness	Public Lands Policy Coordination	Eagle Canyon – it appears that the Price Field Office did not conduct a site visit, review aerial photographs or state and county road information, or otherwise independently evaluate the existence of wilderness characteristics.	As part of BLM’s wilderness characteristics inventory maintenance for the Eagle Canyon area, BLM performed a combination of data and on-site reviews. The 2007 review took into consideration the 2003 San Rafael Route Designation Plan. Gypsum potential is recognized, as shown on Supplement map 2-64. The Moore road is a boundary, and therefore not within the area. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.

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Wilderness	Public Lands Policy Coordination	Flat Tops – The State questions that this area contains wilderness characteristics.	As part of BLM's wilderness characteristics inventory maintenance for the Flat Tops area, BLM performed a combination of data and on-site reviews. The 2002 review took into consideration all available information. Existing oil and gas leases were documented, as shown on Supplement map 3-23. Clay potential is recognized, as shown on Supplement map 2-65. The inventory used OHV information from the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Public Lands Policy Coordination	Molen Reef – Specifically, please explain whether the Price Field Office conducted a site visit, reviewed aerial photographs, reviewed state and county road information, or took any other steps to independently evaluate the existence of wilderness characteristics.	As part of BLM's wilderness characteristics inventory maintenance for the Molen Reef area, BLM performed a combination of data and on-site reviews. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. Gravel potential is recognized, as shown on Supplement map 2-65. Gypsum potential is recognized, as shown on Supplement map 2-64. Several of the roads specifically identified in public comments are cherry-stemmed, and therefore are not within the area. Many of the features raised by commentators as intrusions are on the area's boundary, and therefore not within the area. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Public Lands Policy Coordination	Rock Canyon – Please identify and discuss all additional investigations BLM conducted to determine that the Rock Canyon area possess wilderness characteristics.	As part of BLM's wilderness characteristics inventory maintenance for the Rock Canyon area, BLM performed a combination of data and on-site reviews. The routes that penetrate the area from the west that public

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			comments raised were identified in the 2002 wilderness characteristics review. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Public Lands Policy Coordination	South Horn Mountain – The Wilderness Characteristics Review form for this unit notes that the “sites and sounds of man’s activities are easily observed from within this unit. Opportunities for solitude may be limited to isolated canyon location, only.” Please reconcile this statement with the requirement for outstanding opportunities for solitude or primitive and unconfined recreation.	As part of BLM’s wilderness characteristics inventory maintenance for the South Horn Mountain area, BLM performed a combination of data and on-site reviews. In response to some public comments, it is important to note that Forest Service “roadless areas” do not equate to “wilderness areas.” The BLM will only consider areas adjacent to the Forest when the Forest Service “administratively endorses” the area as wilderness or if the area meets the size criteria. The 2007 wilderness characteristics inventory considered the Rock Canyon Road, which bisects the area. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.
Wilderness	Public Lands Policy Coordination	Wild Horse Mesa – Please explain what additional investigations the Price Field Office undertook and how these establish the existence of wilderness character.	As part of BLM’s wilderness characteristics inventory maintenance for the Wild Horse Mesa area, BLM performed a combination of data and on-site reviews. In the 2002 update of the 1999 inventory, additional areas were added. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.
Wilderness	Questar Exploration & Production Company	BLM must disclose the information used to determine that these lands meet the wilderness criteria and how the boundaries were designated.	The Wilderness Characteristics Supplement to the Draft RMP/EIS, section 3.2.11 (Non-WSA Lands with Wilderness Characteristics) describes what information was used in maintaining the BLM’s wilderness inventory for the Price Field Office. As explained in that section, “detailed information about non-WSA

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			lands with wilderness characteristics is part of the administrative record for the RMP.” That section of the Supplement also notes that “the following records are available for public review at the PFO: 1) 1999 Utah Wilderness Inventory; 2) 1999 Utah Wilderness Inventory Revision Document for the PFO; 3) 1999 Utah Wilderness Inventory Case Files for the PFO; 4) Reasonable Probability Determinations for the PFO; and 5) Documentation of Wilderness Characteristics Review for the PFO.” Including all this information in the Final EIS would be unwieldy when the summary as contained in the Supplement describes the results of maintaining the inventory.
Wilderness	Questar Exploration & Production Company	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.	The impacts analysis within the Wilderness Characteristics Supplement to the Draft RMP/EIS does acknowledge that some impacts from energy development are temporary, explaining that in some instances reclamation can occur to the point that an “intrusion is substantially unnoticeable [in about] 5 to 10 years.” (see page 4-47 of Supplement).
Wilderness	Questar Exploration & Production Company	BLM must ensure that its decisions comply with the Energy Policy Act (EPA 2005), the 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 U.S.C. § 1701(a)(7), (8) & (12); 43 U.S.C. § 1732(a) & (b); 43 C.F.R. § 1610.5-3. FLPMA identifies “mineral exploration and production” as one of the “principle or major uses” of public lands. See 43 U.S.C. § 1702(l). The removal of expansive acreage from leasing and development in the PFO does not comply with BLM objectives.	Please see general comment response # 2
Wilderness	Sage Riders Motorcycle Club	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. 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 is a tragic loss of management resources.	Please see general comment response # 2

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Wilderness	Sage Riders Motorcycle Club	<p>Sage Riders Motorcycle Club objects to the findings of the BLM's wilderness characteristics inventory for the Never Sweat Wash area because this area has numerous full-sized roads (including Class B and D categories), jeep roads (non-improved), ATV trails (two-track, 54") and single-track motorcycle trails (24" trails). The northeast section of this proposed area is adjacent to State Highway 6; noise from this traffic corridor will impact the solitude factor of this area as well as the visual aspect. Numerous mining, oil and gas claims are found within this area, including several active leases with recent exploratory drilling in this area. Significant and noticeable impacts from past mining and drilling activities include several capped well sites that involved the use of heavy mechanized equipment (bulldozers) are found in the proposed area. There are several historic homesteads and home sites within this proposal. There are several range improvements for livestock grazing, including stock ponds, corals, gates, cattle guards and fencing. There are also service ponds constructed and maintained by bulldozers within this area. The Union Pacific Railroad has an active line and in some instances forms the border of this proposed area. Noise and site impairments from several trains on a daily basis impact the solitude factor. The BLM permitted motorcycle races where held in this area in 1982, 1983, 1985, 1986, 1996, 1997, 1998, 2002 and 2003. The SRMPs for these races included EAs completed by Price Field Office and allowed for the competitive event and associated logistical considerations such as latrines, marking the course and camping. Each of these events had averaged approximately 250 participants with an additional 500+ support crews & families. Finally, the proposed area is adjacent to or within 10 "school sections" which are owned and managed by SITLA, four of which are completely surrounded by the proposed action.</p> <p>Geo-referenced photographic evidence attached to the accompanying CD will clearly show substantial human disturbances that would not substantiate this area as meeting the criteria outlined and defined by the Wilderness Act and BLM Instructional Memorandum 2003-725.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Never Sweat Wash area, BLM performed a combination of data and on-site reviews. This review took into consideration SRP's for motorcycle events, the rail road line, OHV trails shown on Draft RMP/EIS map 2-54, Chimney rock trail system, O/G leases shown on Supplement map 3-23, and gravel potential shown Supplement map 2-65. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Sage Riders Motorcycle Club	<p>Sage Riders Motorcycle Club objects to the findings of the BLM's wilderness characteristics inventory for the Lost Springs Wash area because this has numerous full-sized roads (including Class B and D categories), jeep roads (non-improved), ATV trails (two track, 54") and single-track motorcycle trails (24" trails). The Green River Cutoff Road (Emery County Road EM401), which serves as the northern boundary for this proposal is a major travel route.). The southeast section of this proposed area is adjacent to State Highway 6; noise from this traffic corridor will impact the solitude factor of this area as well as the visual aspect. Numerous mining claims are found within this area. There is significant and noticeable impacts from past mining and drilling activities include several capped well sites that involved the use of heavy mechanized equipment (bulldozers) to construct the roads and pads for the drilling activities within the proposed WC area. There are several homesteads and home sites within this proposal. There are also several range improvements for livestock grazing, including stock ponds, corals, gates, cattle guards and fencing. There are also service ponds constructed and maintained by bulldozers within this area. The Union</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Lost Springs Wash area, BLM performed a combination of data and on-site reviews. This review took into consideration SRP's for motorcycle events, the rail road line, OHV trails shown on Draft RMP/EIS map 2-54, Chimney rock trail system, O/G leases shown on Supplement map 3-23, and gravel potential shown Supplement map 2-65. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance</p>

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		<p>Pacific Railroad has an active line adjacent to the area; noise and site impairments impact the solitude factor. BLM permitted motorcycle races where held in this area in 1982, 1983, 1985, 1986, 1996, 1997, 1998, 2002 and 2003. The SRMPs for these races included EAs completed by Price Field Office and allowed for the competitive event and associated logistical considerations such as latrines, marking the course and camping. Each of these events had averaged approximately 250 participants with an additional 500+ support crews & families. Finally, the proposed area is adjacent to or within 10 "school sections" which are owned and managed by SITLA, five of which are completely surrounded by the proposed action.</p> <p>Geo-referenced photographic evidence attached to the accompanying CD will clearly show substantial human disturbances that would not substantiate this area as meeting the criteria outlined and defined by the Wilderness Act and BLM Instructional Memorandum 2003-725.</p>	process.
Wilderness	Sage Riders Motorcycle Club	<p>Sage Riders Motorcycle Club objects to the findings of the BLM's wilderness characteristics inventory for the Price River area because this area has numerous full-sized roads (including Class B and D categories), jeep roads (non-improved), ATV trails (two track, 54") and single track motorcycle trails (24" trails). The northeast section of this proposed area is adjacent to State Highway 6; noise from this traffic corridor will impact the solitude factor of this area as well as the visual aspect. Numerous mining, oil and gas claims are found within this area. Significant and noticeable impacts from past mining and drilling activities include several capped well sites that involved the use of heavy mechanized equipment are found in the proposed area. There are several historic homesteads and home sites within this proposal. There are several range improvements for livestock grazing, including stock ponds, corals, gates, cattle guards, fencing, and service ponds. The Union Pacific Railroad has an active line in close proximity to this area; noise and site impairments from several trains on a daily basis impact the solitude factor. The proposed area is adjacent to or within 14 "school sections" which are owned and managed by SITLA, 10 of which are completely surrounded by the proposed action. There are also several tracts of private property that border the proposal in several areas, managed, to a large extent, according to the desires of the landholder that in most cases will not be consistent with wilderness characteristics management. This will also impact the visual and solitude aspects of any adjacent proposals for wilderness characteristics.</p> <p>Geo-referenced photographic evidence attached to the accompanying CD will clearly show substantial human disturbances that would not substantiate this area as meeting the criteria outlined and defined by the Wilderness Act and BLM Instructional Memorandum 2003-725.</p>	As part of BLM's wilderness characteristics inventory maintenance for the Price River area, BLM performed a combination of data and on-site reviews. The 2002 wilderness characteristics review included data on OHV routes (see also Draft RMP/EIS map 2-54). The 2007 wilderness characteristics inventory already reviewed additional acreage recommended by public comments. Oil and gas potential was considered as shown on Supplement map 3-23. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Sage Riders Motorcycle Club	<p>Sage Riders Motorcycle Club objects to the findings of the BLM's wilderness characteristics inventory for the Eagle Canyon area because there are numerous full-sized roads (including Class B</p>	As part of BLM's wilderness characteristics inventory maintenance for the Eagle Canyon

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		<p>and D categories) and jeep roads (non-improved), including the Dutch Flat Road on the northern boundary and the Moore Cutoff Road on the southern boundary. The volume of traffic on these two roads will impact the visual aspect as well as the solitude aspect of the proposal. The Moore Cutoff Road is a high traveled route and is currently under construction and will be paved by the fall of 2008. Additionally, Interstate 70 is within eye view of the proposal; travel noise from the vehicles using this interstate can be heard for over five miles inside of the proposed area, impacting the solitude factor of this area as well as the visual aspect. Numerous mining, oil and gas claims are found within this area. Mining leases are located near the southeastern boundary of the proposal. Significant and noticeable impacts from past mining and drilling activities include several capped well sites that involved the use of heavy mechanized equipment. There is also an active gypsum mine south of the boundary. Noise from heavy machinery and trucks can be heard within the proposed boundary and will impact the solitude factor. In addition, dust and other associated activities with the mineral extraction will also impact visual factors as observed from the proposed area. There are several range improvements for livestock grazing, including stock ponds, corals, gates, cattle guards, fencing, and service ponds. Finally, the proposed area is adjacent to or within nine "school sections" which are owned and managed by SITLA, six of which are completely surrounded by the proposed action.</p> <p>Geo-referenced photographic evidence attached to the accompanying CD will clearly show substantial human disturbances that would not substantiate this area as meeting the criteria outlined and defined by the Wilderness Act and BLM Instructional Memorandum 2003-725.</p>	<p>area, BLM performed a combination of data and on-site reviews. The 2007 review took into consideration the 2003 San Rafael Route Designation Plan. Gypsum potential is recognized, as shown on Supplement map 2-64. The Moore road is a boundary, and therefore not within the area. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Sage Riders Motorcycle Club	<p>Sage Riders Motorcycle Club objects to the findings of the BLM's wilderness characteristics inventory for the Molen Reef area because there are numerous full-sized roads (including Class B and D categories) and jeep roads (non-improved), including the Moore Cutoff Road on the northern boundary. The Moore Cutoff Road is a high traveled route and is currently under construction and will be paved by the fall of 2008. The volume of traffic on this road will impact the visual aspect as well as the solitude aspect of the proposal. Additionally, Interstate 70 is within view of much of the proposed area, impacting the solitude factor of this area as well as the visual aspect. Numerous mining, oil and gas claims are found within this area. Mining leases are located near the northern and western boundaries of the proposal. Significant and noticeable impacts from past mining and drilling activities include several capped well sites that involved the use of heavy mechanized equipment. There is also an active gypsum mine southeast of the boundary. Although not in the area, noise from heavy machinery and trucks can be heard within the proposed boundary and will impact the solitude factor. In addition, dust and other associated activities with the mineral extraction will also impact visual factors as observed from the proposed area. Several homesteads and home sites are found within this proposal. There are several range improvements for livestock grazing, including stock ponds, corals, gates, cattle guards, fencing, and service ponds. The</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Molen Reef area, BLM performed a combination of data and on-site reviews. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. Gravel potential is recognized, as shown on Supplement map 2-65. Gypsum potential is recognized, as shown on Supplement map 2-64. Several of the roads specifically identified in public comments are cherry-stemmed, and therefore are not within the area. Many of the features raised by commentators as intrusions are on the area's boundary, and therefore not within the area. No new information was submitted that has not already been</p>

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		<p>proposed area is adjacent to or within eight "school sections" which are owned and managed by SITLA, six of which are completely surrounded by the proposed action. There are also several tracts of private property that border the proposal in several areas, managed, to a large extent, according to the desires of the landholder that in most cases will not be consistent with wilderness characteristics management. This will also impact the visual and solitude aspects of any adjacent proposals for wilderness characteristics.</p> <p>Geo-referenced photographic evidence attached to the accompanying CD will clearly show substantial human disturbances that would not substantiate this area as meeting the criteria outlined and defined by the Wilderness Act and BLM Instructional Memorandum 2003-725.</p>	<p>considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Sage Riders Motorcycle Club	<p>Sage Riders Motorcycle Club objects to the findings of the BLM's wilderness characteristics inventory for the San Rafael Reef area because there are numerous full-sized roads (including Class B and D categories), jeep roads (non-improved) and single track motorcycle trails (24" trails, Temple Mountain Single Track Trail System). The Temple Mountain Cutoff Road, a major travel route for recreational users and cattlemen from Interstate 70 to the Temple Mountain and surrounding areas, serves as the western boundary of this proposal. The volume of traffic and associated sound and dust from this road will impact the visual aspect as well as the solitude aspect of the proposal. Additionally, Interstate 70 serves as the northeastern boarder of this proposal; travel noise from the vehicles using this interstate can be heard for over five miles inside of the proposed area, impacting the solitude factor of this area as well as the visual aspect. Significant and noticeable impacts from past mining and drilling activities include several capped well sites that involved the use of heavy mechanized equipment. Several homesteads and home sites are found within this proposal. There are several range improvements for livestock grazing, including stock ponds, corals, gates, cattle guards, fencing, and service ponds. Finally, the proposed area is adjacent to or within 11 "school sections" which are owned and managed by SITLA, six of which are completely surrounded by the proposed action.</p> <p>Geo-referenced photographic evidence attached to the accompanying CD will clearly show substantial human disturbances that would not substantiate this area as meeting the criteria outlined and defined by the Wilderness Act and BLM Instructional Memorandum 2003-725.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the San Rafael Reef area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002 revision. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Sage Riders Motorcycle Club	<p>Sage Riders Motorcycle Club objects to the findings of the BLM's wilderness characteristics inventory for the South Horn Mountain area because there are several full-sized roads (including Class B and D roads). Rock Canyon Road serves as the northern boarder of this proposal. This is a highly used road for access to the Rock Canyon ATV trailhead and for cattleman servicing ponds, stock ponds, and access to mineral claims that are located adjacent to the area. A canal service road is also found within the unit near the southeast boarder. This service route is frequently used to</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the South Horn Mountain area, BLM performed a combination of data and on-site reviews. In response to some public comments, it is important to note that Forest Service</p>

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		<p>inspect and repair the canal that provides water for farms and for the Hunter Power Plant. The volume of traffic on the Rock Canyon primarily and the canal service road secondarily will impact the visual aspect as well as the solitude aspect of the proposal. State Highway 10 is within sight and hearing distance of this proposed area. Noise from this traffic corridor, including coal trucks every two minutes, will impact the solitude factor of this area as well as the visual aspect. There is at least one active developed well site with in this proposal. Significant and noticeable impacts from past mining and drilling activities include several capped well sites that involved the use of heavy mechanized equipment. There are several range improvements for livestock grazing, including stock ponds, corals, gates, cattle guards, fencing, and service ponds. The proposed area is adjacent to or within two "school sections" which are owned and managed by SITLA, one of which is completely surrounded by the proposed action. Finally, the MillSite Reservoir, managed by the Utah State Parks, provides the southwest boarder of this proposal. MillSite Reservoir is highly used park for swimming, fishing, boating and watercraft. Engine noise from water skiing boats, fishing boats and fishing boats can be heard in several areas. The view of these crafts and engine noise impacts the solitude of the area.</p> <p>Geo-referenced photographic evidence attached to the accompanying CD will clearly show substantial human disturbances that would not substantiate this area as meeting the criteria outlined and defined by the Wilderness Act and BLM Instructional Memorandum 2003-725.</p>	<p>"roadless areas" do not equate to "wilderness areas." The BLM will only consider areas adjacent to the Forest when the Forest Service "administratively endorses" the area as wilderness or if the area meets the size criteria. The 2007 wilderness characteristics inventory considered the Rock Canyon Road, which bisects the area. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	Sage Riders Motorcycle Club	<p>Sage Riders Motorcycle Club objects to the findings of the BLM's wilderness characteristics inventory for the Muddy Creek-Crack Canyon area because there are numerous full-sized roads (including Class B and D categories), jeep roads (non-improved) and the Waterfall single track motorcycle trail (24" trail). Several Emery County Roads either travel within or provide a boarder for much the proposal. These county travel routes are heavily traveled by users accessing Wild Horse Mesa, Hidden Splendor Mine, Tomsich Butte, Keesle Country, the Hondu, McKay Flat and Behind the Reef. The volume of traffic on theses roads will impact the visual aspect as well as the solitude aspect of the proposal. Numerous mining, oil and gas claims are found within this area. Significant and noticeable impacts from past mining and drilling activities are evident that involved the use of heavy mechanized equipment that are found in the proposal. Several homesteads and home sites are found within this proposal. There are several range improvements for livestock grazing, including stock ponds, corals, gates, cattle guards, fencing, and service ponds. The proposed area is adjacent to or within 29 "school sections" which are owned and managed by SITLA, 12 of which are completely surrounded by the proposed action. This proposal is also within the vicinity of the Goblin Valley State Park. Goblin Valley State Park attracts thousands of visitors each year. These visitors will impact the solitude of the proposal.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Muddy Creek-Crack Canyon area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002 revision. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. BLM was aware of past uranium mining activity, as evidenced by the potential Uranium Mining District ACEC, as well as uranium potential shown on Supplement map 2-64. Several of the roads specifically identified in public comments are cherry-stemmed, and therefore are not within the area. No new information was submitted that has not already been considered in BLM's wilderness</p>

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		Geo-referenced photographic evidence attached to the accompanying CD will clearly show substantial human disturbances that would not substantiate this area as meeting the criteria outlined and defined by the Wilderness Act and BLM Instructional Memorandum 2003-725.	characteristics inventory maintenance process.
Wilderness	Sage Riders Motorcycle Club	<p>Sage Riders Motorcycle Club objects to the findings of the BLM's wilderness characteristics inventory for the Desolation Canyon, Jack Canyon, Turtle Canyon areas because there are numerous full-sized roads (including Class B and D categories) and jeep roads. The Green River Cutoff Road, which serves as the southern boundary for this proposal, is a major travel route. The western section of this proposed area is adjacent to State Highway 6, which is a major (high volume) traffic corridor for the State of Utah. Noise from this traffic corridor will impact the solitude factor of this area as well as the visual aspect. Numerous mining, oil and gas claims are found within this area, including active gas leases and plans for a coal mine. Significant and noticeable impacts from past mining and drilling activities include several capped well sites that involved the use of heavy mechanized equipment. Several homesteads and home sites are found within this proposal. There are several range improvements for livestock grazing, including stock ponds, corals, gates, cattle guards, fencing, and service ponds. The Union Pacific Railroad has an active line in the vicinity of this area. Noise and site impairments from several trains on a daily basis impact the solitude factor. The proposed area is adjacent to or within numerous "school sections" which are owned and managed by SITLA, many of which are completely surrounded by the proposed action.</p> <p>Geo-referenced photographic evidence attached to the accompanying CD will clearly show substantial human disturbances that would not substantiate this area as meeting the criteria outlined and defined by the Wilderness Act and BLM Instructional Memorandum 2003-725.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Desolation Canyon area, BLM performed a combination of data and on-site reviews. Portions recommended for review in public comments were included from 1999 Inventory and 2002 Revision. OHV trails were known, as shown on Draft RMP/EIS map 2-54. Coal potential is recognized, as shown on Supplement map 2-70. Oil and gas potential is recognized, as shown on Supplement map 3-23. BLM did revise the Desolation non-WSA land with wilderness characteristics area in 2007 based on new oil and gas development activity. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p> <p>As part of BLM's wilderness characteristics inventory maintenance for the Jack Canyon area, BLM performed a combination of data and on-site reviews. This area was inventoried in 1999 and revised in 2002. OHV trails were known, as shown on Draft RMP/EIS map 2-54. The BLM revised the Jack Canyon non-WSA land with wilderness characteristics in its 2007 wilderness characteristics maintenance based on oil and gas development. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>

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			As part of BLM's wilderness characteristics inventory maintenance for the Turtle Canyon area, BLM performed a combination of data and on-site reviews. The 1999 Inventory and 2002 Revision considered OHV trails, as shown on Draft RMP/EIS map 2-54. Coal potential is recognized, as shown on Supplement map 2-70. Oil and gas potential is recognized, as shown on Supplement map 3-23. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness	Sage Riders Motorcycle Club	The "cherry stemming" or "circling" of areas containing significant human impacts provides much proof that these areas DO NOT qualify as WC lands.	"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 Price Draft RMP/EIS.
Wilderness	SE Utah Association of Local Governments	Insofar as BLM presumes to possess the authority to manage Non-WSA public lands for the protection of "wilderness characteristics" without express authority from Congress, BLM exceeds its express statutory authority as set down in, and limited by, Sec. 603 of FLPMA and Sec. 2(a) of the 1964 Wilderness Act, and BLM usurps and assumes to itself and the role of Congress in setting down the terms, processes and time-frames under which the public lands may be devoted to the management of, or preservation of, "wilderness characteristics."	Please see general comment response # 2
Wilderness	SE Utah Association of Local Governments	The present intentions of BLM to manage certain non-WSA public lands for their own legend Non-Wilderness characteristics differs rhetorically but not substantively from that practice which, under Utah v. Norton, the Department disavowed. Insofar as BLM may proceed with management of certain non-WSA public lands for the protection of alleged wilderness characteristics, BLM and is defying the terms and object of the Norton settlement and, thereby, compromising the ethics and integrity of the Department of Interior as party to the settlement.	Please see general comment response # 2
Wilderness	Shell Exploration	Alternative E is the most restrictive for multiple uses of public lands, since in all practicality, this alternative allows one predominant land use, "wilderness". All other alternatives allow for multiple land uses in some degree or fashion. Restricting over 60% of all lands managed by the PFO to one	Please see general comment response # 3

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		land use is quite drastic considering these lands have significant value for other land uses including grazing, mining, oil & gas, and off Highway vehicle use. Since Alternative E is so restrictive, the process of evaluating potential wilderness characteristics and designating non-WSA "wilderness" areas for management as wilderness should be much more rigorous and site-specific. All special land use designation areas should be subject to a thorough evaluation or re-evaluation using all methods available including "ground-truthing" surveys and other 3rd party validation.	
Wilderness	Shell Exploration	No legal or regulatory mandate exists for prohibiting multiple use activities on non-WSA land with wilderness characteristics. Alternative E arbitrarily designates substantial areas of non-WSA lands with purported wilderness characteristics for management to maintain their supposed wilderness characteristics without apparent regard to other resource values and without explaining the regulatory and technical basis for such a designation of these areas.	Please see general comment response # 2
Wilderness	SouthEastern Utah OHV Club	The SEUOHVclub is 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 is now between Congress and the American people. Other than the management of existing WSAs, the BLM should have no part in this issue and to do so would obviate the FLPMA mandate, USC §1702 (c) ("Section 103(c)", of MULTIPLE USE.	Please see general comment response # 2
Wilderness	The Wilderness Society	The Supplement identifies lands with wilderness characteristics as "including naturalness and outstanding opportunities for solitude or primitive recreation, and are greater than 5,000 acres or adjacent to WSAs." Supplement, p. 3-2. However, BLM's guidance does not require the simultaneous presence of all of these wilderness characteristics or specify any minimum acreage in order to justify management to protect them.	There is no guidance that requires the BLM to consider non-WSA lands with wilderness characteristics on areas that are less than 5,000 acres. In identifying non-WSA land with wilderness characteristics, the BLM has followed the definition of wilderness contained in the Wilderness Act, recognizing it as the only legal definition of what wilderness is.
Wilderness	The Wilderness Society	The guidance does not include a requirement for the lands at issue to generally comprise 5000-acre parcels or a requirement that the lands have all of the potential wilderness characteristics in order to merit protection. Further, the guidance specifically contemplates management to protect "some or all" of the wilderness characteristics and to manage for one specific characteristic; so, for instance, the guidance would support managing an area to protect its naturalness as a priority over other multiple uses.	There is no guidance that requires the BLM to consider non-WSA lands with wilderness characteristics on areas that are less than 5,000 acres. In identifying non-WSA land with wilderness characteristics, the BLM has followed the definition of wilderness contained in the Wilderness Act, recognizing it as the only legal definition of what wilderness is.
Wilderness	The Wilderness Society	The acreage of non-WSA lands with wilderness characteristics should be revised to include all of the lands outside WSAs included in the America's Red Rock Wilderness Act.	All areas included in the America's Red Rock Wilderness Act proposal were reviewed by

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			the Price BLM Interdisciplinary Team for the presence of wilderness characteristics, in addition to other areas that were identified during public comment periods and through BLM inventory. The BLM found that 937,440 acres of these lands contained wilderness characteristics (see Table 3-19 of the wilderness characteristics supplement) and are proposed for protective management under Alternative E. The remaining areas of the Red Rock proposal did not have wilderness characteristics based on the inventory maintenance conducted by the BLM between 1996 and 2007.
Wilderness	The Wilderness Society	While BLM assessed all remaining UWC areas outside the 1999 Utah Wilderness Inventory (Revised 2002), the agency failed to utilize SUWA's supplemental and new information concerning many overlooked wilderness character areas. These areas are all contiguous to previously identified Wilderness Inventory Areas (WIAs). These areas include, the Cedar Mountain, Devils Canyon, Labyrinth Canyon, Mexican Mountain, Muddy Creek – Crack Canyon, Mussentuchit Badlands, Price River, San Rafael Reef, Sids Mountain, Upper Muddy Creek, and Wild Horse Mesa WIAs. SUWA and others maintain that in each area the current extent of identified wilderness character falls short of reality (i.e. the lands that continue to have a natural appearance and are not significantly impacted by man's activity). BLM should have utilized this new information in the production of the Supplement to fully account for and to provide the public with an accurate assessment of the wilderness resources within the Price Field Office. For these areas, we reference the comments SUWA supplied to the BLM.	Please see general comment response # 3
Wilderness	The Wilderness Society	In addition, BLM's recent WCR arbitrarily excludes or fails to identify many natural and wilderness character quality lands contiguous to the Manti-La Sal National Forest. These BLM wilderness quality lands are part of a larger roadless and wilderness character landscape and are not physically separated by a significant impact. The BLM states that it relies on "established BLM practice with wilderness inventories" when requiring that lands under the jurisdiction of the Forest Service or some other agency be endorsed for wilderness designation in order for adjacent BLM lands to meet the wilderness character and size requirement in combination with the Forest Service, or some other agency, lands. The April 2003 settlement agreement (Utah Settlement) between then Secretary of the Interior Norton and the State of Utah rescinded the BLM's Manual Handbook, Wilderness Inventory and Study Procedures (H-6310-1), as per the terms of "Rescission of National Level Policy Guidance on Wilderness Review and Land Use Planning (IM 2003-195)." Therefore, this BLM wilderness inventory policy, the most recent "established wilderness inventories," and established BLM practice regarding wilderness inventories have also been rescinded. Thus, BLM's current guidance must rely exclusively on the Wilderness Act and the Federal Lands Policy and	The process used to evaluate non-WSA lands with wilderness characteristics is described in Chapter 3 of the Proposed RMP/Final EIS. Language was added to Section 3.2.11 of the Proposed RMP/Final EIS to clarify the relationship of the size of an area to its inventory status. For lands to qualify for consideration, they needed to be 5,000 acres in size, adjacent to areas administratively endorsed for wilderness by another Federal agency, or "of sufficient size as to make practicable its preservation and use in an unimpaired condition," as described

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		<p>Management Act (FLPMA).</p> <p>Neither of these acts contain any provision or guidance directing that non-BLM lands adjacent to BLM lands need to be “administratively endorsed for wilderness” in order for the BLM lands to be aggregated for the determination of wilderness characteristics. Thus, the BLM has acted improperly in excluding lands with wilderness characteristics because it refuses to aggregate those lands with all wilderness quality lands managed by other agencies, not just those lands endorsed for wilderness designation.</p>	<p>in the Wilderness Act.</p>
Wilderness	The Wilderness Society	<p>Cedar Mountain Wilderness Character Area:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating an error in the unit’s western wilderness character boundary. Unfortunately, no supplemental BLM information confirming that BLM updated this unit’s wilderness character boundary as indicated has been provide to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA’s previous Draft RMP comments concerning this unit’s wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Cedar Mountain area, BLM performed a combination of data and on-site reviews. Information on the area’ western boundary was considered in the 1999 Inventory and 2002 Revision. BLM also reviewed OHV data in this area as part of the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>Desolation Canyon Wilderness Character Area:</p> <p>BLM eliminates wilderness character of an area that has not been significantly impacted. This area of wilderness character is confirmed by BLM’s recent 1999 Utah Wilderness Inventory of the Desolation Canyon Wilderness Inventory Area, Unit 1, in which BLM found this particular area’s high mesas retained and did retain a natural and wilderness character despite BLM’s flawed 1970’s inventories. This present wilderness character determination then just vanishes as a result of a new BLM wilderness character review. This review and Supplement go on to arbitrarily exclude this natural area by justifying that the planned or future activity by oil and gas development will eventually render this area significantly impacted. This is completely the wrong approach to identifying, accounting or just acknowledging a resource, any resource, and in this particular satiation, a wilderness resource.</p> <p>Currently and to date, no physical or significant impacts have affected the area substantially or to the point that the area fails to retain a natural appearance and wilderness character. BLM errs on this</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Desolation Canyon area, BLM performed a combination of data and on-site reviews. Portions recommended for review in public comments were included from 1999 Inventory and 2002 Revision. OHV trails were known, as shown on Draft RMP/EIS map 2-54. Coal potential is recognized, as shown on Supplement map 2-70. Oil and gas potential is recognized, as shown on Supplement map 3-23. BLM did revise the Desolation non-WSA land with wilderness characteristics area in 2007 based on new oil and gas development activity. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory</p>

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		<p>wilderness character determination by accounting for the “potential” of new oil and gas activity, but this activity has yet to affect the character of the landscape. This is unjustified as the resource of wilderness continues to exist at the time of the Supplement.</p> <p>An analogy would be where the BLM has a population of 40 endangered cacti in a vast are of BLM lands. Of this 40 cacti, BLM knows that eventually 10 will be impacted by oil and gas development, so only accounts for 30 for its RMP planning purposes, although the 10 endangered cacti exist at the time of this planning. The full account of this resource has not been disclosed to the public and BLM’s planning is therefore not accurate. This is the case with BLM arbitrarily eliminating the area where oil and gas development may exist in the future, but not now.</p>	<p>maintenance process.</p>
Wilderness	The Wilderness Society	<p>Devils Canyon Wilderness Character Area:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating an error in the unit’s western wilderness character boundary. Unfortunately, no supplemental BLM information confirming that BLM updated this unit’s wilderness character boundary as indicated has been provide to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA’s previous Draft RMP comments concerning this unit’s wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p> <p>In addition, the route that proceeded from the Copper Globe Mine area to the south has not been designated as open for motorized vehicle use under the San Rafael Route Designation Plan. This, and the lack of motorized vehicle use over the past six years or so has dramatically lessened the character of this route and its affect on the naturalness of the immediate area and Devils Canyon wilderness character area. As a result, the route and lands to the east appear to be natural in appearance within being significantly impacted. BLM will need to adjust the extent of wilderness character here.</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Devil’s Canyon area, BLM performed a combination of data and on-site reviews. Portions recommended for review in public comments were added in the 1999 Inventory and 2002 Revision. BLM also reviewed OHV data in this area as part of the 2003 San Rafael Route Designation Plan. Gypsum potential is recognized, as shown on Supplement map 2-64. Gravel potential is recognized, as shown on Supplement map 2-65. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>Jacks Canyon Wilderness Character Unit:</p> <p>This situation is the same situation as with of the Desolation Canyon wilderness character unit.</p> <p>Again, this area is yet to be significantly impacted by human activity and this is confirmed by BLM’s</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Jack Canyon area, BLM performed a combination of data and on-site reviews. This area was inventoried in 1999 and revised in 2002. OHV trails were known, as shown on Draft RMP/EIS map 2-54. The BLM revised the</p>

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		<p>recent 1999 Utah Wilderness Inventory of the Jack Canyon Wilderness Inventory Area, in which BLM found that the entire canyon systems and high mesas retained and did retain a natural and wilderness character despite BLM's flawed 1970's inventories. This present wilderness character determination then just vanishes as a result of a new BLM wilderness character review. This review and Supplement go on to arbitrarily exclude this natural area by justifying that the planned or future activity by oil and gas development will eventually render this area significantly impacted. This is completely the wrong approach to identifying, accounting or just acknowledging a resource, any resource, and in this particular situation, a wilderness resource. The WIA correctly included this area despite BLM's recent WCR acknowledgement that this was done in error. The route within the canyon bottom was then and continues today to be no more than a faint and nearly obliterated old route to the well locations. Further, recent flooding, well documented by BLM staff, further indicates that this feature is not a significant impact at all.</p> <p>Concerning the BLM lands north of this faint route, no physical or significant impacts have affected the area substantially or to the point that the area fails to retain a natural appearance and wilderness character. BLM errs on this wilderness character determination by accounting for the "potential" of new oil and gas activity but this activity has yet to affect the character of the landscape. This includes the character of the canyon bottom route. This is unjustified as the resource of wilderness continues to exist at the time of the Supplement.</p>	<p>Jack Canyon non-WSA land with wilderness characteristics in its 2007 wilderness characteristics maintenance based on oil and gas development. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>Labyrinth Canyon Wilderness Character Unit:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating that many of the current boundaries of the Labyrinth Canyon wilderness character unit lie along arbitrary locations that run across the natural terrain. BLM did assess the areas, but BLM contends that there is just a difference of opinion on wilderness values. To us, we know countless other situations like this one and having physically hiked in these particular areas, that if you actually stand on the placement of these currently BLM boundaries, that one side of the boundary is not drastically different from that of the other, where somehow, natural values are more intact on your right foot, rather than your left foot. With the many areas that BLM utilizes a cross country running boundary, rather than the edge of a significant impact fails to account for the full extent of lands that continue to retain a natural appearance and wilderness resource. BLM should perform a detailed inventory in each area, assess the past few seismic lines, and take into account the entire landscape and its appearance on whether it retains natural values not significantly impacted. With regards to the few seismic lines, none of these areas designated open to motorized travel in the current San Rafael Route Designation Plan, and vehicle use is absent. Vegetation regrowth has also occurred in many of the paths, with the shifting sands in the area also lessening the extent of their significance on the visual appearance of these. Overall, these few features do not detract from the overall impression that the landscape retains a natural and</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Labyrinth Canyon area, BLM performed a combination of data and on-site reviews. Portions recommended for review in public comments were included from 1999 Inventory and 2002 Revision. OHV routes were identified and considered in the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>

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		<p>wilderness character appearance.</p> <p>This oversight must be corrected and BLM must account for SUWA's previous Draft RMP comments concerning this unit's wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p>	
Wilderness	The Wilderness Society	<p>Mexican Mountain Wilderness Character Unit:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating that several areas surround the current WIA had yet to be accurately accounted for their natural and wilderness character. Unfortunately, no supplemental BLM information confirming that BLM updated this unit's wilderness character boundary as indicated has been provide to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA's previous Draft RMP comments concerning this unit's wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Mexican Mountain area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002 revision. Many of the features raised by commentors as intrusions are on the area's boundary, and therefore not within the area. OHV routes were considered, as shown on Draft RMP/EIS map 2-54. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>Mahogany Point Wilderness Character Unit:</p> <p>BLM fails to identify any of the BLM lands that comprise the Mahogany Point wilderness character unit. BLM relies strictly on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness. As a result, BLM does not account for the full range of lands retaining wilderness character. We've requested documentation of BLM's policy that guides BLM's decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II area is not justified. It's not the future management of these lands at issue it's the identification of a wilderness resource. The Wilderness Act (c)(3) states that an area meets the size definition, by having "...at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "...those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964..." Nowhere does each of these current guiding policies state</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Mahogany Point area, BLM performed a combination of data and on-site reviews. In response to some public comments, it is important to note that Forest Service "roadless areas" do not equate to "wilderness areas." The BLM will only consider areas adjacent to the Forest when the Forest Service "administratively endorses" the area as wilderness or if the area meets the size criteria.</p>

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		that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. SUWA did supply the Price BLM with supplemental and new information for the Mahogany Point wilderness character unit previously, this information remains valid and BLM will need to correctly identify the area as retaining a wilderness character for all RMP planning purposes.	
Wilderness	The Wilderness Society	<p>Muddy Creek – Crack Canyon Wilderness Character Unit:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating that many locations BLM’s inventory does not include the full extent of lands that possess and retain natural and wilderness character. Unfortunately, no supplemental BLM information confirming that BLM updated this unit’s wilderness character boundary as indicated has been provided to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA’s previous Draft RMP comments concerning this unit’s wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p>	As part of BLM’s wilderness characteristics inventory maintenance for the Muddy Creek-Crack Canyon area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002 revision. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. BLM was aware of past uranium mining activity, as evidenced by the potential Uranium Mining District ACEC, as well as uranium potential shown on Supplement map 2-64. Several of the roads specifically identified in public comments are cherry-stemmed, and therefore are not within the area. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.
Wilderness	The Wilderness Society	<p>Muddy Creek – Nelson Mountain Wilderness Character Unit:</p> <p>BLM fails to identify any of the BLM lands that comprise the Muddy Creek – Nelson Mountain wilderness character unit. BLM relies strictly on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness. As a result, BLM does not account for the full range of lands retaining wilderness character. We’ve requested documentation of BLM’s policy that guides BLM’s decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II area is not justified. It’s not the future management of these lands at issue it’s the identification of a wilderness resource. The Wilderness Act (c)(3) states that an area meets the size definition, by having “...at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition.” Further, BLM’s guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory “...those</p>	As part of BLM’s wilderness characteristics inventory maintenance for the Muddy Creek Nelson Mountain area, BLM performed a combination of data and on-site reviews. In response to some public comments, it is important to note that Forest Service “roadless areas” do not equate to “wilderness areas.” The BLM will only consider areas adjacent to the Forest when the Forest Service “administratively endorses” the area as wilderness or if the area meets the size criteria.

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		<p>roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964...” Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. SUWA did supply the Price BLM with supplemental and new information for the Mahogany Point wilderness character unit previously, this information remains valid and BLM will need to correctly identify the area as retaining a wilderness character for all RMP planning purposes.</p>	
Wilderness	The Wilderness Society	<p>Mussentuchit Badlands Wilderness Character Unit:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating an error in the unit’s eastern wilderness character boundary and the fact that the dune area retains their wilderness character despite the few occasions motorized vehicles utilizes the area.</p> <p>In addition, the dune system, while being only slightly impacted by off-road vehicle use, retains its outstanding naturalness and wilderness character. Indeed, the Mussentuchit Sand Dunes are similar to the Coral Pink Sand dunes in the Moquith Mountain WSA, managed by the Kanab FO. Even though ORVs are impacting the Coral Pink dune system greater than that of these dunes, the BLM continues to regard the Coral Pink Sand Dunes as retaining wilderness character, although there can be little disagreement that ORV use in the dunes are impacting the vegetation, wildlife, and riparian areas. BLM should likewise acknowledge that the Mussentuchit Sand Dunes have wilderness character.</p> <p>Unfortunately, no supplemental BLM information confirming that BLM updated this unit’s wilderness character boundary as indicated has been provide to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA’s previous Draft RMP comments concerning this unit’s wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Mussentuchit area, BLM performed a combination of data and on-site reviews. The 1999 wilderness characteristics inventory and the 2002 revisions discuss the sand dunes on the east of the area. Two roads are cherry-stemmed, and therefore are not within the area. BLM considered OHV routes by incorporating the inventory from the 2003 San Rafael Route Designation Plan. Clay potential is recognized, as shown on Supplement map 2-65. The BLM also recognizes that the eastern boundary is bisected by a County road from the western boundary of Cedar Mountain WC area. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>Price River Wilderness Character Unit:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating that many locations BLM’s inventory does not include the full extent of lands that posses and retain natural and wilderness character. Unfortunately, no supplemental BLM</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Price River area, BLM performed a combination of data and on-site reviews. The 2002 wilderness characteristics review included data on OHV</p>

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		<p>information confirming that BLM updated this unit’s wilderness character boundary as indicated has been provide to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA’s previous Draft RMP comments concerning this unit’s wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p> <p>Further, BLM’s assessment of the recently maintained TV Tower route constitutes an impact of the wilderness resource of the area. BLM stated, “[t]her maintenance of the trail is enough of an impact to form a boundary that separates the portions.” Interesting because BLM claimed the maintenance of the route, without any NEPA documentation performed, was done “...because the route...was deteriorating with the resulting danger to the resource values in the area.” Mr. Bankert letter received by SUWA March 14, 2007. Again it’s well known that the route was not passable by vehicles, except a few motorcycles perhaps, and did not constitute a significant impact on the naturalness of the area until after the illegal reconstruction of the naturally rehabbed route. For the record, BLM had information on the areas wilderness resource prior to any maintenance, and the resulting construction significantly impacted the areas wilderness resource, in affect eliminating it without any public involvement or NEPA.</p>	<p>routes (see also Draft RMP/EIS map 2-54). The 2007 wilderness characteristics inventory already reviewed additional acreage recommended by public comments. Oil and gas potential was considered as shown on Supplement map 3-23. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>San Rafael Reef Wilderness Character Unit:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating that many locations BLM’s inventory does not include the full extent of lands that posses and retain natural and wilderness character. Unfortunately, no supplemental BLM information confirming that BLM updated this unit’s wilderness character boundary as indicated has been provide to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA’s previous Draft RMP comments concerning this unit’s wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the San Rafael Reef area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002 revision. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>Sids Mountain Wilderness Character Unit:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating that many locations BLM’s inventory does not include the full extent of lands that posses and retain natural and wilderness character. Unfortunately, no supplemental BLM information confirming that BLM updated this unit’s wilderness character boundary as indicated has</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Sid’s Mountain area, BLM performed a combination of data and on-site reviews. In association with public comments on the 1999 inventory, additional areas were added in the 2002</p>

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		<p>been provide to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA’s previous Draft RMP comments concerning this unit’s wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p>	<p>revision near the “wedge”. The 2007 review took OHV routes into consideration by incorporating the inventory from the 2003 San Rafael Route Designation Plan. Gypsum potential is recognized, as shown on Supplement map 2-64. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>South Horn Mountain Wilderness Character Unit:</p> <p>BLM fails to identify larger portions of the BLM lands that comprise the South Horn Mountain wilderness character unit. BLM’s Unit B was correctly determined to retain a wilderness character, but this is only due to the stand-alone acreage of the area itself. Then, BLM relies strictly on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness. As a result, BLM does not account for the full range of lands retaining wilderness character. We’ve requested documentation of BLM’s policy that guides BLM’s decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II area is not justified. It’s not the future management of these lands at issue it’s the identification of a wilderness resource. The Wilderness Act (c)(3) states that an area meets the size definition, by having “...at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition.” Further, BLM’s guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory “...those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964...” Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. SUWA did supply the Price BLM with supplemental and new information for the Mahogany Point wilderness character unit previously, this information remains valid and BLM will need to correctly identify the area as retaining a wilderness character for all RMP planning purposes.</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the South Horn Mountain area, BLM performed a combination of data and on-site reviews. In response to some public comments, it is important to note that Forest Service “roadless areas” do not equate to “wilderness areas.” The BLM will only consider areas adjacent to the Forest when the Forest Service “administratively endorses” the area as wilderness or if the area meets the size criteria. The 2007 wilderness characteristics inventory considered the Rock Canyon Road, which bisects the area. No new information was submitted that has not already been considered in BLM’s wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>Trail Mountain Wilderness Character Unit:</p> <p>BLM fails to identify any of the BLM lands that comprise the Muddy Creek – Nelson Mountain wilderness character unit. BLM relies strictly on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness. As a result, BLM does not account for the full range of lands retaining wilderness character. We’ve requested documentation of BLM’s policy that guides BLM’s decisions in these situations, but Utah State Office</p>	<p>As part of BLM’s wilderness characteristics inventory maintenance for the Trail Mountain area, BLM performed a combination of data and on-site reviews. In response to some public comments, it is important to note that Forest Service “roadless areas” do not equate to “wilderness areas.” The BLM will</p>

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		<p>personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II area is not justified. It's not the future management of these lands at issue it's the identification of a wilderness resource. The Wilderness Act (c)(3) states that an area meets the size definition, by having "...at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "...those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964..." Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. SUWA did supply the Price BLM with supplemental and new information for the Mahogany Point wilderness character unit previously, this information remains valid and BLM will need to correctly identify the area as retaining a wilderness character for all RMP planning purposes.</p>	<p>only consider areas adjacent to the Forest when the Forest Service "administratively endorses" the area as wilderness or if the area meets the size criteria.</p>
Wilderness	The Wilderness Society	<p>Upper Muddy Creek Wilderness Character Unit:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating that a few locations BLM's inventory does not include the full extent of lands that possess and retain natural and wilderness character. Unfortunately, no supplemental BLM information confirming that BLM updated this unit's wilderness character boundary as indicated has been provided to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA's previous Draft RMP comments concerning this unit's wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Upper Muddy Creek area, BLM performed a combination of data and on-site reviews. The 1999 inventory was updated in 2002, although additional areas proposed by some commentors were not found to have wilderness characteristics and were not added. During the 2002 maintenance, the BLM identified the several routes that some commentors identified. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>
Wilderness	The Wilderness Society	<p>Wild Horse Mesa Wilderness Character Unit:</p> <p>SUWA provided the BLM with supplemental and new specific information during the Draft RMP comment period indicating that a few locations BLM's inventory does not include the full extent of lands that possess and retain natural and wilderness character. Unfortunately, no supplemental BLM information confirming that BLM updated this unit's wilderness character boundary as indicated has been provided to the public in the publication of the Price Supplemental RMP. This oversight must be corrected and BLM must account for SUWA's previous Draft RMP comments concerning this unit's wilderness character and changes that warranted and should have been adjusted. This previously provided new wilderness character information must be addressed prior to the final RMP, failure to do so constitutes incomplete documentation of this BLM resource.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Wild Horse Mesa area, BLM performed a combination of data and on-site reviews. In the 2002 update of the 1999 inventory, additional areas were added. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p>

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Wilderness	The Wilderness Society	<p>Wildcat Knolls Wilderness Character Unit:</p> <p>BLM fails to identify the entire extent of the BLM lands that comprise the Wildcat Knolls wilderness character unit. BLM correctly determined that a small portion of the lands managed by the Price FO retain a wilderness character, but this is only due to the stand-alone acreage of the area itself and within the Richfield FO. Then, BLM relies strictly on the Forest Service to be managing their portion of this roadless and wilderness character unit as Wilderness or as endorsed wilderness. Some of the As a result, BLM does not account for the full range of lands retaining wilderness character. We've requested documentation of BLM's policy that guides BLM's decisions in these situations, but Utah State Office personal stated that there is no specific BLM policy. Therefore, the exclusion of this natural area, adjoining and contiguous with the larger Forest Service Rare II area is not justified. It's not the future management of these lands at issue it's the identification of a wilderness resource. The Wilderness Act (c)(3) states that an area meets the size definition, by having "...at least five thousand acres of land or is sufficient size to make practicable its preservation and use in an unimpaired condition." Further, BLM's guidance of the Federal Lands Policy and Management Act (FLMPA) directed the BLM to inventory its landscape for wilderness character. Section 603(c) to inventory "...those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964..." Nowhere does each of these current guiding policies state that a political boundary separates federal agency lands or that one agency must have made a formal recommendation for wilderness designation. SUWA did supply the Price BLM with supplemental and new information for the Mahogany Point wilderness character unit previously, this information remains valid and BLM will need to correctly identify the area as retaining a wilderness character for all RMP planning purposes.</p>	<p>As part of BLM's wilderness characteristics inventory maintenance for the Wildcat Knolls Extension area, BLM performed a combination of data and on-site reviews. In response to some public comments, it is important to note that Forest Service "roadless areas" do not equate to "wilderness areas." The BLM will only consider areas adjacent to the Forest when the Forest Service "administratively endorses" the area as wilderness or if the area meets the size criteria. A small piece in the Price Field Office was considered in the 2007 wilderness characteristics inventory maintenance, the remainder was considered by the Richfield Field Office.</p>
Wilderness	The Wilderness Society	<p>The Supplement identifies acreage of inventoried lands with wilderness characteristics that the BLM has determined to lack wilderness characteristics, totaling 143,120 acres. Supplement, Table 3-19. However, the Supplement includes only the briefest overview of the inventory having occurred and then presents conclusions. See, Supplement, pp. 3-2 – 3-3. There is no explanation of the findings, such as how they were made or why these 143,120 acres were not suitable. There is not even a discussion of how the acreage of non-WSA lands with wilderness characteristics decreased from 955,000 acres in the Draft RMP to 937,440 acres in the Supplement. Although there is a reference to supporting documentation being available for review at the Price Field Office, this does not fulfill the agency's obligations to provide this data – especially without any further discussion or posting this information on the RMP website.</p>	<p>In the Draft RMP/EIS there were several discrepancies in acres due to clerical and GIS errors. The BLM has fixed these discrepancies in the Proposed RMP/Final EIS.</p> <p>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-</p>

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			<p>2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process (findings from this review are available 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 1,094,030 acres of lands for the existence of wilderness characteristics, including all lands within the Red Rock Wilderness Act. The BLM found that 937,440 acres of these lands contained wilderness characteristics and are proposed for protective management in Alternative E. The remaining 156,590 acres did not have wilderness characteristics based on the inventory maintenance conducted by the BLM between 1996 and 2007. These findings are available by request in the administrative record.</p>
Wilderness	The Wilderness Society	<p>In order to ensure ongoing protection of the wilderness characteristics in the WSAs, the Price RMP should provide for the WSAs to be managed to protect wilderness characteristics in the event that all or part of any WSA is released by Congress.</p>	<p>The management of WSAs if released by Congress under Alternative E is consistent with the management philosophy of Alternative E, which is to protect areas with wilderness characteristics. The Draft RMP/EIS, as modified by the wilderness characteristics supplement, provides the decisionmaker a range of alternatives from which to develop the Proposed RMP and eventually the Final RMP/ROD.</p>
Wildlife and Fish	National Rifle Association	<p>Most of these concerns relate to the lands referred to as "Non-WSA with Wilderness Characteristics" under Alternative E. It is our understanding that, for all intents and purposes, these lands will be managed as wilderness. If this occurs, there will be dramatic impact on the hunters and wildlife using these lands. It is the NRA's contention that the SEIS does not adequately disclose impacts on hunters and wildlife.</p> <p>There are popular trail systems that weave throughout these lands considered to have wilderness</p>	<p>The wilderness characteristics supplement to the Draft RMP/EIS does note the impacts to OHV use from Alternative E, which includes closing miles of routes in non-WSA lands with wilderness characteristics. User data on who uses these routes is not available, and the commentor did not provide any additional</p>

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		<p>characteristics pursuant to Alternative E. Countless hunters use off-highway vehicles (OHVs) on these trails in order to access their hunting grounds and retrieve game animals they have harvested. If adopted, Alternative E would end this access and means of game retrieval. Maintaining reasonable hunter access to public lands is an issue of enormous interest to NRA because it plays a critical role in ensuring the recruitment and retention of hunters. Because hunters are America’s leading contributors to wildlife conservation, hunter recruitment and retention is essential to the preservation of wildlife. Federal and state wildlife management authorities will be prevented from conducting common game management practices such as providing supplemental water during droughts and using vehicles and aircraft to survey populations and recover dead animals in a timely manner in order to diagnose and treat disease.</p>	<p>data to support their claims that hunting would decrease. Administrative access for wildlife management may be granted on a case-by case basis through close coordination between the BLM and wildlife management agencies.</p>
Wildlife and Fish	Public Lands Policy Coordination	<p>The state believes the BLM should only employ the term “critical habitat” when referring to the legal habitat designations for endangered and threatened species under the Endangered Species Act. The state requests that the BLM use the “crucial habitat” designations mapped by the Division of Wildlife Resources solely as descriptive wildlife habitat designations.</p>	<p>The Proposed RMP/Final EIS has been modified to use the terms crucial and critical as described by the commentor. The habitat information provided by the Utah Division of Wildlife Resources has not been used as a blanket exclusion zone, but has been used to develop management prescriptions to address issues raised during scoping and subsequent coordination between the BLM and the Utah Division of Wildlife Resources.</p>
Wildlife and Fish	Public Lands Policy Coordination	<p>The state is disappointed that the BLM is dropping the requirement for mitigation when significant acreages of important wildlife habitat are developed for energy resource extraction (p. 2-7). The phrase “encourage willing partners to participate in off-site mitigation strategies” is vague and does not convey the importance of wildlife resources and wildlife habitat within BLM public lands. At the very least, the decision to keep or drop the mitigation requirement should be evaluated in the alternatives.</p>	<p>The No Action Alternative retains requirements for and analysis of off-site mitigation. The action alternatives do not preclude implementation of off-site mitigation, but provide for flexibility in developing mitigation strategies to address site-specific conditions.</p>
Wildlife and Fish	Public Lands Policy Coordination	<p>We recommend that mineral material activities affecting sage-grouse, mule deer, and elk habitat have seasonal restrictions and required mitigation for habitat loss.</p>	<p>Mineral materials development is a discretionary BLM action. As such, the BLM can identify additional stipulations prior to development without completing a land use plan amendment. Stipulations on individual mineral material projects can be applied to site-specific operations depending on the on-the-ground conditions at the time of development.</p>
Wildlife and Fish	The Wilderness Society	<p>In discussing the impacts of protecting non-WSA lands with wilderness characteristics on fish and wildlife, the Supplement contains a very brief discussion noting improved habitat for Rocky Mountain bighorn sheep, desert bighorn sheep, elk, mule deer and pronghorn habitat. Supplement, p. 4-28. However, there is no thorough discussion of habitat fragmentation in terms of the benefits to wildlife</p>	<p>A thorough analysis of habitat fragmentation benefits would require more information than is known at this landscape-level planning document, such as where new roads,</p>

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		<p>from reducing habitat fragmentation caused by oil and gas development and ORVs.</p> <p>Roads and ORV routes are now widely recognized in the scientific community as having a range of direct, indirect and cumulative effects on habitats and wildlife (Trombulak and Frissell 2000). Effects range from direct removal of habitat to long-term displacement of species from preferred habitat. The indirect and cumulative effects are hardest to measure, but are increasingly studied through analysis of habitat fragmentation.</p> <p>As documented by the comprehensive literature reviews cited above, the existence of motorized routes can result in habitat fragmentation and, depending on the use of the route, have impacts extending well into surrounding habitats. Such fragmentation from transportation networks is immediate and can lead to a range of risks to the survival of wildlife. Sound science and spatial analysis must be used to evaluate impacts from any network of travel routes before its adoption through a planning process.</p>	<p>pipelines and wellpads will be placed on the landscape in relationship to species' crucial habitats. The impact analysis has been clarified to note that mineral development, notably oil and gas development, and OHV use along routes could displace wildlife species and introduce disturbance during sensitive periods. The magnitude of this impact would vary based on the prescriptions in each alternative. The impacts identified by the commentor are addressed in Chapter 4 of the Proposed RMP/Final EIS.</p>
Wildlife and Fish	Theodore Roosevelt Conservation Partners	The Price 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 and their habitats.	<p>Appendices 8 and 16 from the Draft RMP/EIS include stipulations for oil and gas development in fish and wildlife habitat. These two appendices have been condensed into Appendix G in the Proposed RMP/Final EIS. Also, please see sections 4.2.8 for a discussion of the impacts to fish and wildlife from mineral decisions and subsequent exploration and development. As leases are proposed, site-specific NEPA analysis, including impacts to fish and wildlife habitat, will be conducted.</p>
Wildlife and Fish	Theodore Roosevelt Conservation Partners	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.	Funding is approved at the Congressional level and is outside the authority of the RMP. Oil and gas leasees are held to terms and conditions of the lease, which may include financial responsibility for wildlife monitoring and mitigation.
Wildlife and Fish	Theodore Roosevelt Conservation Partners	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 those leases should be done with careful consideration of wildlife management objectives set by the UT DWR.	The Draft RMP/EIS includes management actions under Fish and Wildlife Common to All Alternatives (page 2-13 of the Draft RMP/EIS) that support UDWR management

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			plans and objectives. The Proposed RMP/Final EIS has been modified to note that specific conservation actions are specified in UDWR management plans, such as the Utah Comprehensive Wildlife Conservation Strategy. Impacts to wildlife habitat from oil and gas leasing management actions are discussed generally in Section 4.2.8 in the Proposed RMP/Final EIS. As leases are proposed, site-specific NEPA analysis, including impacts to fish and wildlife habitat, will be conducted.
Wildlife and Fish	Theodore Roosevelt Conservation Partners	The Price DEIS as a whole 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 trout.	When analyzing the effects of proposed land management actions on resources, BLM staff used a variety of information sources including peer-reviewed literature, government and non-government organizations research and reports, field office inventory and monitoring data, and field observations. There is a great amount of data available that presents the best scientific information concerning the impacts of oil and gas development on wildlife. Additionally, Appendices 8 and 16 from the Draft RMP/EIS include stipulations for oil and gas development in fish and wildlife habitat. These two appendices have been condensed into Appendix G in the Proposed RMP/Final EIS. Also, please see sections 4.2.8 for a discussion of the impacts to fish and wildlife from mineral decisions and subsequent exploration and development. As leases are proposed, site-specific NEPA analysis, including impacts to fish and wildlife habitat, will be conducted.
Wildlife and Fish	Theodore Roosevelt Conservation Partners	The Price field office should consider geographically-phased energy development prior to the leasing stage to responsibly balance the needs of fish and wildlife with natural gas extraction. Large geographic areas to be offered for oil and gas leasing first should be subdivided into smaller parcels to be leased.	The BLM's land use planning handbook provides direction for RMP-level decisions in relation to oil and gas leasing, which includes identifying areas available for leasing and any required stipulation. The identification of

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			areas to be offered in a specific lease and the pattern of leasing is not an RMP-level decision and is therefore outside the scope of this EIS.
Wildlife and Fish	Theodore Roosevelt Conservation Partners	Given the nature of leasing and the need for upfront comprehensive planning, it needs to be known during the RMP process how the Price field office 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.	The BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. As described in Appendix G of the Proposed RMP/Final EIS, timing limitation stipulations on oil and gas leasing could protect wildlife values. At the implementation phase, when the location and scope of a given exploration or development project are known, the Price Field Office will establish plans for mitigation, including fish and wildlife monitoring and the use of adaptive management strategies to prevent or mitigate impacts of oil and/or gas exploration and development. These will be completed during the NEPA compliance on the projects at that time.

Individuals' Comments and Responses

Category	First Name	Last Name	Comment	Response
ACEC	Tyler	Kokjohn	Page 2-27 Allowing disposal at ACEC sites like Temple-Cottonwood Dugout wash and Nine Mile Canyon seems out of character with the idea of preserving such places.	Disposal of mineral materials is a discretionary action that needs to go through additional planning prior to authorization. The relevant and important values associated with each of these ACECs are not of the nature that a mineral material pit would guarantee irreparable damage. Therefore, closure to mineral materials is not required to protect the relevant and important values. Restrictions would be placed on any potential developments in these areas that would ensure protection of the relevant and important values.
Cultural Resources	Tyler	Kokjohn	4.3.4 Cultural Resources (page 4-12) – paragraph starting “Requiring inventories” – With all due	The BLM's policy is to fully protect cultural

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Category	First Name	Last Name	Comment	Response
			<p>respect, there must be a better strategy to collect information about these places other than to discover it immediately before you allow these sites to be destroyed on a piecemeal basis as development proceeds. Far better would be a plan that works proactively to recognize places in which development should be re-routed, paced very carefully, or not allowed at all well before a project is underway. The way this reads it is not hard to envision surveyors working a few paces in front of a bulldozer.</p> <p>For an example of a better strategy, I urge the planners to look at how they propose to manage paleontological resources in this same alternative in which the preferred method is avoidance and mitigation measures include project relocation, redesign and, if needed, curation and scientific examination before loss of the resource.</p>	<p>resources. Protection is accomplished largely through avoiding disturbing sites, which is the BLM's preferred method of mitigation. The impacts to cultural resources from inventories and potential mitigation have been further clarified in the Proposed RMP/Final EIS. Additionally, proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the Price Field Office. The Draft RMP/EIS on page 2-38 identifies areas where cultural resource inventory areas are prioritized, and would be conducted under Section 110.</p>
General Comments	Shandon	Erickson	<p>While the SDEIS states valid existing lease rights would be honored, it fails to discuss how the agency would ensure access to the 36,000 acres of lands currently under lease but included in lands slated for withdrawal from leasing. Access to these leases would be needed in order for them to be developed despite the fact the surrounding lands would be closed to leasing and development. BLM needs to specify how it would manage these lands with respect to valid existing rights.</p>	<p>Please see general comment response # 6</p>
General Comments	Kurt	Reisser	<p>While the SDEIS states valid existing lease rights would be honored, it fails to discuss how the agency would ensure access to the 36,000 acres of lands currently under lease but included in lands slated for withdrawal from leasing. Access to these leases would be needed in order for them to be developed despite the fact the surrounding lands would be closed to leasing and development. The BLM needs to specify how it would manage these lands with respect to valid existing rights.</p>	<p>Please see general comment response # 6</p>
General Comments	Craig	Royce	<p>For such a fine document there appears to be a dearth of mention of grandfathered rights, valid existing rights, and "cherry stemmed right of ways." Could this result in a run of ILBA hearings and local and federal court challenges?</p>	<p>Please see general comment response # 6</p>
Lands and Realty	Laura	Lindley	<p>Supplemental DEIS fails to comply with Sections 202 and 204 of FLPMA by failing to disclose the withdrawal of more than 5,000 acres from oil and gas leasing and the management decision to exclude a principal or major use (i.e., mineral exploration and production) from more than 100,000 acres.</p>	<p>Please see general comment response # 4</p>
Minerals and Energy Resources	Denise	Dragoo	<p>Operations and production on these leases are suspended until all state and federal actions regarding the Project are resolved, including all administrative and judicial appeals. UEI has also submitted to BLM a lease by application ("LBA") for an additional 4,100 acres of coal reserves in the Williams Draw area to extend the life of the Project. UEI is concerned that proposed Alternative E would exclude from future leasing non-WSA lands within the Project and the adjacent Williams Draw LBA. See Map 2-70, Coal Available for Further Consideration for Leasing Alternative E; Supplemental EIS, at 2-22.</p>	<p>Management prescriptions for non-WSA lands with wilderness characteristics under Alternative E and the Proposed RMP would not preclude coal leasing. However, there would be stipulations on surface facilities associated with the development of coal resources.</p>

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Category	First Name	Last Name	Comment	Response
Minerals and Energy Resources	Shandon	Erickson	Of additional concern is that the reasonably foreseeable development scenario prepared for the Price RMP revision in 2003 was found inaccurate by industry because it relied on outdated information and didn't consider the improved economic climate for the exploration for and development of natural gas along with the increased activity taking place in the FO area. It was recommended that BLM utilize a broader spectrum of current geologic data available from the energy industry to upgrade the RFD scenario. Since the RFD was not revised in conjunction with the SDEIS, the potential impacts of implementation of Alternative E and the other alternatives would be radically greater than projected by BLM. We recommend BLM reanalyze the effects of the Alternative E as well as the alternatives contained in the previously released Price Draft EIS/RMP by utilizing updated geologic data and recognizing increased exploration and development activities in the area.	Please see general comment response # 9
Minerals and Energy Resources	Shandon	Erickson	BLM has ignored the findings of EPCA Phase II which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10
Minerals and Energy Resources	Dan	Naatz	Of additional concern is that the reasonably foreseeable development scenario prepared for the Price RMP revision in 2003 was found inaccurate by industry because it relied on outdated information and didn't consider the improved economic climate for the exploration for and development of natural gas along with the increased activity taking place in the area. We recommend BLM reanalyze the effects of the Alternative E as well as the alternatives contained in the previously released Price Draft EIS/RMP by utilizing updated geologic data and recognizing increased exploration and development activities in the area.	Please see general comment response # 9
Minerals and Energy Resources	Dan	Naatz	BLM has ignored the findings of EPCA Phase II which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10
Minerals and Energy Resources	Kurt	Reisser	Of additional concern is that the reasonably foreseeable development scenario prepared for the Price RMP revision in 2003 was found inaccurate by industry because it relied on outdated information and didn't consider the improved economic climate for the exploration for and development of natural gas along with the increased activity taking place in the Field Office area. It was recommended that the BLM utilize a broader spectrum of current geologic data available from the energy industry to upgrade the RFD scenario. Since the RFD was not revised in conjunction with the SDEIS, the potential impacts of implementation of Alternative E and the other alternatives would be radically greater than projected by BLM. We recommend that the BLM reanalyze the effects of the Alternative E as well as the alternatives contained in the previously released Price Draft EIS/RMP by utilizing updated geologic data and recognizing increased exploration and development activities in the area.	Please see general comment response # 9
Minerals and Energy Resources	Kurt	Reisser	The BLM has ignored the findings of EPCA Phase II which evaluated and analyzed the impacts of drilling permit conditions of approval in addition to lease stipulations, as required by Section 364 of the Energy Policy Act of 2005.	Please see general comment response # 10

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Category	First Name	Last Name	Comment	Response
OHV Route Identification	John	Bores	The Chimney Rock area has many trails that have traditionally been used for OHV races. These trails need to be identified in the DRMP alternatives and designated for OHV use in the final RMP.	Please see general comment response # 16
OHV Route Identification	Steve	Chapel	Motorized recreation should be allowed on all roads currently in existence. If a road is closed a new route should be built to compensate users.	There is no legal, regulatory, or policy requirement for the BLM to maintain the current number of miles of routes available to motorized recreationists. The Draft RMP/EIS and its supplements provides the decisionmaker a range of alternatives from which to develop the Proposed RMP and eventually the Final RMP/ROD.
OHV Route Identification	Evan	Day	In comparing OHV Area Designations on maps 2-13, 2-14, 2-15 and 2-16 (Options A, B, C, & D), I am concerned that all the area south of Interstate-70 is shown as limited to Designated Routes only. However, on the OHV Route Designation maps 2-54, 2-55, and 2-56 (again Options A/B, C, & D), no routes are actually shown --- which leads me to believe that the intent is to close off any access. My wife and I are in our 70's, and she in particular is unable to walk more than a very short distance from our truck to collect agate, petrified wood, onyx, minerals, etc to make into jewelry in our "Rockhounding" hobby. And as Dr. Jim Kirkland, Utah State Paleontologist, will certainly agree, it is knowledgeable amateur paleontologists like myself that bring to his attention most of the new fossil finds in Utah. Please include in your final RMP access possibilities for personal, non-commercial rock and fossil collecting.	Routes identified in the San Rafael Route Designation Plan (2003) were incorporated by reference in Chapter 2 of the Draft RMP/EIS, but they were inadvertently left off the maps in the Draft RMP/EIS. These routes were added to the maps in the Proposed RMP/Final EIS.
OHV Route Identification	Robert	Enriquez	The Purple Trail is especially important as a valuable recreational and conservation asset as it provide a loop for a system of trails, thereby reducing the number of "in and out" trips over the same trails.	The Purple Trail is closed under Alternative E to align with managing the area for its wilderness characteristics. In other alternatives, this trail is left open. This ensures the Draft RMP/EIS provides the decisionmaker a range of alternatives from which to develop the Proposed RMP and eventually the Final RMP/ROD.
OHV Route Identification		Form Letter	The Chimney Rock Motorcycle Trail System has been permitted by the BLM for off road competition events for over 25 years. This is long established trail system and must to be recognized and DESIGNATED. I support the designation of the Chimney Rock Trail System that was submitted by the Sage Riders Motorcycle Club.	Please see general comment response # 16
OHV Route Identification		Form Letter	The Chimney Rock Motorcycle Trail System has been permitted by the BLM for off road competition events for over 25 years. This is long established trail system and must to be recognized and DESIGNATED. I support the designation of the Chimney Rock Trail System that was submitted by the Sage Riders Motorcycle Club.	Please see general comment response # 16
OHV Route Identification		Form Letter	The Chimney Rock Motorcycle Trail needs to be recognized and officially designated. This trail system has been in use for 25 years and has been permitted by the BLM. We have used it for	Please see general comment response # 16

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Category	First Name	Last Name	Comment	Response
			competition, recreation and other events for at least that long. I support the Sage Riders Club and their interpretation of the Chimney Rock Trail System.	
OHV Route Identification	David	McIntire	Any significant reduction of routes will only serve to concentrate users in other areas, which will degrade the entire experience for all (more crowded) and perhaps lead to overuse of the 'approved' areas.	The Wilderness Characteristics Supplement to the Draft RMP/EIS (Sections 4.3.11 and 4.3.14) acknowledges the impacts to motorized recreation opportunities from closing routes, as well as the associated impacts to other resources.
OHV Route Identification	Christopher	Olsen	The Chimney Rock Motorcycle Trail System needs to be recognized and DESIGNATED. This trail system has been permitted by the BLM for off road competition events for over 25 years. I strongly support the designation of the Chimney Rock Trail System that was submitted by the Sage Riders Motorcycle Club. The VJ Trail and Cottonwood Wash Trails should also be re-opened to motorized use.	The routes in the Chimney Rock area are closed under Alternative E to align with managing the area for its wilderness characteristics. In other alternatives, these trails are left open. This ensures the Draft RMP/EIS provides the decisionmaker a range of alternatives from which to develop the Proposed RMP and eventually the Final RMP/ROD. Modification of the San Rafael Route Designation Plan is not being considered as part of this planning process.
OHV Route Identification	Chris	Orndorff	Before the Sage Riders, the Pathfinders motorcycle club put on races in the area in the early 1980s and perhaps even earlier. over 100 miles of these trails were archaeologically surveyed, submitted to BLM and approved for use in off-road motorcycle races. While there aren't many races held in the area anymore, the trails still receive use and very much enjoyed by us off-road types. These trails that I speak of include the Dry Mesa, Chimney Rock, Neversweat Wash, Summerville Washes, Humbug Wash, The Door, Lost Springs, and other adjacent areas I don't know the proper names of. These trails, having already been identified, surveyed, and put into use need to be permanently recognized and designated by the BLM as approved OHV routes.	Please see general comment response # 16
OHV Route Identification	Carlo	Sanchez	The Never Sweat and Lost Springs proposed WCs contain the Chimney Rock Motorcycle Trail System that needs to be recognized and DESIGNATED. This trail system has been permitted by the BLM for off road competition events for over 25 years.	Please see general comment response # 16
OHV Route Identification	Robert	Telepak	The Chimney Rock Motorcycle Trail System is a special case. It has historically been used for BLM-permitted competition events for over 25 years. This trail system needs to be formally recognized by the Price BLM and designated for motorized use.	Please see general comment response # 16
Process and Procedures	Charles	Bagley	Your preferred alternative should specify that at least 2 of your Non-Wilderness Lands with Wilderness Characteristics (WC's) should be managed to preserve their wilderness character. The first area is Wild Horse Mesa with the small, contiguous WC areas between it and the WSA to the north. The second is the WC immediately west (not named on your map), which lies on the west bank of Muddy Creek, and has the Richfield area as its south boundary.	The Price Field Office has developed specific criteria for determining which of non-WSA lands with wilderness characteristics should be managed for those values in the Proposed RMP. This criteria was used in the selection of

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Category	First Name	Last Name	Comment	Response
			<p>The Richfield RMP DEIS has also identified these 2 areas as WC's in their region. Under the names of Wild Horse Mesa, and Muddy Creek-Crack Canyon (for the western one) RFO also recognizes their Wilderness Character. In the RFO preferred Alternative B they are planning to close some OHV routes in these areas, and eliminate all cross-country travel there. (Now it is all open the X-C travel. See maps 2-18, 2-12 and 2-14.)</p> <p>As the PFO/ RFO border arbitrarily splits these fine WC areas, it is only proper to have both RMP's fit together, and both offices share the same plan for their WC protection.</p>	those non-WSA lands with wilderness characteristics contained in the Proposed RMP in Chapter 2 of the Proposed RMP/Final EIS.
Process and Procedures	Shandon	Erickson	While BLM was required to review the wilderness values of non-wilderness lands, the court did not require BLM to develop an alternative that would essentially eliminate all multiple uses of public lands in the Price FO.	Please see general comment response # 7
Process and Procedures		Form Letter	The BLM should detail how public lands proposed for leasing and development will be managed for a balance of uses including hunting and fishing, as required their multiple-use mandate in the Federal Land Policy and Management Act.	The BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. As described in Appendix G of the Proposed RMP/Final EIS, timing limitation stipulations on oil and gas leasing could protect wildlife values. BLM coordinates with the Utah Division of Wildlife Resources (UDWR) in the management of wildlife habitat to help ensure that UDWR management goals are being addressed. This coordination includes determination of the appropriate big game herd numbers to ensure that range conditions meet the Standards for Rangeland Health and forage production for livestock is not decreased.
Process and Procedures	Laura	Lindley	I recognize the need for BLM to analyze the impact of oil and gas leasing on so-called wilderness characteristics as a result of the Kimball decision, but nothing in the Kimball decision requires BLM to make the unwise decision to eliminate highly prospective lands from oil and gas leasing and development.	Please see general comment response # 7
Process and Procedures	Craig	Royce	The myriad acronyms utilized are functional yet prove confusing, almost overwhelming, to the lay reader. Perhaps a terse glossary of acronyms is in order.	While the supplement did not include a Glossary of Term or List of Acronyms, the Draft RMP/EIS included each, as does the Proposed

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Category	First Name	Last Name	Comment	Response
				RMP/Final EIS.
Recreation		Form Letter	Given the long-term nature of energy development, the BLM should include its plan for compensating hunters for the loss of big game that might occur as a result of development. Specific areas of concern include the Central Mountains and Nine Mile limited elk hunting units, crucial mule deer habitat along the Book Cliffs and the Price River blue-ribbon trout fishery.	BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. Compensating hunters is outside the scope of this EIS. However, as described in Appendix G of the Proposed RMP/Final EIS timing limitation stipulations on oil and gas leasing would help protect hunting values.
Recreation	Tyler	Kokjohn	Page 2-17 NMC SRMA information – Opening to oil and gas leasing does not seem compatible with resources conservation and seems frankly out of place for the most protective of the considered alternatives. In effect, this puts the question as ‘how many wells do we want?’ instead of considering the evidence that for some areas like NMC the best option may be no wells at all.	Under Alternative E, the Nine Mile Canyon SRMA would be open to leasing, but with no surface occupancy constraints on all leases. The land ownership pattern in the bottom of the canyon has resulted in the development of several wells on private or state land adjacent to BLM administered lands. A no surface occupancy stipulation would protect surface resources but still allow wells developed on adjacent lands to access the mineral resources through directional drilling. No wells in Nine Mile Canyon is not an option given the land ownership pattern and presence of existing leases.
Socioeconomics	Rob	Bishop	If adopted, Alternative E would severely restrict economic viability of Emery and Carbon counties by eliminating any productive uses-oil and gas development, mining, logging, ranching and motorized recreation-from 60 of the public lands in the planning area. Alternative E would harm Utah's rural economy and increase our nation's reliance on foreign energy sources.	Please see general comment response # 1
Socioeconomics	Rob	Bishop	In Alternative E, the BLM has failed to adequately provide reasonable access to minerals and to consider the effects its proposed management strategy will have on the rural economy.	Please see general comment response # 1
Socioeconomics	Denise	Dragoo	UEI also disagrees with BLM's conclusion that the impacts to employment from the proposed coal leasing restrictions "is small." Supplemental EIS, pp. 4-64. The employment impacts are not "small" with respect to the Lila Canyon Mine Project. Some 220 jobs will be impacted by shortening the life of the Project under Alternative E. UEI requests that the RMP/EIS be amended to recognize the loss of these jobs as an economic impact of adopting Alternative E. BLM has appropriately recognized the impacts to income from shortening the Lila Canyon Mine life due to removal of non-WSA lands from the federal coal reserve base. Supplemental EIS at pp. 4-65.	Please see general comment response # 1
Socioeconomics	Shandon	Erickson	BLM has drastically exceeded what could be construed as reasonable management in the development of Alternative E, which would withhold 1.5 million acres, more than 60 percent of the	Please see general comment response # 1

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			study area, from oil and gas leasing and other activities while imposing no surface occupancy on another 130,000 acres. Adoption or incorporation of Alternative E into the Preferred Alternative of the Price Draft EIS/RMP would have a crippling impact on oil and gas exploration and development and other multiple uses in the Price Field Office, which would in turn have a severely negative impact on local, state, and federal economies.	
Socioeconomics	Shandon	Erickson	The socio-economic analysis contained in the SDEIS grossly underestimates the impacts of Alternative E regarding the loss of jobs related to the energy industry. According to a study prepared by the University of Utah's Bureau of Economic and Business Research, the energy industry accounts for 49.5 percent of the employment and 60 percent of the total wages in Uintah and Duchesne Counties. BLM's claim that "decreased gas development would lower future potential employment in the area by about 90 part-time and full-time jobs per year as compared to the No Action Alternative" is unquestionably inaccurate. The analysis must re-evaluate the negative impacts associated with lost revenue to the local, state and federal treasuries. Additionally, the SDEIS must analyze the increased costs associated with development of existing leases in conjunction with the severe restrictions contained in Alternative E. These flaws must be rectified and fully considered before the FEIS is released.	Please see general comment response # 1
Socioeconomics		Form Letter	In Alternative E, 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 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 in Uintah and Duchesne counties accounts for 49.5% of employment and 60% of total wages. The average wage for exploration and production jobs is \$84,795, about 86% higher than the average wage for recreation jobs. Artificially limiting energy development in the Price Planning Area will deny the local economy similar benefits.	Please see general comment response # 1
Socioeconomics		Form Letter	Alternative E would also have a significant economic impact on the surrounding communities, namely the town of Green River. We currently utilize most of the facilities that the town of Green River has to offer, such as hotels, restaurants, gas and convenience stores. I estimate that my group spends approximately \$500-\$700 during our visits. If the trail systems in this area were to close, myself and numerous other motorized and non-motorized trail users would no longer visit the area, resulting in a significant economic loss to the community.	Additional information is being provided on all economic factors used to evaluate socioeconomic impacts. Impacts of the Plan are fully evaluated in Chapter 4, section 4.6 for socioeconomic and baseline information is provided in Chapter 3, section 3.6. An additional socioeconomic technical report is provided which explains the methodology used to analyze the socioeconomic impacts from having access to BLM lands for multiple uses. It provides the calculations and results for energy production, recreation, and grazing under each alternative allowing for socioeconomic impact comparisons across those alternatives. The

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				<p>report also discusses the input/output model IMPLAN used to model additional economic activity associated with the direct industries tied to the multiple uses on BLM land. The final plan and DEIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of grazing, recreation, and energy production to local communities, such as Emery and Carbon counties under the alternatives, which all have varying levels of resource protection. A discussion of this analysis is provided in Chapter 4, section 4.6.</p>
Socioeconomics		Form Letter	<p>Continued access to public lands means jobs and economic health for our rural areas. Multiple uses such as recreation, minerals development, and ranching help protect our rural economy and improve the economic viability of the community so that our children are not forced to leave the community for job opportunities in Salt Lake City or Denver. Tax revenues from oil, natural gas, and other mineral development are also important sources of revenue for the local and state government, creating a lower tax burden on citizens.</p> <p>Eliminating these lands from multiple use would also negatively impact Utah schools, which rely on the productive use of Utah Trust Lands for funding.</p>	Please see general comment response # 1
Socioeconomics		Form Letter	<p>Alternative E would also have a significant economic impact on the surrounding communities, namely the town of Green River. We currently utilize most of the facilities that the town of Green River has to offer, such as hotels, restaurants, gas and convenience stores. I estimate that my group spends approximately \$500-\$700 during our visits. If the trail systems in this area were to close, myself and numerous other motorized and non-motorized trail users would no longer visit the area, resulting in a significant economic loss to the community.</p>	<p>Additional information is being provided on all economic factors used to evaluate socioeconomic impacts. Impacts of the Plan are fully evaluated in Chapter 4, section 4.6 for socioeconomic and baseline information is provided in Chapter 3, section 3.6. An additional socioeconomic technical report is provided which explains the methodology used to analyze the socioeconomic impacts from having access to BLM lands for multiple uses. It provides the calculations and results for energy production, recreation, and grazing under each alternative allowing for socioeconomic impact comparisons across those alternatives. The</p>

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				report also discusses the input/output model IMPLAN used to model additional economic activity associated with the direct industries tied to the multiple uses on BLM land. The final plan and DEIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of grazing, recreation, and energy production to local communities, such as Emery and Carbon counties under the alternatives, which all have varying levels of resource protection. A discussion of this analysis is provided in Chapter 4, section 4.6.
Socioeconomics	Tyler	Kokjohn	4.2.3.6 Alternative E Cumulative impacts (page 4-5) – “This alternative would increase the costs of resource uses and reduce some socioeconomic benefits in local communities.” If you are going to put these assertions into the alternative and RMP (without documentation or indication as to their level of actual significance, it seems fair to include the fact that conserving resources allows carries a financial benefit to other members of that same community, for example, motel owners and employees of the CEU Museum who serve visitors to Nine Mile Canyon attracted there by the outstanding archaeological features and outstanding natural values of the area.	The analyses contained in the Price Draft RMP/EIS and the non-WSA lands with Wilderness Characteristics Supplement to the Draft RMP/EIS has been modified in the Proposed RMP/Final EIS improving the direct and cumulative impacts analysis for socioeconomics. Specifically, a more specific analysis of the economic impacts of Alternative E was performed, using IMPLAN modeling. In instances where IMPLAN could not capture non-market values, qualitative analysis was augmented to increase detail.
Socioeconomics	Kurt	Reisser	The BLM has drastically exceeded what could be construed as reasonable management in the development of Alternative E, which would withhold 1.5 million acres, more than 60 percent of the study area, from oil and gas leasing and other activities while imposing no surface occupancy on another 130,000 acres. Adoption or incorporation of Alternative E into the Preferred Alternative of the Price Draft EISIRMP would have a crippling impact on oil and gas exploration and development and other multiple uses in the Price Field Office, which would in turn have a severely negative impact on local, state, and Federal economies.	Please see general comment response # 1
Socioeconomics	Kurt	Reisser	The socio-economic analysis contained in the SDEIS grossly underestimates the impacts of Alternative E regarding the loss of jobs related to the energy industry. According to a study prepared by the University of Utah's Bureau of Economic and Business Research, the energy industry accounts for 49.5 percent of the employment and 60 percent of the total wages in Uintah and Duchesne Counties. The BLM's claim that "decreased gas development would lower future potential employment in the area by about 90 part-time and full-time jobs per year as compared to the No	Please see general comment response # 1

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			Action Alternative is unquestionably inaccurate. The analysis must re-evaluate the negative impacts associated with lost revenue to the local, state and federal treasuries. Additionally, the SDEIS must analyze the increased costs associated with development of existing leases in conjunction with the severe restrictions contained in Alternative E. These flaws must be rectified and fully considered before the FEIS is released.	
Wilderness	Paul	Anderson	The possible designation of WC for the Chimney RockSan Rafael Swell area is not a suitable designation. If my understanding is correct, a WC means that the area does not show impact from man. I am very familiar with the Chimney RockSan Rafael Swell area and have been riding motorcycles and exploring the area for many years. Everywhere you go, the presence of man is evident. Many areas in the San Rafael Swell were a hot bed of exploration and uranium mining many years ago. Whether it is the extreme north end or the south end, mining activity is still evident in the forms of drill pads, roads, remnants of equipment, claim markers and much more. This is still evident to this day, and therefore does not fit the designation of being Wilderness Characteristic (WC).	Please see general comment response # 3
Wilderness	Denise	Dragoo	BLM has not formally adopted a policy extending the WSA non-impairment policy to wilderness inventory areas. Further, unlike the WSAs designated under § 603 of FLPMA, there has been no opportunity for public comment on the wilderness inventory units identified in the 1999 Utah Wilderness Inventory. Portions of the Desolation Canyon and the Turtle Canyon wilderness inventory units are located in areas of historic coal mining activity and UEI questions whether these lands should be classified as having wilderness characteristics.	<p>As part of BLM's wilderness characteristics inventory maintenance for the Desolation Canyon area, BLM performed a combination of data and on-site reviews. Portions recommended for review in public comments were included from 1999 Inventory and 2002 Revision. OHV trails were known, as shown on Draft RMP/EIS map 2-54. Coal potential is recognized, as shown on Supplement map 2-70. Oil and gas potential is recognized, as shown on Supplement map 3-23. BLM did revise the Desolation non-WSA land with wilderness characteristics area in 2007 based on new oil and gas development activity. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.</p> <p>As part of BLM's wilderness characteristics inventory maintenance for the Turtle Canyon area, BLM performed a combination of data and on-site reviews. The 1999 Inventory and 2002</p>

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				Revision considered OHV trails, as shown on Draft RMP/EIS map 2-54. Coal potential is recognized, as shown on Supplement map 2-70. Oil and gas potential is recognized, as shown on Supplement map 3-23. No new information was submitted that has not already been considered in BLM's wilderness characteristics inventory maintenance process.
Wilderness		Form Letter	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 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.	Please see general comment response # 2
Wilderness		Form Letter	I feel that the Wilderness Characteristics as described in Alternative E are not substantiated, specifically the Chimney Rock area (Lost Springs WC and the Never Sweat WC), San Rafael Reef WC, Molen Reef WC and Eagle Canyon WC. For example, the Never Sweat and Lost Springs proposed WCs contain the Chimney Rock Motorcycle Trail System. This trail system has been permitted by the BLM for off road competition events for over 25 years.	Please see general comment response # 13
Wilderness		Form Letter	There is no mandate in the Federal Land Policy and Management Act (FLPMA) for further designation of wilderness areas, and no process requirement for engaging in an ongoing wilderness inventory and review.	Please see general comment response # 2
Wilderness		Form Letter	I believe the BLM is establishing new WSAs without the authority to do so. Calling a new WSA by a different name does not make it legal..	Please see general comment response # 2
Wilderness		Form Letter	The SEIS is utilizing the Utah BLM 1999 statewide wilderness re-inventory. This inventory was based on criteria that were not available for public comment and review. As an OHV user who will be directly affected by your decision, regulations say I should have a chance to review and comment on such criteria.	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 in the Administrative Record). The BLM is

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				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 1,094,030 acres of lands for the existence of wilderness characteristics, including all lands within the Red Rock Wilderness Act. The BLM found that 937,440 acres of these lands contained wilderness characteristics and are proposed for protective management in Alternative E. The remaining 156,590 acres did not have wilderness characteristics based on the inventory maintenance conducted by the BLM between 1996 and 2007.
Wilderness		Form Letter	The 1999 inventory found lands that contain extensive OHV trails to have "wilderness characteristics." If the presence of OHV use did not impact the presence or absence of "wilderness characteristics," then by what rationale is the BLM proposing to significantly reduce OHV trails in these areas?	CEQ NEPA regulations require the consideration of the full range of reasonable alternatives, which in the case of protecting, preserving and maintaining non-WSA lands with wilderness characteristics includes eliminating all uses that may result in impacts. In addition to Alternative E which closes non-WSA lands with wilderness characteristics to all uses that could possibly result in the loss of wilderness characteristics, the BLM also considered the No Action Alternative that results in over 36% of these areas open to cross country OHV use and only 1% closed to OHV use. By considering and analyzing this range, the BLM has been compliant with considering the full range of reasonable alternatives in relation to non-WSA lands with wilderness characteristics.
Wilderness		Form Letter	Please disclose the difference in management prescriptions between "non WSA lands with wilderness characteristics" and WSAs in the FEIS.	Please see general comment response # 14
Wilderness		Form Letter	I believe the BLM is establishing new WSAs without the authority to do so. Calling a new WSA by a different name does not make it legal.	Please see general comment response # 2
Wilderness		Form	The SEIS is utilizing the Utah BLM 1999 statewide wilderness re-inventory. This inventory was	As part of BLM's wilderness characteristics

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		Letter	based on criteria that were not available for public comment and review. As an OHV user who will be directly affected by your decision, regulations say I should have a chance to review and comment on such criteria.	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 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 1,094,030 acres of lands for the existence of wilderness characteristics, including all lands within the Red Rock Wilderness Act. The BLM found that 937,440 acres of these lands contained wilderness characteristics and are proposed for protective management in Alternative E. The remaining 156,590 acres did not have wilderness characteristics based on the inventory maintenance conducted by the BLM between 1996 and 2007.
Wilderness		Form Letter	The 1999 inventory found lands that contain extensive OHV trails to have "wilderness characteristics." If the presence of OHV use did not impact the presence or absence of "wilderness characteristics," then by what rationale is the BLM proposing to significantly reduce OHV trails in these areas?	CEQ NEPA regulations require the consideration of the full range of reasonable alternatives, which in the case of protecting, preserving and maintaining non-WSA lands with wilderness characteristics includes eliminating all uses that may result in impacts. In addition to Alternative E which closes non-WSA lands with wilderness characteristics to all uses that could possibly result in the loss of wilderness characteristics, the BLM also considered the No Action Alternative that results in over 36% of these areas open to

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				cross country OHV use and only 1% closed to OHV use. By considering and analyzing this range, the BLM has been compliant with considering the full range of reasonable alternatives in relation to non-WSA lands with wilderness characteristics.
Wilderness		Form Letter	Please disclose the difference in management prescriptions between "non WSA lands with wilderness characteristics" and WSAs in the FEIS.	Please see general comment response # 14
Wilderness		Form Letter	I feel that the Wilderness Characteristics as described in Alternative E are not substantiated, specifically the Chimney Rock area (Lost Springs WC and the Never Sweat WC), San Rafael Reef WC, Molen Reef WC and Eagle Canyon WC. For example, the Never Sweat and Lost Springs proposed WCs contain the Chimney Rock Motorcycle Trail System. This trail system has been permitted by the BLM for off road competition events for over 25 years.	Please see general comment response # 13
Wilderness		Form Letter	The Wilderness characteristics as described in Alternative E are not substantiated on the ground, specifically Chimney Rock (Lost Springs WC and the Never Sweat WC) San Rafael Reef WC, Molen Reef WC and Eagle Canyon WC. First, the Never Sweat and Lost Springs contain the Chimney Rock Motorcycle Trail that needs to be recognized and officially designated. This trail system has been in use for 25 years and has been permitted by the BLM. We have used it for competition, recreation and other events for at least that long.	Please see general comment response # 13
Wilderness	Dale	Grange	The areas have been considered as having wilderness characteristics including Eagle Canyon, the San Rafael Reef, the Molen Reef, and the Chimney Rock area (specifically the Never Sweat Wash and Lost Spring). These areas contain motorized routes, many of which have been used for competitive motorcycle races and as such have gone through the BLM permitting process. This alone established their validity and removes their suitability from further study.	Please see general comment response # 13
Wilderness	Rainer	Huck	Please add this passage to the Executive Summary for the FEIS and to the replacement for 1.6.14: "The Interior Board of Land Appeals (IBLA) has issued numerous decisions regarding the BLM's authority to establish new wilderness study areas. The following paragraphs are quotes from IBLA decisions. "The Bureau of Land Management's (BLM) authority to conduct wilderness reviews or establish new wilderness study areas expired on October 21, 1993, and absent Congressional authorization, BLM may not establish, manage or treat public lands, other than those designated wilderness by Congress under 43 U.S.C Sec. 1782(2000), as wilderness study areas or as wilderness under the	Please see general comment response # 2

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			<p>land use planning provisions of the Federal Land Policy and Management Act of 1976 (FLPMA), 43 U.S.C. Sec. 1712 (2000).</p> <p>“Even where the land has been proposed for wilderness designation in pending legislation, BLM may properly administer those lands for other purposes, where the land has not been included in the wilderness study area. Because the time for taking appeals from inventory decisions has long since passed, the doctrine of administrative finality precludes appellants from challenging those decisions by filing protests against actions taken by BLM to administer the land for other purposes. (IBLA 2002-307, August 17, 2004.)</p> <p>“Once the decision has been made to reject land for inclusion in the wilderness preservation system, NEPA does not require subsequent analysis of the impacts of that determination, because such impacts were considered when the decision was made to administer them for other purposes.</p> <p>“Colorado Environmental Coalition,” 161 IBLA at 396; “Southern Utah Wilderness Alliance,” 158 IBLA 212, 214-15 (2003); “Southern Utah Wilderness Alliance,” 151 IBLA 338, 341-42 (2000); “Colorado Environmental Coalition,” 149 IBLA at 156; “Southern Utah Wilderness Alliance,” 150 IBLA 263, 266-67 (1999); “Colorado Environmental Coalition,” 142 IBLA 49, 52 (1997); “Southern Utah Wilderness Alliance,” 128 IBLA 52, 65-66 (1993).”</p>	
Wilderness	Rainer	Huck	It appears as though BLM is doing what is called in the trade, “manufacturing Wilderness.” This is a covert effort to circumvent both FLMPA, which strictly limited BLM’s authority to set aside lands, the IBLA Decisions cited above, and more recent judicial proceedings which affirmed FLPMA and affirmed that BLM’s authority to “set aside” lands has expired.	Please see general comment response # 2
Wilderness	William	Hughes	Since the selected areas with “Wilderness Characteristics” have retained these characteristics under current management, I suggest the current management situation be retained.	Current management was developed to address land management issues from 15 to 25 years ago. The land uses and interests in public lands have changed, in some cases extensively, in that time period. This planning effort included a scoping process to determine what issues should be addressed in this planning process based on the current land uses and interests. The Draft RMP/EIS and its

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				<p>supplements have been developed to respond to those issues. Chapter 4 of the Draft RMP/EIS and its supplements identifies the environmental impacts of continuing the current management situation.</p>
Wilderness	Thnmas W	La Point	<p>While the BLM's own internal surveys have confirmed that over a million acres within the Price area qualify for wilderness, the proposed plan does little to protect these natural wonders from oil and gas drilling. Instead, it leaves 98% of lands (outside of already protected wilderness study areas) that should be preserved under the Wilderness Act open to drilling threatening places like Desolation Canyon and the Book Cliffs.</p>	<p>Any non-WSA lands found either to have wilderness characteristics will be managed according to management prescriptions established in this land use plan. Unlike WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these Non-WSA lands. These non-WSA lands have many resource values, and the Draft RMP/EIS and its supplements considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. Alternative E is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative E, all the non-WSA lands would be closed to leasing. Other alternatives result in portions of the non-WSA lands being managed as open to oil and gas leasing with standard terms and conditions, as well as with various levels of restrictions.</p> <p>Through its land use planning revision process with full public participation and to comply with the FLPMA multiple-use mandate, the BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>
Wilderness	Scott	Maas	<p>Please provide the following answers in your proposed WSA areas:</p>	<p>WSAs are managed in accordance with the Interim Management Policy for Lands Under</p>

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			How many WSAs are existing, how long they have been in existence and how many have been resolved Contact BLM Eagle Lake Resource to verify that WSA areas exist adjacent to military ordinance demolition Contact BLM Eagle Lake Resource area to verify that existing WSA areas have had toxic fallout so dangerous that ordinance explosion was halted Contact BLM Eagle Lake Resource area to verify that the 85 percent of the WSA areas have been determined to not suitable for wilderness yet have been under wilderness management for over 20 years	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. Only Congress can release a WSA from wilderness consideration. The BLM does not have the authority to designate new WSAs under the land use planning process or to remove the existing WSAs. These actions are outside the scope of this planning process and NEPA document.
Wilderness	Ken	Mantlo	Please disclose the difference in management prescriptions between "non WSA lands with wilderness characteristics" and WSAs in the FEIS	Please see general comment response # 14
Wilderness	Chris	Orndorff	We usually ride in the Dry Mesa/Chimney Rock area and occasionally in the Temple Mountain area due to the availability of single-track trails in these areas. In the areas I am familiar with, there is substantial evidence of man and his activities. There are graded roads, fences, power lines, railroads, reservoirs, cabins, mines, etc. We spend a lot of time riding many of the race trails identified and inventoried by the Sage Riders motorcycle club. Before the Sage Riders, the Pathfinders motorcycle club put on races in the area in the early 1980s and perhaps even earlier. over 100 miles of these trails were archaeologically surveyed, submitted to BLM and approved for use in off-road motorcycle races. While there aren't many races held in the area anymore, the trails still receive use and very much enjoyed by us off-road types. These trails that I speak of include the Dry Mesa, Chimney Rock, Neversweat Wash, Summerville Washes, Humbug Wash, The Door, Lost Springs, and other adjacent areas I don't know the proper names of.	Please see general comment response # 13
Wilderness	Timothy	Ravndal	Only Congress can designate wilderness. The development of administrative designations as in ACEC are not legal. Title 43 does not give Congressional authority to the department of interior or department of agriculture. The guaranteed right of the American people to enjoy and benefit from the resources contained on public lands must be protected. Roadless areas across the west also are a factor that demand that you obey the law and federal regulations as they are clearly explained under 36 C.F.R. 219. The 1964 Wilderness Act as the Federal Land Management Planning Act both are valid laws and must be followed.	Please see general comment response # 2
Wilderness	Robert	Telepak	The Price BLM must openly disclose the difference in management prescriptions between "non-WSA lands with wilderness characteristics" and WSAs in the SEIS.	Please see general comment response # 14
Wilderness	Robert	Telepak	I have reviewed the Sage Riders Motorcycle Club data and agree that the Alternative E Wilderness Characteristics specifically listed in the Chimney Rock area (called the Lost Springs and Never Sweat WCs), those in the San Rafael WC, the Molen Seep WC, and the Eagle Canyon WC are not substantiated by on-the-ground data. The Chimney Rock Motorcycle Trail System is a special case. It has historically been used for BLM-permitted competition events for over 25 years.	Please see general comment response # 13

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Wilderness	Mary	Wilmarth	There is no way these lands meet the standards of wilderness. If the BLM feels it necessary to control use, then use must be evident and therefore the wilderness standard is not met. The BLM is currently designating land as WSA long past the time when the "study" period has elapsed by obfuscation and other deceptive practices. I believe that this SEIS did not divulge changes in standards for the re-inventory, and did not allow for informed public comment.	Please see general comment response # 3
Wildlife and Fish		Form Letter	I appreciate that you have taken the time to analyze a sixth alternative; however, all viable alternatives within the Price DEIS and Supplement generally ignore timely scientific studies and do not provide adequate assurances for sustaining mule deer, desert bighorn sheep, Rocky Mountain bighorn sheep, pronghorn, elk, sage grouse and wild trout.	When analyzing the effects of proposed land management actions on resources, BLM staff used a variety of information sources including peer-reviewed literature, government and non-government organizations research and reports, field office inventory and monitoring data, and field observations. There is a great amount of data available that presents the best scientific information concerning the impacts of oil and gas development on wildlife. Additionally, Appendices 8 and 16 from the Draft RMP/EIS include stipulations for oil and gas development in fish and wildlife habitat. These two appendices have been condensed into Appendix G in the Proposed RMP/Final EIS. Also, please see sections 4.2.8 for a discussion of the impacts to fish and wildlife from mineral decisions and subsequent exploration and development. As leases are proposed, site-specific NEPA analysis, including impacts to fish and wildlife habitat, will be conducted.
Wildlife and Fish		Form Letter	I am concerned that the DEIS would enable energy leasing in crucial wildlife habitats without the upfront conservation planning that is necessary to balance the needs of wildlife and fish with development. The impacts of development on big game and fisheries populations should be weighed in advance so that fish and wildlife losses can be prevented or minimized. Leasing entails a defacto contractual obligation for development. While timing stipulations are important, they do not address how an area will be developed in order to minimize impacts on wildlife habitats and populations.	The BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. As described in Appendix G of the Proposed RMP/Final EIS, timing limitation stipulations on oil and gas leasing could protect wildlife values. At the implementation phase, when the location and scope of a given exploration or development project are known, the Price Field Office will establish plans for mitigation, including fish and wildlife monitoring and the

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				use of adaptive management strategies to prevent or mitigate impacts of oil and/or gas exploration and development. These will be completed during the NEPA compliance on the projects at that time. The BLM's land use planning handbook provides direction for RMP-level decisions in relation to oil and gas leasing, which includes identifying areas available for leasing and any required stipulation. The identification of areas to be offered in a specific lease and the pattern of leasing is not an RMP-level decision and is therefore outside the scope of this EIS.
Wildlife and Fish		Form Letter	The BLM should adopt some level of phased oil and gas development in crucial habitats, including provisions for ongoing, intensive monitoring of fish and wildlife species and their habitats to facilitate alterations in development if unintended adverse impacts occur.	The BLM manages public lands under a multiple-use mandate. Some resource uses could adversely affect other activities. As described in Appendix G of the Proposed RMP/Final EIS, timing limitation stipulations on oil and gas leasing could protect wildlife values. At the implementation phase, when the location and scope of a given exploration or development project are known, the Price Field Office will establish plans for mitigation, including fish and wildlife monitoring and the use of adaptive management strategies to prevent or mitigate impacts of oil and/or gas exploration and development. These will be completed during the NEPA compliance on the projects at that time. The BLM's land use planning handbook provides direction for RMP-level decisions in relation to oil and gas leasing, which includes identifying areas available for leasing and any required stipulation. The identification of areas to be offered in a specific lease and the pattern of leasing is not an RMP-level decision and is therefore outside the scope of this EIS.
Wildlife and Fish		Form	BLM should identify and commit necessary funding needed to conduct the monitoring and mitigation	Funding is approved at the Congressional level

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		Letter	work prior to the leasing of habitats for energy development.	and is outside the authority of the RMP. Oil and gas leasees are held to terms and conditions of the lease, which may include financial responsibility for wildlife monitoring and mitigation.
Wildlife and Fish	Michael	Wolfe	The research referenced herein needs to be considered in order to inform the agency's analysis of the benefits to wildlife from the alternative in the Supplement and the risks to wildlife from the other alternatives in the DRMP/EIS.	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 analysis.
Wildlife and Fish	Michael	Wolfe	I conclude that the need exists to conduct a detailed analysis of the value for wildlife provided by each of the areas of Non-WSA lands with wilderness characteristics identified for consideration under Alternative E. Lacking other information, the larger contiguous tracts would appear most valuable because of less extant fragmentation (i.e. lower ratios of perimeter to area). Such an analysis would provide the basis for ranking these areas as to which should be accorded highest priority for maintaining in a natural state, in order to maximize benefits to wildlife. Consideration should include both high profile, large game species and overall biological diversity and the potential importance of animals that function as keystone species with effects on other trophic levels. Further analysis of the relative benefits for wildlife of specific areas with wilderness characteristics would also be helpful but if this analysis will not be completed before the RMP is finalized, then protecting all of these areas is recommended as providing the most benefits for wildlife.	While such an analysis would lead to the ranking non-WSA lands with wilderness characteristics as to their value in maximizing benefits to wildlife, such an analysis is not necessary to determine the landscape level impacts of protection or no protection. There is ample scientific research that acknowledges that protecting large contiguous tracts protect more acres of unfragmented habitat. This type of qualitative landscape-level analysis can provide the public and decision-maker the information they need to determine the proper mix of protection and use to best meet the BLM's multiple-use mandate. In contrast to a ranked value of each tract of unfragmented habitat that the non-WSA lands with wilderness characteristics decisions would protect or not protect, of more significance is the value of the habitat being affected. The impact analysis in the Supplement and the Proposed RMP/Final EIS address the interaction

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				<p>between area being protected through restrictive management and the most important habitats (crucial) for the various species. The Proposed RMP has been designed to provide the best mix of protection and use, thereby meeting the BLM's mission identified in FLPMA.</p>